

# **Lewisham Local Plan**

An Open Lewisham as part of an Open London

**Regulation 18 stage “Preferred Approaches” document**

## 0 Preface

Mayor's introduction (optional)

Statutory consultation information

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# Part One

Setting the scene and the spatial strategy

# 1 About Lewisham's Local Plan

## An Open Lewisham as part of an Open London

- 1.1. Lewisham's Local Plan sets out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision through to 2040. The main objective of the plan is to achieve 'An Open Lewisham as part of an Open London'. This reflects our commitment to ensure that Lewisham is a welcoming place of safety for all, and where the diversity of the Borough is celebrated. The prosperity of our local neighbourhoods, and the communities of people within them, is essential to ensuring equality of opportunity and for everyone to enjoy a good quality of life.
- 1.2. London has experienced a period of rapid growth and this is expected to continue. Lewisham will grow and evolve as London does. This Local Plan has been prepared to ensure there is a clear framework in place to positively manage growth in a way that respects the distinctive character and diversity of the Borough. The plan will help to ensure that investment decisions meet the aspirations of local communities and contribute to sustaining and creating inclusive, safe, healthy and liveable neighbourhoods.
- 1.3. The Mayor of London recently introduced the concept of 'Good Growth' underpinning the new **draft** London Plan. Good Growth is growth that is socially and economically inclusive and environmentally sustainable. Sitting alongside this is the Mayor of London's ambition for the Capital to be 'A City for all Londoners'. The objective of this Local Plan for 'An Open Lewisham as part of an Open London' responds to these aspirations at a local level, whilst recognising the important role that Lewisham plays as an integral part of London.
- 1.4. The successful delivery of the Local Plan will require strong and effective partnership working between public and private sector stakeholders, as well as local communities. The council will continue to take a leadership role in planning positively for the Borough. Through our unique ways of working, known as the 'Lewisham Way', we will work alongside stakeholders, community groups and local residents to deliver the Local Plan objectives, guided by the aim of delivering prosperous communities and achieving better outcomes for all.

## The planning framework

- 1.5. Lewisham's Local Plan is prepared within the context of a wider planning framework. This sets the main parameters for the plan making process, as well as the contents of local plans and how they should operate. The Planning and Compulsory Purchase Act 2004 is primary legislation that provides the main basis for the plan-led system in England. It is supported by secondary legislation, including the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which provide further details on the process for the council to prepare and adopt the local plan and other supporting documents.

## National planning policy and the London Plan

- 1.6. The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (2019) and planning Circulars. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by Planning Practice Guidance (NPPG) covering a variety of topic areas.
- 1.7. The Local Plan must also be in general conformity with the regional planning policies contained in the London Plan, which is produced by the Mayor of London. The London Plan is the Spatial Development Strategy for Greater London. It helps to ensure a coordinated approach to planning across all boroughs. The London Plan forms part of Lewisham's development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares Supplementary Planning Guidance (SPG) documents that support implementation of the London Plan.

## Lewisham's development plan

- 1.8. Lewisham's statutory development plan consists of the Local Plan (previously known as the Local Development Framework) along with the London Plan and adopted neighbourhood plans. Planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise.<sup>1</sup>
- 1.9. The diagram below illustrates how the Local Plan and its supporting documents sit within the wider planning framework.

## DIAGRAM – LEWISHAM PLANNING FRAMEWORK

## Lewisham's new Local Plan 2020-2040

- 1.10. Lewisham's new Local Plan will replace the council's current suite of development plan documents, bringing the updated policies together into a single plan.<sup>2</sup>
- 1.11. We are producing a new Local Plan to:
  - Respond to significant **changes to the wider planning context** – since the Lewisham Core Strategy was adopted in 2011, new national policy has been introduced, i.e. the NPPF. This includes new requirements both for plan making and decision taking. The London Plan has also been substantially updated and a **draft** new (replacement) plan has been published with significant policy changes and a new spatial development strategy. In addition, the council has a new statutory duty to review its Local Plan every five years. We need to ensure there is an up-to-date plan that aligns with these new higher-level policies and requirements.

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<sup>1</sup> Planning and Compulsory Purchase Act 2004, Section 28 (6).

<sup>2</sup> The Local Plan will update and consolidate the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014), and Lewisham Town Centre Local Plan (2014), and replace these documents, once adopted.

- Respond to the **climate emergency** – in February 2019 the council declared a climate emergency.<sup>3</sup> We recognise that a changing climate will have severe and enduring implications, and that tackling climate change is an issue of social justice as the greatest impacts will be on the most vulnerable. The new Local Plan is needed to respond to the climate emergency, with a clear framework for Lewisham to contribute to meeting the UK’s new net zero carbon target.<sup>4</sup>
- Realise the **objective of an Open Lewisham** – a new plan is needed to address the emerging challenges and opportunities that our residents, businesses and visitors now face. The Local Plan will help to manage growth and coordinate investment locally, reflecting the aspirations and priorities of local communities and the council’s new Corporate Strategy 2018-2022. The plan is also presented in a new format to help deliver this vision. It comprises a single document providing a clear planning and decision-making framework, with a renewed emphasis on Lewisham’s distinctive neighbourhoods and places. This will be particularly useful to community groups preparing neighbourhood plans and others who are seeking to get involved with planning locally.
- Meet **local needs for genuinely affordable housing**, jobs and community facilities, including high quality green spaces - the Core Strategy and its supporting plans have helped the council and its partners to deliver a significant increase in homes along with investment in town centres, new workspace and infrastructure. Most of the key strategic development sites identified in the existing plan have now either gained planning consent, been built, or are under construction. With the London Plan and NPPF setting ambitious growth targets there is a pressing need to identify additional development sites and land to accommodate new homes along with workspace and jobs, town centre uses and community facilities.
- Secure the delivery of the **Bakerloo Line extension** and other transport infrastructure – investment in transport infrastructure is needed to help tackle deprivation and improve health outcomes locally, as well as to ensure that growth is supported in a sustainable way. The **draft** London Plan now confirms a commitment to upgrade and extend the Bakerloo line (London Underground) to Lewisham. The new Local Plan is needed to help secure the delivery of the tube line extension and set a framework to maximise the local benefits it can bring.

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<sup>3</sup> London Borough of Lewisham. Meeting of council on 27 February 2019. Motion 2 declared to be unanimously carried.

<sup>4</sup> In June 2019, the UK passed legislation to revise the Climate Change Act target to an emissions reduction of “at least 100%” by 2050 (net zero).

## How the plan is being prepared

### Key stages

- 1.12. There are a number of stages involved in the preparation of a local plan. In addition, there are procedural requirements that the council is required to comply with throughout. These stages and requirements are prescribed by national policy and legislation. This includes the undertaking of multiple rounds of public consultation before a draft local plan can be submitted to the Secretary of State for independent public examination.
- 1.13. **Figure XX** sets out the key stages of the plan making process, highlighting the current stage of production.

Milestone	Indicative Date
First engagement and consultation (first local call for sites)	May – June 2015
Consultation on initial main issues (proposals not taken forward)	October – November 2015
GLA call for sites (SHLAA)	March – June 2016
Second engagement and consultation (second local call for sites)	September – November 2018
Preparing the Draft Local Plan / reviewing responses from call for sites and preparing technical evidence bases	Autumn 2018 – Spring 2020
Draft Local Plan (Regulation 18 consultation)	Spring/Summer 2020
Publication of the Local Plan for Submission (Regulation 19 consultation)	Winter 2020/2021
Submission to the Secretary of State (Regulation 22 submission)	Spring/Summer 2021
Examination by a Planning Inspector	Autumn/Winter 2021
Adoption by Full council	2022

### Evidence base

- 1.14. We have compiled a number of studies and supporting documents to help inform the preparation of the new Local Plan. These have been prepared both by the council and other organisations, including government bodies. Collectively, these documents are known as the 'evidence base'. The evidence base helps to ensure that the approaches and policies in the Local Plan are appropriate and justified, taking into account the latest available information.
- 1.15. Our evidence base comprises technical studies, research reports, site and area masterplans, an Integrated Impact Assessment and other information covering a variety of topic areas and local issues, including: design, housing, economy, environment, transport and infrastructure. The evidence base documents have been made publically available on the council's website and form part of the Local Plan library.

### Integrated Impact Assessment

- 1.16. An Integrated Impact Assessment (IIA) helps to inform the preparation of the Local Plan. It is a detailed analysis of the potential environmental, social and economic effects of the plan. The IIA brings different types of assessment together into a single process, including:

- Strategic Environmental Assessment (SEA)
- Sustainability Appraisal (SA)
- Equalities Impact Assessment (EqIA)
- Health Impact Assessment (HIA)

1.17. The IIA is undertaken as an iterative process during the plan’s preparation. It includes assessments of preferred policy approaches and reasonable alternatives. Reports are published and consulted on at key stages in the plan process, often alongside draft Local Plan documents. The IIA helps to identify potential issues at an early stage so that measures to avoid or mitigate harm, and improve expected outcomes, can be incorporated into the plan.

1.18. A separate Habitats Regulations Assessment (HRA) is also carried out to assess whether protected habitats and species may be adversely impacted by the plan’s implementation.<sup>5</sup>

### Tests of soundness

1.19. The Local Plan sets out an ambitious programme to help facilitate investment in our neighbourhoods and sustainably manage growth over the long-term. To realise the plan’s vision and to secure the new homes, jobs and infrastructure required for Lewisham, the plan must be demonstrated to be deliverable. The NPPF sets out ‘tests of soundness’ that help to ensure deliverability. The soundness of the plan is assessed at the examination stage.

<b>Tests of soundness for local plans (NPPF, paragraph 35).</b>	
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
Justified	An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
Effective	Deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
Consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

## Getting involved in the new Local Plan

1.20. The preparation of the Local Plan, and its successful implementation, will require Lewisham council to take a positive and proactive approach to working alongside a wide range of stakeholders. We recognise the importance of engaging with local residents, community groups, businesses, infrastructure providers, landowners, neighbouring local authorities and other stakeholders. Meaningful dialogue, including through formal public consultation, helps to ensure that the Local Plan reflects the aspirations of the wider community and that it is deliverable.

<sup>5</sup> Designated under European Union council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

- 1.21. This document has been prepared for a statutory public consultation (i.e. the Regulation 18 consultation stage). It outlines the key issues and options that have been considered in the preparation of the Local Plan to-date, along with the preferred approaches to address these issues. The draft Local Plan has been prepared taking into account earlier feedback from the public, as set out below.

### **Previous engagement and the journey so far**

#### Starting the Local Plan review

- 1.22. We undertook a number of engagement exercises around the main challenges and opportunities for the Borough in preparation for a new local plan, beginning in late 2015. At this time we invited local residents, community groups, businesses, key stakeholders and others with an interest in the Borough to consider key planning issues and the options for addressing them. We also carried out several 'call for sites' exercises inviting the wider public, including landowners, to identify land that might be available for different types of development. We asked for information on the likely timescales for new development to come forward at these locations as well as any factors that could affect delivery.

#### What has changed since?

- 1.23. There have been significant changes in the planning context since we embarked on the local plan review in late 2015. At a national policy level the NPPF was revised in 2018, and updated again in 2019. In London, the Mayor of London published alterations to the London Plan (in 2015, and again in 2016). A completely new (replacement) London Plan was then drafted in 2017 and this was recently taken to independent examination. Both the NPPF and the **draft** London Plan propose fundamental changes to the planning context.
- 1.24. Alongside these changes to higher-level policies there have been important initiatives at the local level. The council adopted the Corporate Strategy 2018 – 2022 that sets out our new strategic priorities. Also, in 2019, we declared a climate emergency that requires an urgent and strategic response. Many other key initiatives have also been kick-started. They cut across the council's different service areas but invariably link to forward planning. They range from work on a democracy review to improve transparency in decision-making, public health initiatives that form part of the Healthy Neighbourhoods programme, a masterplan to guide regeneration of Catford town centre, and cultural projects centred on Lewisham's new Creative Enterprise Zone, to name a few.
- 1.25. Since 2015 Lewisham itself has also changed. The existing local plan has helped to facilitate substantial growth and investment in our neighbourhoods. Crucially, the council has consistently delivered on its housing targets, bringing more affordable housing to those in need. Furthermore, all of the strategic site allocations identified in the Core Strategy have now been committed – this means that the sites have gained planning consent, with construction having started or completed on some. Within key areas of the Borough significant plan-led regeneration has also been realised, and is continuing, with investment in high quality affordable housing, workspace, community facilities, public realm and supporting infrastructure.

#### Early engagement on the main planning issues

- 1.26. The public engagement in 2015 identified a number of strategic planning issues. As the starting point for preparing a new plan, we looked at the existing spatial strategy, its key development principles and what this strategy had delivered. We then identified a number of new challenges that needed to be addressed at the strategic level. These related mainly to the future levels of growth to be accommodated in the Borough, the competing pressures on different land uses, and above all the need to deliver new development in a socially, economically and environmentally sustainable way.
- 1.27. Our early engagement exercise also explored key issues and opportunities across specific topic areas. It identified the continuing need to meet different types of local housing needs, such as affordable housing and specialist accommodation for older people; the opportunities provided by the major centres of Lewisham and Catford to accommodate new homes, workspace, services and facilities; further significant opportunities for renewing and revitalising district and local hubs; a need for areas outside of these key locations to accommodate investment and change through infill and small scale development; and a renewed focus on Lewisham's places to reflect local identity and foster a real sense of place.

#### Re-visiting the main planning issues

- 1.28. Whilst many of these issues remain relevant today, the wider context for the new plan has changed. This includes the fundamental changes to national and regional planning policy, as well as the evolving role and character Lewisham in a rapidly growing London. Furthermore, there is greater urgency required to address specific issues such as the climate emergency and acute local needs for genuinely affordable housing. We are therefore revisiting the main issues and approaches outlined in 2015 through this consultation document. This will ensure that the new Local Plan responds to our corporate priorities and remains fit for Lewisham over the long-term.
- 1.29. Responses received on the 2015 main issues engagement have been considered in the development of this consultation draft of the new Local Plan. We have provided a summary of the responses received in 2015 as part of the Consultation Statement. In addition, all the sites identified through our numerous 'call for sites' exercises (2015, 2016 and 2018) have been taken into account. We have used feedback from previous engagement to help identify the main issues for the Local Plan and to inform the preparation of the preferred approaches outlined here, including the spatial strategy and detailed policies.

#### **Have your say**

- 1.30. This consultation provides the opportunity to review and feedback on the main issues and options identified, including the preferred policy approaches and site allocations. We are also inviting views as to whether there are any new strategic issues or opportunities that may not yet have been identified, but which should be considered as the plan is progressed.
- 1.31. We will consider all comments made during this Regulation 18 stage consultation. Responses will be used to inform the 'publication' version of the new Local Plan, which will be made available for a further statutory round of public consultation (i.e. Regulation 19 stage). Throughout the plan's production, we will publish consultation statements summarising all of the feedback received and how this has been taken into account.

## How to use the plan

- 1.32. The Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the twenty-year period from 2020 to 2040.<sup>6</sup> The plan will help to support implementation of the **draft** London Plan and its aspirations for achieving ‘Good Growth’ locally, recognising that Lewisham is an integral part of London.
- 1.33. The Local Plan will be used by the council, its partners, key stakeholders, community groups and others as a tool to help guide critical decisions on investment, including for strategic infrastructure. It establishes a spatial strategy that aims to direct growth and different kinds of development across the Borough in a way that responds to the distinctive qualities of Lewisham’s people and places. The Local Plan also provides a coordinated strategy for each of the character sub-areas of the Borough, addressing the neighbourhoods that residents, businesses, and visitors use every day.
- 1.34. For legibility the Local Plan is set out in main parts and sub-sections that cover a number of policy areas however it must be read as a whole, particularly for the purpose of planning and investment decisions.
- 1.35. The Local Plan is organised into five main parts:
- **Part One: Setting the scene and the spatial strategy** – provides background information on the Local Plan before setting out the Vision for Lewisham and the plan’s strategic objectives. It also establishes the ‘spatial strategy’ for the Borough, the land-use priorities and overall pattern of development that the plan will seek to deliver.
  - **Part Two: Managing development** – sets out the ‘development management’ policies that all planning applications will need to comply with. The policies, detailed requirements and guidance are organised across a number of topic areas. These policies will ensure that all proposals contribute to delivering sustainable development, consistent with the NPPF and the London Plan’s ‘Good Growth’ objectives.
  - **Part Three: Lewisham’s neighbourhoods & places** – establishes character areas within the borough based around Lewisham’s distinctive neighbourhoods and places. A vision and strategic priorities (referred to as ‘place principles’) are set out for each of Lewisham’s character areas, along with site allocation policies for strategic development sites. These policies, which must be read alongside those in Part Two, are necessary to support delivery of the spatial strategy for the Borough, and to help manage change and investment in a coordinated way.
  - **Part Four: Delivery and monitoring** – sets out the implementation framework for the Local Plan, as well as the arrangements for monitoring and outcomes over the plan period.

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<sup>6</sup> The plan period differs slightly from that initially proposed in the “Main Issues” consultation in 2015 to comply with the new requirements of the NPPF (2019).

- **Part Five: Schedules and appendices** – includes additional technical information and guidance.

## Strategic and non-strategic policies

1.36. The council is legally required to identify the strategic priorities for the development and use of land in the Borough, and to set out policies to address these in the local plan.<sup>7</sup> The NPPF also makes clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies.<sup>8</sup> A list of the Local Plan's strategic policies is included in **Appendix X**.

### Neighbourhood planning

- 1.37. We will continue to work with local communities and community groups to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process.
- 1.38. The council has a statutory duty to support designated neighbourhood forums in the preparation of neighbourhood plans. We will work positively with forums to ensure their plans appropriately support the council's strategic planning priorities, so that they have the best chance of succeeding at the examination stage and can be formally adopted. This Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. For example, Part Three sets key objectives and priorities for the Borough's character areas. It provides a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan's implementation.
- 1.39. Neighbourhood plans are required to be consistent with the strategic policies in Lewisham's development plan (including London Plan and Local Plan policies), and should only include non-strategic policies, as required by the NPPF.

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<sup>7</sup> Planning and Compulsory Purchase Act 2004, Section 39(2).

<sup>8</sup> NPPF (2019), paragraph 21.

## 2 Lewisham today and planning ahead

### Introduction

- 2.1. This section provides a brief overview of Lewisham in the context of London and the wider region. It draws on the latest available information to provide a snapshot of the Borough across a range of topic areas, highlighting key findings and recent trends. It also identifies some of the main opportunities and challenges facing Lewisham's residents, businesses and visitors, including considerations for the built and natural environment.

### Lewisham in context

- 2.2. Lewisham is an inner-London borough strategically located in the Thames Gateway, with connections to Canary Wharf and the Central Activities Zone. It has major centres at Lewisham and Catford, and two London Plan Opportunity Areas with strategic potential (New Cross / Lewisham / Catford corridor and Deptford Creek / Greenwich Riverside). Lewisham has experienced rapid growth in both population and households over the last ten years, and has a relatively young and very ethnically diverse population.
- 2.3. There has been significant investment in recent years in many parts of Lewisham. This has largely been concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas. Whilst levels of deprivation have improved recently Lewisham remains within the 20% most deprived local authorities in England, and is the tenth most deprived London Borough. It has the highest proportion of children and young people, and older people in economic deprivation in the country.
- 2.4. There are also pronounced concentrations of deprivation in many local areas. Life expectancy across Lewisham is comparable to the London average, however in the most deprived areas life expectancy is 6.1 years lower for males and 5.1 years lower for females. Future investment will need to consider these inequalities and varied geographies of deprivation.
- 2.5. Physical activity is a key determinant of public health and wellbeing, with obesity linked to many serious risks in children and adults. Whilst over half of Lewisham adults are physically active, adult and childhood obesity is an issue. Children living in the Borough's most deprived areas twice as likely to be obese or overweight as other children.
- 2.6. Lewisham's diverse history has led to a range of distinct places and neighbourhoods, each with its own unique character and identity. This is reflected in the historic environment that features over 600 statutory listed buildings, 29 Conservation Areas, as well as Lewisham's varied and vibrant cultural scene. Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Median house prices in Lewisham have risen over 310%

from £99,995 in 2000 to £412,000 in 2017. Whilst monthly private rental prices have remained relatively low, median rental prices increased 35% from 2010 to 2017 (London average 14%). In 2017 average private rents were 43% of average household incomes.

- 2.7. Despite Lewisham's strategic inner-London location, its local economy is generally small and inward looking. Local jobs are concentrated in the public sector and consumer services, with high levels of small business activity including self-employment, micro businesses, and sole proprietors. Whilst a relatively limited proportion of residents are employed in the Borough, a relatively high proportion are economically active. Many residents lack workplace skills and qualifications, and GCSE results are below the London average. The Creative and Digital Industries (CDI) is an emerging growth sector, and north Lewisham is home to one of London's first Creative Enterprise Zones.
- 2.8. Industrial and commercial activity is largely focussed towards the Borough's designated employment locations and town centres, including two London Plan Strategic Industrial Locations (SIL). A process of plan-led industrial land consolidation has occurred in recent years to help facilitate regeneration in the north of the Borough. However the rate of employment land release (on both designated and non-designated sites) has been significant in recent years. Whilst local employment sites are under increasing pressure for change of use, there is a tight supply of industrial land and relatively healthy industrial market, with a strong demand for workspace, low vacancy rates, and limited availability at key locations. The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern. The use of multi-channel (on-line) shopping is changing the way in which people use centres. There is projected to be less demand for retail floorspace over the future, with greater demand to accommodate leisure and other complementary town centre uses.
- 2.9. Lewisham is one of the greenest Boroughs in London with around one-quarter of its area being green/open space. Despite this there are parts of the Borough that are deficient in public access to open space. This is often a result of natural and constructed features (river valleys, railway lines, major arterial roads), which can act as a barrier to pedestrian movements. Overall more than 95% of the publically accessible spaces in Lewisham are considered to be of good or fair quality. Whilst carbon dioxide emissions and total energy consumption have steadily fallen in Lewisham, emissions remain an issue and the council has declared a climate emergency in February 2019. The South East London Combined Heat and Power (SELCHP) plant offers potential to support a district heat network to supply energy to homes and businesses in the north of the Borough.
- 2.10. Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer infrastructure and lower public transport coverage. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. Daily cycle trips are at a comparable level to inner-London. Large parts of the Borough are covered by Air Quality Management Areas, including along main and arterial roads.

- 2.11. The **draft** London Plan identifies the proposed Bakerloo Line Extension (BLE) as a key strategic transport infrastructure. The preferred route of the BLE proposes phase 1 extending from Elephant & Castle via Old Kent Road with stations at New Cross Gate and Lewisham. A potential phase 2 extension of the Bakerloo Line is being discussed that would run further south into the Borough. The BLE presents a key opportunity to reinforce Lewisham's strategic role as a transport hub servicing the sub-region, and to deliver substantial investment in the Borough.

## Planning ahead for an Open Lewisham

- 2.12. This section sets out the key issues and opportunities that the Local Plan will look to address. This is informed by the analysis of the existing characteristics of Lewisham today, and also considering likely future trends. The main issues have also been identified through ongoing public engagement, including with local communities, residents, businesses and visitors. The section considers the key drivers for change and investment in Lewisham up to 2040, and reflects on some of the main outcomes sought through a new Local Plan.

### Accommodating growth

- 2.13. The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a 19% population growth between 2017 and 2040.<sup>9</sup> This will likely put further pressure on local services and infrastructure, and may exacerbate issues around access to high quality housing and affordability. At the same time, there are likely to be new opportunities and local benefits arising from growth, for example, through the revitalisation and regeneration of town centres, renewal of employment land and greater investment in services and strategic infrastructure, particularly transport infrastructure.
- 2.14. Since the Core Strategy was adopted in 2011 Lewisham has delivered a consistent supply of new homes, regularly exceeding its housing targets. The council recognises the issues around access to high quality and genuinely affordable housing. The scale of the need is reflected in both the **draft** new London Plan and the NPPF housing targets, and the expectation is that the Borough will continue to play a key role in accommodating housing growth.
- 2.15. The **draft** London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the region. In order to address the identified needs, it sets out 10-year housing targets for all boroughs. Lewisham's target is 16,670 net housing completions (or 1,667 net new homes per year). Alternatively, a Local Housing Need (LHN) figure for the Borough is calculated using the method set out in national policy. This method suggests that the minimum housing need in the Borough is up to 2,964 net units per year.
- 2.16. Evidence shows that there is a need to secure additional retail and employment floorspace in Lewisham. Over the next 15 years, there is an estimated demand for

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<sup>9</sup> [Greater London Authority, Housing-led population projections \(2017\)](#)

approximately 14,500 net additional square metres of retail floorspace and 15,000 net additional square metres of employment floorspace. By planning to meet this need, we can help to address the economic issues facing our high streets and support the evolving role of town centres as leisure and entertainment destinations. It should also support an improved local economy and an increase in local jobs, and assist in growing the creative and digital industry clusters.

- 2.17. A plan-led process of industrial land consolidation has been facilitated by the council over recent years, particularly to support strategic regeneration projects. However, a significant amount of employment land and floorspace has also been lost through piecemeal development, aided by the introduction of new permitted development rights allowing for the conversion of workspace to non-employment uses. Evidence suggests that there is no further scope for the loss of industrial land in Lewisham, and that the protection and intensification of existing sites should be pursued in order to meet future demand for workspace, particularly for smaller and medium sized businesses.

### **Tackling deprivation and ensuring equality of opportunity**

- 2.18. There is a pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to positively seek to ensure equality of opportunity, especially for those living in the Borough's most deprived areas.
- 2.19. There has been significant investment in recent years in many parts of Lewisham. In order to tackle deprivation and ensure equality of opportunity for all, it will be necessary to ensure all Lewisham residents benefit from future investment in new homes, jobs, town centre uses, and supporting infrastructure.
- 2.20. Lewisham is a very attractive place to live, however local households are increasingly spending a larger proportion of their incomes on housing costs. Furthermore, there are groups with specific requirements, including families and older people, whose choices are limited in the current market. To address inequalities and improve the quality of life of residents, it is vital that new housing development provides for different types and sizes of accommodation, whilst maximising the delivery of genuinely affordable housing.
- 2.21. For people to participate meaningfully in their communities, and to fully benefit from London's economic advantages, it is important that they are able to take up employment. Access to training and job opportunities is vital to addressing inequality and achieving social equity. Despite being strategically situated, Lewisham has a smaller and inward looking economy. It is necessary to grow and diversify the local economy, creating more and a wider range of businesses and job opportunities for residents to access.

### **Achieving healthier, more liveable and resilient communities**

- 2.22. To improve the wellbeing of the Borough's population, it will be necessary to address the wider determinants of health and deprivation in a more integrated way. This is especially to ensure that Lewisham's children and young people are given the best start in life and allowed to fulfil their potential. Good access to high quality

education and health care is critical. It is also important that people are able to pursue active and healthy lifestyles with relative ease.

- 2.23. The built environment is critical to achieving these ambitions. The layout and design of places and spaces can enable and encourage active travel choices, such as walking and cycling. Additionally, it can assist in reducing people's exposure to harmful pollutants or other disturbances, and increase the ability of people to access high quality open space and natural features. Such spaces can impact positively on physical and mental health by allowing opportunities for leisure, recreation, and dwelling. The local plan will need to ensure that all new development addresses public health and wellbeing in a more integrated and systematic manner.
- 2.24. Levels of public transport accessibility differ across neighbourhoods, and some areas suffer from very poor levels of service. This contributes to a reliance on private car use and causes traffic congestion, along with environmental issues such as pollution and carbon emissions. The local plan will need to ensure improvements to public transport services are provided, that accessibility is increased, and that there is a reduced need for people to travel long distances. This will require a coordinated approach to investment in transport infrastructure and the public realm, alongside the provision of a better connected network of high quality town centres and local destinations to reduce the need to travel by car, and the creation of compact neighbourhoods.
- 2.25. Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history and cultural development. To accommodate growth and investment in a coordinated manner the local plan will need to carefully consider the existing character of local places and neighbourhoods, and the mixed and diverse communities that make Lewisham so unique. The local plan will set a spatial strategy that will coordinate growth and investment across the different places and neighbourhoods of Lewisham, informed by an analysis of character in the different parts of the Borough.
- 2.26. Global climate change poses a significant threat to the natural environment and the human population, and is the most important challenge we currently face. Lewisham is committed to tackling climate change and declared a 'climate emergency' in February 2019. The local plan will assist in mitigating climate change by continuing to realise long-term reductions in energy use and carbon emissions. Lewisham will play its part in realising the **draft** London Plan objective for London to become a zero carbon city by 2050. The impacts of climate change will be felt differently across areas, and it poses a very real risks to human safety. Given the characteristics and patterns of development in Lewisham it will be necessary for the Borough's localities to become more resilient and better placed to adapt to its impacts. The Local Plan will consider the local implications of the climate emergency in Lewisham.

### 3 Vision, strategic objectives and the spatial strategy

#### Vision for Lewisham

3.1. The Local Plan is focussed on the aspiration to realise the 'Vision for Lewisham':

Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected. We will always celebrate what makes us different and have a strong sense of community. We will give people the security and certainty they need so that everyone can live their best lives.

Lewisham will be a place where all generations not only live but also thrive. A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life. A place where you can get on, regardless of your background and where you are always treated fairly and are supported to achieve your full potential.

Lewisham will continue to be a dynamic place, reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world renowned institutions. We will not only protect them but grow them. We will contribute to and share in more of London's future prosperity, becoming a greener, healthier and more resilient place by leading the way in responding to the global climate emergency.

Most of all, we want you to love living in Lewisham.

## Strategic objectives

- 3.2. The following sub-section sets out the strategic objectives for the Local Plan. The objectives help to form a link between the Vision for Lewisham and the spatial strategy. They are set in the context of the key challenges facing the Borough now and over the long-term, and represent the main delivery outcomes sought through the implementation of Lewisham’s Local Plan.
- 3.3. The strategic objectives have been informed by and reflect many of the key documents prepared by the council, including the Corporate Strategy 2018-2022, along with those published by our partners and other key stakeholders.
- 3.4. An overarching objective for “An Open Lewisham as part of an Open London” helps to frame the strategic objectives, which are presented across nine themed topic areas. The objectives have been set out this way for organisational purposes and are not listed in order of priority. Many of the individual objectives are crosscutting in that they address more than one of the topic areas.

<b>Lewisham Local Plan – Strategic Objectives</b>	
<b>A An Open Lewisham as part of an Open London</b>	
<b>1</b>	Sustain and create inclusive communities that both reflect and reinforce the diversity and cultural heritage of Lewisham’s people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham.
<b>B Housing tailored to the community with genuinely affordable homes</b>	
<b>2</b>	Proactively respond to population growth and help to meet London’s housing need by positively managing the delivery of new homes across the Borough.
<b>3</b>	Ensure Lewisham’s existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing that is tailored to meeting the varying needs of the community, including the needs of those from all age groups at different stages of life, families and those with specialist housing requirements.
<b>4</b>	Foster and help to reinforce community cohesion through the provision of housing that enables individuals and households to both settle in the local area and remain rooted to it.
<b>C A thriving local economy that tackles inequalities</b>	
<b>5</b>	Strengthen Lewisham’s role in the wider London economy by expanding the local business base, through steering investment to town centres and other employment hubs and supporting the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries.
<b>6</b>	Increase the number and variety of local jobs and business opportunities, by making the best use of employment land and providing suitable space to support businesses of all sizes, along with securing affordable workspace and workplace training programmes.
<b>7</b>	Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail, business and cultural

	activities – with a thriving evening and night-time economy – through investment to secure Lewisham centre’s future role as a regionally important Metropolitan centre, to deliver regeneration in Catford Major centre and to support the vitality of town centres elsewhere.
<b>D A greener Borough</b>	
8	Help London to achieve National Park City status and ensure all Lewisham residents benefit from access to high quality green space, by protecting, enhancing and connecting the Borough’s network of parks, open and water spaces, including through delivery of a Green Grid to improve linkages to and between these spaces.
9	Promote and protect the ecological, biodiversity and amenity value of the Borough’s natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise.
10	Manage waste responsibly by prioritising implementation of the most sustainable options in the waste hierarchy and safeguarding appropriate sites for the Borough to meet its strategic waste apportionment requirement.
<b>E Responding to the climate emergency</b>	
11	Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes - including walking and cycling - ensuring that new development is designed to maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect.
12	Guard against the risk of flooding by ensuring that new development is appropriately located, implementing sustainable drainage systems, retaining and enhancing flood defences including through river restoration works, along with improving the water quality of the rivers Thames, Ravensbourne, Quaggy and Pool.
<b>F Celebrating our local identity</b>	
13	Retain, reinforce and help shape the distinctive character and identity of Lewisham’s communities and townscapes by ensuring that all new development positively responds to the special attributes of its local context – including the cultural, historic, built and natural environment - and is designed, constructed and maintained to a high quality standard.
14	Make the optimal use of land to facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at Deptford Creek / Greenwich Riverside and New Cross / Lewisham / Catford, and at key growth locations elsewhere, and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment including in the wider Thames-side area.
15	Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it, including by working with neighbouring authorities and other stakeholders to sustain the value of local heritage assets and their setting, along with the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
<b>G Healthy and safe communities</b>	
16	Address the wider determinants of physical and mental health and deprivation in an integrated and systematic way to improve the wellbeing of the population, to reduce

	health and other inequalities particularly where these are geographically concentrated, and to give children and young people the best start in life.
17	Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by promoting the Healthy Streets principles, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
18	Promote cohesive and liveable communities by ensuring mixed and balanced neighbourhoods where development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
19	Create safer communities and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.
<b>H Securing the timely delivery of infrastructure</b>	
20	Provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely delivery of new infrastructure, including through the use of Community Infrastructure Levy funding and planning contributions.
21	Work in partnership with central government, the Greater London Authority / Transport for London, Network Rail and other stakeholders to increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through delivery of the Bakerloo Line Extension.
<b>I Ensuring high quality education, health and social care</b>	
22	Ensure that all Lewisham residents benefit from access to high quality education, health and social care by protecting and planning for facilities to meet local needs and working with stakeholders, including the NHS, to support innovative approaches to delivering services.

### Towards a new spatial strategy

- 3.5. The following section will provide a summary of the 'reasonable' spatial alternatives that we have considered in the preparation of the local plan. This will be important to meeting the tests of soundness through the plan preparation process.
- 3.6. The section will include an overview of the current spatial strategy and what it has delivered, and the need to review this in the context of the new higher challenging growth targets and meeting local needs for housing, workspace, town centre uses, etc. and other factors
- 3.7. We will also be testing these main spatial alternatives through the Integrated Impact Assessment.

## OL 1 Delivering an Open Lewisham (spatial strategy)

- A. The council will work positively and alongside local communities and community groups, public and private sector stakeholders, development industry partners and the wider public to realise the Vision for Lewisham, and to deliver the strategic objective for 'An Open Lewisham as part of an Open London' by:
- a. Ensuring that the growth and regeneration potential of Lewisham's London Plan Opportunity Areas are fully realised, specifically at New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside, including by preparing and implementing local area frameworks, such as the New Cross Area Framework and the Catford Town Centre Master Plan;
  - b. Directing new investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle deprivation and ensure equality of opportunity;
  - c. Promoting a vibrant and diverse multi-centred Borough by directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vitality and long-term resilience, and through this process:
    - i. Enable Lewisham town centre to cement its position as a centre of sub-regional significance and achieve metropolitan centre status;
    - ii. Facilitate the comprehensive regeneration of Catford major town centre to reinforce its role as the principal civic and cultural hub within the Borough; and
    - iii. Ensure the district town centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive features whilst evolving in their function as key hubs of community, cultural and commercial activity;
  - d. Facilitating new development along the north-south A21 corridor (Lewisham High Street, Rushey Green and Bromley Road) and other strategic corridors (such as the east-west New Cross Road / A2 corridor) as well as around principal transport routes, nodes and interchanges, to support growth and integrated place making. This includes improvements to better link Lewisham's town centres and neighbourhoods with each other and those in adjoining Boroughs, using the Healthy Streets approach;
  - e. Working with partners to deliver new and improved community and strategic transport infrastructure, including the Bakerloo Line extension, as a catalyst for investment and to unlock the development potential of the Borough. This is particularly in the London Plan Opportunity Areas and Lewisham's southern areas, where interventions and transformational change can positively address inequalities and local deprivation. Over the long-term, the delivery of infrastructure will support the designation of a new Opportunity Area at Bell Green and Lower Sydenham in the London Plan.
  - f. Proactively seeking to make the best use of land and space, and prioritising the redevelopment of brownfield land for new housing and workspace, along

with optimising the development of strategic sites and other smaller sites across the Borough, including through their sensitive intensification;

- g. Requiring all new development to be delivered through the design-led process and informed by an understanding of local area character (including the historic, cultural, natural and built environment), to enhance local distinctiveness, and to help secure liveable, healthy and safe communities that are inclusive to all;
- h. Protecting, enhancing and connecting Lewisham's network of green infrastructure (including trees, parks and open spaces, water spaces and biodiversity), as well as improving the population's access to it, as an integral component of Good Growth along with ensuring that all new development responds to the climate emergency, with measures for climate change adaptation and mitigation.

### **Explanation**

- 3.8. This policy is the overarching strategic policy for the Local Plan and is the starting point for achieving the Vision for Lewisham. It sets out the spatial strategy for the Borough, which is the land use and planning framework for the council and its partners to manage growth and guide investment over the next 20 years. The spatial strategy directly addresses the Local Plan objectives, including the overall objective of 'An Open Lewisham as part of an Open London'.
- 3.9. This policy is also the platform for the remainder of the Local Plan. All of the other plan policies emanate from this principal policy and provide further details and guidance to assist with its implementation. It is an important reference point for all future planning proposals and establishes the strategic land use priorities that new developments will be expected to engage with.
- 3.10. Finally, the policy helps to address the 'Good Growth' objectives set out in the **draft** London Plan. Lewisham has an important role to play in helping to deliver the London Mayor's vision for the Capital. London's future prosperity is very much dependent on coordinated planning. This requires Lewisham council and other local authorities, along with key stakeholders, to work together to realise sustainable and equitable growth both within and across their administrative boundaries. The policy establishes a critical link between the Local Plan and the London Plan. It helps to ensure that Lewisham's growth is managed in line with the spatial development strategy for the region.

### **Realising Opportunity Area objectives**

- 3.11. The London Plan identifies two Opportunity Areas within Lewisham that have significant potential to accommodate new investment along with growth in homes and jobs. These are also areas where neighbourhoods, businesses and local residents stand to benefit from focussed regeneration and urban renewal, particularly where deprivation is experienced. These benefits will be realised through the delivery of more healthy and liveable neighbourhoods. This includes more genuinely affordable homes, new workspace, high quality community

facilities and transport infrastructure, along with public realm and environmental improvements. The Opportunity Areas comprise the New Cross / Lewisham / Catford corridor and the area at Deptford Creek / Greenwich Riverside. In recent years there has been a significant amount of investment in these areas, which has been steered by the local planning framework. A number of strategic development sites have now been delivered or are expected to come forward soon, with planning consent granted or construction started. The areas have also benefited from the delivery of new or improved transport infrastructure, public realm and community facilities.

- 3.12. We will continue to seek to deliver the objectives for the Opportunity Areas through the Local Plan, working with the Greater London Authority and other key stakeholders alongside development industry partners and local communities. Additional guidance has been prepared to identify future priorities and opportunities for development and area improvements, including the New Cross Area Framework and the Catford Town Centre Masterplan. The Local Plan reflects this guidance through the spatial strategy and other policies. All future development proposals will be expected to positively engage with the Local Plan and its associated guidance to ensure the Opportunity Areas fully realise their potential, whilst taking account of local area requirements.

Tackling deprivation and ensuring equality of opportunity

- 3.13. It is vitally important that everyone is able to enjoy a good quality of life in Lewisham irrespective of their background, age or ability. We are committed to ensuring that local residents and others are able to benefit from excellent access to high quality and genuinely affordable housing, education and training, and job opportunities, as well as a wide range of community facilities such as parks and health services. Whilst there are many prosperous neighbourhoods in Lewisham there are some localities where access to social and economic opportunities is more limited, and where the impacts of inequality and causes of deprivation are concentrated. Some of these localities are within the 20 per cent most deprived in the country, including in Lewisham's southern neighbourhoods. The Local Plan sets a proactive strategy to coordinate and direct new investment to these areas. It also highlights for our stakeholders and delivery partners the need for targeted interventions to tackle the specific causes of deprivation and to ensure equality of opportunity. This includes investment and supporting programmes in Opportunity Areas as well as the Strategic Area for Regeneration, whether linked to capital or revenue funding. Further details on the strategic approaches to tackle deprivation through the Local Plan are set out in Part Three.

A vibrant and diverse, multi-centred borough

- 3.14. The Local Plan seeks to promote Lewisham as a multi-centred, or polycentric, Borough. This is one that is defined by a well-connected network of complementary, thriving and resilient town centres which act as hubs both serving and linking local communities. This pattern of development is advocated to facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to promote and improve equality of opportunity across Lewisham.

- 3.15. This policy seeks to direct new development to the Borough's town and local centres and their immediate surroundings, especially the major and district centres. These are locations that already benefit from higher levels of public transport accessibility and transport interchanges, along with a core of services and community facilities. Furthermore, there are opportunities to secure the long-term viability of these centres through the introduction of a wider range of uses, including housing, workspace, cultural and community facilities. The Local Plan seeks to optimise the use of land available in and around town centres. This includes diversifying and intensifying uses within them whilst ensuring that the scale of development is commensurate with, and helps to reinforce, a centre's role and function.
- 3.16. For this approach to be successful it is imperative that town centres complement and support but do not compete with one another. Therefore, the Local Plan seeks to build on the unique attributes, character and function of each of the Borough's town and local centres. As these centres will be key focal points for development and investment they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and resilient places.
- 3.17. There are key opportunities at the major town centres of Lewisham and Catford, both of which are located within the Opportunity Area. The London Plan indicates that Lewisham major centre has the potential to be designated as a metropolitan centre in the future. This is owing to its growing influence in the wider sub-region as a transport interchange as well as a significant hub of commercial and community activities. We will seek to facilitate development in such a way as to position the centre to secure this metropolitan centre status within the plan period.
- 3.18. We will also seek to deliver the comprehensive regeneration of Catford major centre as a strategic priority. Catford will continue to play an important complementary role to Lewisham as the principal civic centre in the Borough, supported by its unique cultural offer along with opportunities to deliver additional housing, commercial floorspace and transformational public realm improvements. We have prepared the Catford Town Centre Masterplan to set a future framework and implementation programme for the centre, which should be considered alongside the Local Plan.
- 3.19. Elsewhere, the Borough's district centres will be the focus for growth, renewal and sensitively managed change, aided by investment in strategic infrastructure and other area improvements. This includes the district town centres of New Cross, Deptford, Downham, Lee Green, Forest Hill and Sydenham. Local Centres will also be required to play an integral role in supporting Lewisham's linked network of centres.

#### Connecting communities: corridors for movement and improvement

- 3.20. To achieve a successful multi-centred Borough it is vital that there are legible, high quality, safe and efficient routes both to and between town centres and neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. The

future prospects and viability of Lewisham's town centres will rely heavily on their capability to be accessed safely and easily by all residents, workers and visitors. Also, with a well-connected town centre network, individual centres will be better placed to sustain or evolve their specific roles as the population is enabled to use them with more regularity.

- 3.21. The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road). Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary. These roads include: the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon).
- 3.22. At present these strategic roads prioritise vehicular flows, or their 'link' function, above any 'place' function and potential contribution they may make to the quality of the neighbourhoods and centres they connect with and move through. In addition, the particular qualities of the strategic roads (such as their width and environmental quality) means that they possess their own spatial character as 'corridors' and can therefore appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity. Furthermore, the quality and functionality of these corridors can be improved through development delivering on the Healthy Streets principles, giving priority to pedestrians and cyclists. These principles are covered elsewhere in the plan, including [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).

Strategic infrastructure: the catalyst for growth and investment

- 3.23. In order to achieve the objective of an Open Lewisham it is imperative that all residents are able to share in the opportunities and benefits that growth and regeneration bring. We will therefore continue to work with key stakeholders and partners to deliver the essential infrastructure needed to support and enhance our neighbourhoods. In addition, we will lobby for and seek to secure strategic infrastructure of the type that can act as a catalyst for growth and investment, and which can help the Borough to fully realise its development potential.
- 3.24. There are localities in the Borough, particularly where deprivation is experienced, which could benefit from the investment associated with new development. However opportunities are constrained owing to the lack of infrastructure provision, particularly transport infrastructure. We have prepared "A Vision for Rail"<sup>10</sup> that sets out our priorities to address identified gaps in such provision, and to ensure Lewisham is able to appropriately support London's growth. Of key significance is the Bakerloo Line upgrade and extension, which is supported by the **draft** London Plan. It is proposed that this Underground line is extended from Elephant and

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<sup>10</sup> [Lewisham council - A Vision for Rail \(2017\)](#)

Castle to Lewisham via Old Kent Road and New Cross Gate. This would enable a further extension beyond Lewisham town centre, potentially bringing the Bakerloo Line to Hayes over the long-term, with stations at Ladywell, Catford and Lower Sydenham.

- 3.25. The Bakerloo line extension is essential to supporting Opportunity Area objectives and providing the necessary transport infrastructure to facilitate a significant uplift in homes and jobs in the New Cross / Lewisham / Catford corridor. Furthermore, the later phased extension of the Bakerloo line to the southern part of the Borough is imperative to enable transformative investment and managed change. In particular, the Bell Green and Lower Sydenham area is poised to benefit from such focused investment. This area currently exhibits some of the highest levels of deprivation locally and suffers from low levels of public transport accessibility. However, it also features a number of large sites offering significant development potential if brought forward in a strategically coordinated way. A future Opportunity Area is envisaged for this part of the Borough. The spatial strategy is set with the intent of facilitating investment as a catalyst for growth, to help realise long-term objectives for a more equitable distribution of development and opportunities across the Borough.

Making the best the use of land and space

- 3.26. Lewisham will continue to play a role in accommodating London's future growth. Whilst growth will bring many opportunities and new investment it will also lead to increasing and competing pressure on the use of land. In response to this situation, the Local Plan sets a framework to help ensure that the best use is made of the Borough's limited supply of land and space.
- 3.27. Making the best use of land will mean that land is used more efficiently and flexibly. This includes well-integrated, higher density and mixed-use development in appropriate locations. These locations are principally Lewisham's Opportunity Areas and town centres along with the strategic corridors for movement that connect these places. As well, a more intensive use of employment land and sites will be necessary to meet future needs for workspace and job opportunities.
- 3.28. Making the best use of land will also mean that land and space is used more effectively. This can be achieved through the shared use or co-location of facilities to better meet the needs of the people and groups who use them. A more effective use of land can also occur where buildings and spaces are designed to be adaptable to different users and offer opportunities for use at different times of the daytime, evening and week.
- 3.29. Where appropriately located, higher density and mixed-use developments that positively respond to and enhance the character of the Borough's town centres and neighbourhoods will be supported. This is to help secure their long-term vitality and viability by enabling a complementary cluster, or agglomeration, of uses to develop. A critical mass of people and activities is needed to both generate and support investment, such as for community facilities, public realm enhancements and other area improvements.

- 3.30. This policy seeks the redevelopment of brownfield land, or previously developed land, as a priority. This will ensure that Lewisham's green and open spaces are protected. The Local Plan includes a number of strategic site allocations where requirements have been set to ensure the optimal use of land. These allocations are largely set within the Opportunity Areas, town centres and strategic movement corridors where we will seek to focus development. Further details are set out in Part Three of this document dealing with Lewisham's character areas.
- 3.31. Elsewhere, the Local Plan will support the sensitive intensification of smaller sites throughout the Borough. The development of smaller sites (including on backland and infill sites, as well as residential extensions) will be important to meeting future needs, particularly for housing. We will prepare guidance documents to support the plan policies and to help ensure that development of this kind is appropriate to its location and wider setting.

#### Celebrating Lewisham's diversity and enhancing its distinctiveness

- 3.32. Lewisham comprises many neighbourhoods and places, all of which have distinctive features. The historic, cultural, natural and built environment contributes significantly to shaping local character. It also influences how people experience the Borough and informs their sense of place and identity.
- 3.33. We recognise that good design is integral to good planning. The Local Plan therefore sets a clear framework for integrated place making, and requires all proposals for new development to be delivered through a design-led process. This means that new development must be based on an understanding of the site context and positively respond to the Borough's local distinctiveness. The use of the design-led process will help to ensure that those unique and valued features of our communities remain at the heart of the spatial strategy, and are fully considered in planning decisions.
- 3.34. Lewisham has been shaped by its historical development. It will continue to evolve in the context of London's growth and new technological advances. However, respecting local character and accommodating change should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough. At the same time, it should assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods. The Lewisham Characterisation Study (2019) has been prepared by the council in collaboration with the local community, and assists in setting out some of the defining features of the Borough. The study has been used to inform the Local Plan approach for integrated place making, including the planning priorities for Lewisham's neighbourhoods and areas. Part Three of the Local Plan sets out further details in this respect.

#### A greener, more resilient borough

- 3.35. The council takes seriously its responsibility to promote and secure sustainable development, as evidenced by our declaration of a climate emergency and commitment to prepare an action plan. Sustainable development means development that meets the needs of the present without compromising the ability

of future generations to meet their own needs.<sup>11</sup> Environmental stewardship is an integral part of this. London's natural assets are an irreplaceable resource and need to be preserved and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

- 3.36. The Local Plan sets a framework for managing growth and change with environmental considerations fully integrated into the planning and development process. It sets out our approach to protecting and enhancing the local network of green infrastructure, open spaces, the water environment and biodiversity. As well, it provides the local land-use strategy for mitigating the Borough's impact on global climate change, whilst ensuring local neighbourhoods are well placed to adapt to the consequences of it.
- 3.37. The spatial strategy responds to the climate emergency by seeking a more compact and efficient urban structure, one with a well-linked network of places and finer integration of land uses and activities. It does not necessitate that development is directed to greenfield sites, ensuring that our green spaces along with the biodiversity and habitats within them are protected. It also enables opportunities to decrease carbon emissions, such as by reducing reliance on automobiles and the need to travel long distances, as well as enabling the conglomeration of uses to support district heating and other sustainable energy options. These are just a few of the benefits offered by the approach.
- 3.38. Furthermore, as detailed elsewhere in the plan, all development proposals will be expected to demonstrate through the design-led process how they will contribute to protecting and enhancing the environment, delivering net gains in biodiversity and green infrastructure wherever possible, whilst also providing for safe, healthy and resilient communities.

**MAP: KEY DIAGRAM**

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<sup>11</sup> [The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations](#)

DRAFT

# Part Two

Managing development

## 4 Introduction

- 4.1. Part Two of the Local Plan forms a key part our approach to positively managing new development across the Borough. It includes policies that will help to facilitate the delivery of Good Growth and sustainable development locally, whilst ensuring Lewisham's distinctiveness is recognised, celebrated and enhanced. The following section sets out strategic planning policies that establish priorities across a range of number of topic areas. These are supplemented with additional policies that include detailed standards and requirements that all new development proposals will be required to comply with.
- 4.2. It is important that the following Part Two policies below are not considered in isolation of other elements of the Local Plan, which must be read as whole. All development proposals should address how they will contribute to the achievement of the Local Plan's objectives and the spatial strategy for the Borough, as set out in Part One, and further support the priorities for Lewisham's neighbourhoods and places included in Part Three.

## 5 High quality design

### QD 1 Delivering high quality design in Lewisham

Using the design-led approach

- A. All new development must contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham by following a design-led approach. This requires the consideration of design options at the early stage of the development process informed by an understanding of the local context, including through effective engagement with the local community. These design options should then be used to determine the most appropriate form of development that responds to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough, also taking into account existing and planned infrastructure capacity.

Distinctive and valued places

- B. Lewisham is a diverse Borough comprising many neighbourhoods with distinctive identities and characteristics. All development proposals must demonstrate an understanding of the site context and positively respond to local distinctiveness by delivering buildings, spaces and places that enhance local character as well as promote inclusive communities.
- C. Development proposals will be supported where they reinforce and enhance the special and distinctive visual, historical, environmental, social and functional qualities

of buildings, spaces and places that positively contribute towards local identity, character and sense of community.

- D. To successfully respond to local distinctiveness development proposals should be designed to address:
- a. Natural features including trees, landscape, topography, open spaces and waterways;
  - b. The prevailing or emerging form of development (including urban grain, building typology, morphology and the hierarchy of streets, routes and other spaces);
  - c. The proportion of development (including height, scale, mass and bulk) both in the immediate vicinity of the site and the surrounding area;
  - d. Building lines along with the orientation of and spacing between buildings;
  - e. Strategic and local views, vistas and landmarks;
  - f. Townscape features;
  - g. The significance of heritage assets and their setting; and
  - h. Architectural styles, detailing and materials that contribute to local character.

#### Places for people

- E. All new development should put people at the centre of the design-led process, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to all. Proposals should demonstrate an understanding of how people engage with and experience their surroundings, and positively respond to this by delivering healthy and liveable neighbourhoods.
- F. Development proposals will be supported where they help to facilitate good physical and mental health and positively contribute to the wellbeing of the population.
- G. To support health and wellbeing of the population, and to create inclusive environments that help to foster community cohesion, new development must be designed to ensure:
- a. Buildings and spaces are inclusive, intuitive to use, safe and secure;
  - b. Delivery of a high quality and effectively managed public realm that both encourages and enables convenient movement by active travel modes, including by responding to people's movement patterns and desire lines in an area;
  - c. Positive and active frontages that generate visual interest and interface well with the public realm, particularly at the street-level;
  - d. Provision of well-integrated, dedicated space and equipment for relaxation, social interaction and physical activity, including space for play and informal recreation; and
  - e. A high standard of amenity is provided, including by preventing and/or mitigating impacts of noise and poor air quality.

#### Well-functioning and resilient places

- H. The form and layout of development should be designed to secure a coherent and appropriate functional relationship with all land uses and spaces within the site and its surroundings, also taking into account the needs of the users of the development. Proposals should have particular regard to:
- a. The integration of the development within the site and the wider locality, particularly to secure a positive relationship with neighbouring properties and land uses;
  - b. The need to ensure that sites and neighbourhoods are legible and well-connected, and for development to facilitate active modes of travel and the use of public transport; and
  - c. The efficient servicing and effective management of buildings and the public realm.
- I. In order to contribute to well-functioning neighbourhoods and places, new development must be appropriately supported by infrastructure (including transport, community and green infrastructure). Proposals will be expected to consider, and be linked to, the provision of future planned levels of infrastructure along with the timing of the delivery of this infrastructure. Where there is insufficient capacity of existing infrastructure to support a development proposal, applicants will be required to work with infrastructure providers to ensure sufficient capacity will exist at the appropriate time, including through the phasing of development.
- J. Development must be designed to assist in mitigating climate change and also make neighbourhoods and properties more resilient to its impacts through adaption measures. Proposals should be designed and constructed to achieve high sustainability standards, including by seeking to maximise opportunities for urban greening, having regard to the Local Plan [Sections 10 \(Green infrastructure\) and 11 \(Sustainable design and infrastructure\)](#).

#### Delivering high quality development

- K. Development proposals must submit a Design and Access Statement to demonstrate how they have followed the design-led approach to deliver high quality development in accordance with (A-J) above.
- L. Development proposals will be expected to have regard to and positively address:
- a. Supplementary Planning Documents and Guidance published by the council and the Mayor of London respectively, along with other good practice guidance;
  - b. Feedback from the council including through its Pre-application Advice Service and where appropriate, Lewisham's independent Design Review Panel.
- M. Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site, as well as to consider design options that positively respond to this context. Development proposals that can demonstrate early, proactive, inclusive and effective

engagement with the local community and other key stakeholders will be considered more favourably than those that cannot.

### **Explanation**

- 5.1. The Local Plan sets out an ambitious framework to facilitate and coordinate significant new investment in the Borough, as well as to deliver Good Growth that benefits our neighbourhoods and communities of people. To realise the Vision for Lewisham and achieve the plan's strategic objectives, it is imperative that all new development delivered is high quality development. This policy advocates that a design-led approach is used in order to ensure that development successfully responds to its local context. The need for this approach is a common thread that runs throughout the remainder of the Local Plan policies.
- 5.2. All proposals must clearly demonstrate that the design-led approach has been used to inform the development. This requires that, from the very start of the planning and design process, careful consideration is given to the distinctive features of Lewisham's neighbourhoods, buildings and other spaces that shape local character and positively contribute to people's sense of place. It also requires new development to respond to the ways in which people use and experience buildings and spaces, along with the impacts the built environment has on the health and wellbeing of the population. Finally, the design-led approach requires that proposals address the need for development to function effectively, both on its own and in relation to the buildings and spaces around it. Regardless of the nature or scale of development, all proposals must use this approach to ensure beneficial outcomes for Lewisham's people and places, as well as the natural environment and wider global climate.
- 5.3. The design-led approach must begin with an understanding of the site context. This context includes the distinctive character of the site along with its wider setting, including the neighbourhood within which it is situated. The Lewisham Characterisation Study (2019) has been prepared to help inform the preparation of the Local Plan and to support its implementation. It should be referred to as a useful starting point for considering development proposals, and will assist in providing insight into the key features of the Borough's historical, built and natural environment. This is only one point of reference, however, and proposals will be expected to demonstrate a comprehensive understanding of the site context and clearly articulate how the development has been designed to respond to this in a positive way. Part 3 of the Local Plan sets out strategic priorities and policies for the Lewisham's character areas. It has been prepared to help guide development and ensure it is fundamentally place-responsive, by being designed to address and enhance the distinctive qualities of Lewisham's neighbourhoods and the diversity of local communities.
- 5.4. The successful delivery of the spatial strategy for will require that proposals optimise the capacity of sites. There is a need to accommodate a significant amount of growth within the Borough over the plan period. This growth needs to be carefully managed in order to ensure the delivery of inclusive, healthy and liveable neighbourhoods that are well supported by infrastructure. The design-led approach

is integral to ensuring that sites are developed to an optimum capacity that is responsive to the site's context and the supporting infrastructure available or planned to be delivered. Further details are set out in [Policy QD6 \(Optimising site capacity\)](#).

#### Delivering high quality development

- 5.5. We will publish a package of supplementary planning documents and other guidance to support implementation of the Local Plan, and to ensure clarity in our expectations for new development. This includes planning guidance for key areas and strategic sites, management of the historic environment, specific design matters and planning obligations. Key guidance documents are signposted throughout the Local Plan. This local guidance should be read in conjunction with the London Plan supplementary planning guidance and other sources of good practice guidance, where appropriate, including that published by Historic England. Applicants are strongly advised to refer to the council's planning website for the latest available information on Lewisham's adopted and emerging guidance. Proposals will be expected to have regard to and positively engage with these documents, which will be a material consideration in planning decisions.
- 5.6. We will work positively and proactively with development industry partners and other key stakeholder to secure the delivery of high quality design in Lewisham. Applicants are encouraged to engage with the council at the early stages in the planning and design process. This will help to ensure that development proposals are appropriate for their location, positively respond to the local context and contribute to the delivery of the spatial strategy for the Borough. Through early engagement we will also endeavour to assist applicants with identifying potential funding opportunities available to boost the delivery of genuinely affordable housing on new development schemes, as set out in [Policy HO3 \(Genuinely affordable housing\)](#).
- 5.7. Pre-application meetings are a useful way to establish the land use principles for development sites, and to identify and discuss any key matters that need to be addressed within a particular scheme. This includes the consideration of routes to resolving planning issues or other potential conflicts prior to the formal submission of a planning application. Pre-application meetings are also useful information sharing exercises, and provide the council with opportunities to support development industry partners in linking up with other corporate services and service areas. For instance, we can flag resources available to help with sourcing local labour for construction projects, including apprenticeships.
- 5.8. We are proud to support an independent Design Review Panel (DRP) in Lewisham as part of our positive approach to working with delivery partners. The DRP is formed of professional design experts who meet regularly to review schemes and provide feedback to applicants. While the panel does not have decision-making powers, it serves as an advisory body helping to achieve positive outcomes for the built environment and Lewisham's communities. Comments from the panel are fed into the assessment of pre-application schemes, planning applications and appeals.

- 5.9. Development proposals should be brought to the panel as early as possible within the design process in order to ensure a productive and beneficial outcome for all parties. By bringing a development to the panel early, design teams have an appropriate time to respond to panel advice and have a better chance to address design concerns prior to application – thus providing more assurances for the developer and helping to de-risk the planning application. The panel assists and encourages developers and their design teams to deliver high quality design in their proposals. It is expected that all major and significant development will be brought to the panel during the planning process, ideally at pre-application stage.
- 5.10. Applicants should work closely with local communities and others likely to be affected by new development to understand the local and distinctive context of the site and its setting, as well as to consider design options that positively respond to this context. Community consensus and agreement on proposals is not in itself a reason for granting planning consent, as all proposals will need to demonstrate compliance with the Local Plan policies. However applicants working with the community through the design-led process are more likely to arrive at development proposals that respond to the distinctive qualities of neighbourhoods and places, based on a more thorough understanding of the local context, and therefore support the delivery of the spatial strategy. Development proposals that can demonstrate early, proactive, inclusive and effective engagement with the local community and other key stakeholders will be considered more favourably than those that cannot.

## QD 2 Inclusive and safe design

- A. It is imperative that people of all backgrounds, ages and abilities are able to move with ease throughout Borough, and within buildings and spaces, and to feel safe in their surroundings wherever they are. All new development will be required to contribute to delivering inclusive, accessible, safe and secure environments in Lewisham.
- B. Development proposals must positively respond to the diversity and varied needs of Lewisham's population by:
- Ensuring buildings and spaces are designed to be entered, used and exited safely, easily and with dignity for all;
  - Ensuring buildings and spaces are designed to be inclusive to all and do not unnecessarily restrict or prevent access and use, including by occupants of different tenure types;
  - Incorporating measures that allow for easy adaptation of buildings and spaces to help meet the different and changing needs of users over the lifetime of the development;
  - Delivering a high quality public realm, in line with [QD 3 \(Public realm and connecting places\)](#); and
  - Having regard to 'Secured by Design' principles.
- C. Gated forms of development, particularly for new housing development, are not considered to support inclusive and safe design principles and will be strongly

resisted. The use of gates must be justified for reasons of public health and safety. Where gates are considered by the council to be acceptable in principle, it will require these to be of a high quality design and sensitively integrated into the development. Planning contributions and/or legal agreements may be used to secure the appropriate management of gates, and to help ensure they do not unnecessarily restrict public access to buildings and spaces, including the public realm.

#### Accessible and inclusive housing

- D. To help ensure that housing is designed to meet the different requirements of Lewisham's resident population development proposals will be expected to ensure that:
- a. At least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'; and
  - b. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.
- E. Where housing development includes provision of communal private amenity space or facilities this should be made available for access by all residents occupying the development, regardless of tenure.

#### Adapting historic buildings and other heritage assets

- F. Where adaptations to an historic building or other heritage asset is proposed to make the building or space more inclusive and safe, proposals will be supported where they preserve or enhance the significance of the asset and its setting.

### **Explanation**

- 5.11. The built environment influences the quality of life of everyone in Lewisham whether they are living, working or visiting the Borough. The layout and design of buildings and spaces, including the public realm, can significantly impact on people's ability to move with ease around the Borough and to live independent and dignified lives. Inclusive and safe design principles should therefore be considered at the early stage in the design-led process, ensuring that people of all ages and abilities are able to benefit from high quality, accessible, safe and secure environments.
- 5.12. Whilst inclusive design includes consideration of wheelchair users it is important to emphasise that it extends beyond this particular group. Inclusive design must consider the needs of the wider population and the different groups of people that are likely to access and use buildings and spaces, and move through the public realm. We will expect proposals to demonstrate how they have considered and addressed inclusive design principles, taking into account the nature and location of development.
- 5.13. Development proposals should take into account and positively respond to the diverse needs of Lewisham's population, including families and those in groups with protected characteristics. Wherever possible buildings and spaces should be

designed to be adaptable to the different and changing needs of users over the lifetime of development. This will help to avoid or offset costly alterations that may be required later on. Applicants are encouraged to refer the latest standing guidance on inclusive design, including British Standards documents BS8300-1:2018 (Design of an accessible and inclusive built environment. External environment. Code of Practice. January 2018) and BS8300-2:2028 (Design of an accessible and inclusive built environment. Buildings. Code of Practice. January 2018).

- 5.14. We will strongly encourage the use of ‘Secured by Design’ principles to help reduce crime and improve perceptions of safety. This includes measures to encourage passive surveillance, including through the integration of active frontages and other interventions to promote street level activity. Provision of easily accessible, legible and appropriately illuminated access and entrance points is also important consideration for all types of development. Development proposals will be expected to demonstrate that they have engaged with the latest standing guidance on ‘Secure by Design’, or equivalent guidance.

#### Accessible and inclusive housing

- 5.15. In line with the [draft London Plan](#) we will expect that all new development meets the strategic target for provision of wheelchair user dwellings and ensuring accessible and adaptable dwellings, in accordance with Building Regulations M4(3) and M4(2) respectively. For the avoidance of doubt, this policy applies to dwellings that are created via works to which Part M volume 1 of the Building Regulations applies. To comply with the Building Regulation requirements appropriate step-free access into the dwelling will need to be provided. This policy helps to support our strategic approach to meeting housing needs for older people through adaptable housing, as set out in [Policy HO5 \(Accommodation for older people\)](#)
- 5.16. In considering the suitability of a site for wheelchair accessible or user dwellings we will have regard to individual site circumstances. This is because flexibility may need to be applied to meet policy objectives (e.g. to enable the requirement to apply to 10% of habitable rooms where a better outcome is provided in terms of provision of larger units). Discretion may also be needed in exceptional circumstances when provision of a lift to dwelling entrances is not technically feasible, such as with some constrained infill sites or flats above shops. We will seek to secure appropriate provision for individual developments, including through the use of planning conditions.
- 5.17. To support our objectives for delivering inclusive communities, all development should be designed to promote social interaction and equality of access to facilities and services. This includes inclusive, safe and welcoming access to buildings, particularly front entrances and amenity spaces. Proposals should avoid the use of separate main entrances. Where private communal amenity space is provided in new housing development, this must be made accessible to all residents occupying the building. Details of access, management and building maintenance should be included with planning applications. We will strongly resist

proposals that unnecessarily restrict or prevent access to buildings or communal amenity space, including for reasons of housing tenure.

Adapting historic buildings and other heritage assets

- 5.18. Non-standard approaches may be required when adapting historic buildings and other heritage assets, and current design standards should be considered flexibly alongside the particular heritage significance of a building or asset. We will work with applicants to help ensure that any alterations or changes proposed to make heritage assets safer and more inclusive do not harm their significance, in line with the NPPF and Local Plan policies in [Section 6 \(Heritage\)](#). Where historic buildings, spaces or other features are likely to be affected by development, careful consideration will need to be given to ensure that new design responds sensitively to its context, and does not adversely impact on those elements that contribute to the significance of the asset. Applicants are advised to consult relevant guidance on this matter for support, including the latest standing guidance published by Historic England.

### QD 3 Public realm and connecting places

- A. Public realm must be designed and maintained to a high quality standard. It should help to ensure inclusive, safe, accessible, attractive and well-connected places and spaces that make a positive contribution to the neighbourhoods in which they are located. Development proposals are encouraged to create new public realm, or enhance existing public realm, wherever opportunities arise.
- B. Public realm should be delivered through the design-led process, having regard to the principles in [Policy QD1 \(High quality design\)](#). In responding to these principles, development proposals must demonstrate an understanding of how the public realm functions both in its immediate and wider local context, and how this contributes to local distinctiveness and creating a sense of place. Consideration should be given to the ways in which people use the public realm and how its design will influence their experiences within it.
- C. The movement and connective function of the public realm must be addressed to ensure that development provides for coherent relationships and good connections within and between sites and neighbourhoods, and maximises opportunities for creating new connections. Public realm should be commensurate with the role and function of places and the highway network, and reflect the priority given to movement by walking, cycling and the use of public transport, in line [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).
- D. The movement and connective function of the public realm must be addressed, including legibility and permeability within the site as well as its immediate and wider surroundings. This requires particular attention to the movement patterns and desire lines of pedestrians and cyclists, as well as the accessibility needs of other users. Consideration should be given to the location of street crossings and other safe

access routes such as dedicated cycle lanes, underpasses and, where appropriate, railway arches.

- E. Development proposals will be expected to enhance the movement and connective function of the public realm by maximising opportunities to:
- a. Improve connections to existing or planned strategic transport and community infrastructure, including open space;
  - b. Enhance and where appropriate help to reinstate connections that make a positive contribution to the locality, including those that are of local importance and historic significance; and
  - c. Avoid or remove barriers that unnecessarily impede or restrict movement and accessibility, and adversely impact on public safety.
- F. Development proposals must demonstrate how the public realm will be well integrated with and positively relate to the spaces, buildings and land uses within the site and its surrounds. Development should be designed to establish or reinforce a clearly defined public realm that helps to support the function of different uses within an area and protects local amenity.
- G. Development proposals should deliver a vibrant public realm that promotes opportunities for relaxation, social interaction and physical activity. Proposals should seek to create welcoming environments that attract people into public spaces and encourage their enjoyment within them during different times of the day and night, and throughout the year. This includes consideration of how the local microclimatic impacts on people's health and comfort. Where appropriate, proposals should make provision for:
- a. Public conveniences, including toilets and changing facilities, particularly for families with children and those with specialist needs;
  - b. Free drinking water fountains;
  - c. Sensitively integrated lighting;
  - d. Shading and shelter to protect and provide comfort from direct sunlight, rain and wind;
  - e. Public art;
  - f. Benches and other types of seating;
  - g. Formal and informal play space, addressing the needs of people of different ages and abilities;
  - h. Adaptable space to support events and activities (such as markets, civic and cultural events) and infrastructure to support these, such as connections to power and water.
- H. Public realm should be sustainability designed and constructed, including by maximising opportunities for urban greening and mitigating the impacts of climate change, having regard to Local Plan [Sections 10 \(Green infrastructure\) and 11 \(Sustainable design and infrastructure\)](#). Priority should be given to the use of high quality and durable materials, with permeable or semi-permeable surfaces integrated wherever possible.

Public art

- I. Development proposals, particularly for major development, should investigate opportunities to integrate public art to enhance the legibility of the public realm, enhance the distinctiveness of buildings and spaces, and to help to foster a sense of place. The use of local artists for public art commissions is strongly encouraged.
- J. Public art, including installations, proposed to be integrated as part of a development, or within the public realm, should be appropriately located in a prominent position and be sensitively sited and/or fixed to a building in a manner that:
  - a. Positively responds to the site context and local character, including historic character and the significance of heritage assets;
  - b. Enhances the legibility of the public realm; and
  - c. Does not adversely impact on amenity.
- K. Where public art is proposed to be provided, the location, siting and general design of the art, along with long-term management and maintenance arrangements, must be agreed by the council prior to its installation.

#### Effectively managing the public realm

- L. Development proposals will be expected to ensure that appropriate management and maintenance arrangements are in place for the public realm. Where provision is made for privately owned public space this should be operated in the same manner as public space, ensuring equality of access for all. Management Plans will be required for Major development and other proposals with significant elements of public realm. Planning contributions and/or legal agreements may be used to secure the appropriate management of the public realm.

#### **Explanation**

- 5.19. Public realm consists of all the publicly accessible space between buildings, whether public or privately owned. This includes elements of the transport network (such as pavements, streets and cycleways), amenity spaces (such as station forecourts, squares, play areas and open spaces) and internal spaces in buildings open to and frequented by the public (such as station concourses, shopping malls, markets and cultural facilities).
- 5.20. Public realm performs a key role in shaping the character of Lewisham's neighbourhoods and influencing the function of the buildings and spaces within them. It also factors significantly in the population's physical and mental health and wellbeing, and quality of life. This is because the public realm affects how people experience the Borough through their movements and daily activities. It also impacts on the opportunities available to people of all ages and abilities to lead healthy and active lifestyles.
- 5.21. It is important that the different elements of the public realm are not considered in isolation of each other or the people and places they support. Rather the public realm should be seen in a holistic way, as a series of connected routes and spaces that together help to form the urban and social fabric of the Borough. The

public realm links Lewisham's places and neighbourhoods with one another, enabling people to access homes, jobs, community facilities, services and leisure and recreational opportunities, whether within the Borough or elsewhere.

- 5.22. Public realm must be considered at the early stage of the design-led process. This will help to ensure that all people are able to move easily and conveniently without impediments, and that they benefit from access to safe and secure, attractive and healthy environments. The design of development should be informed by an understanding of how people currently use, or will be expected to use, the public realm. Placing people at the heart of the design process is more likely to result in positive outcomes, particularly in terms achieving inclusive and well-functioning spaces and places.
- 5.23. In addressing the public realm, development proposals should prioritise the movement of people by active travel modes (such as walking and cycling) and the use of public transport, in line with the Healthy Streets approach. This policy should therefore be read in conjunction with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#), which sets out further details in this respect. New and enhanced public realm will help to support Local Plan objectives to facilitate a significant shift in travel away from cars to more sustainable transport modes. Opportunities should be explored to improve connections to existing and planned strategic infrastructure, particularly cycle routes and stations, as well as community facilities.
- 5.24. Public realm should be designed to reflect, reinforce and enhance the distinctive features of Lewisham's neighbourhoods that contribute to shaping local character and identity. Development should help to create welcoming, attractive, vibrant and healthy places where people have ample opportunity to relax, socialise and enjoy leisure pursuits at different times of the day, evening and night time and throughout the year. This is especially important within and around Lewisham's town centres, which are key focal points for civic and public life. There are wide range of facilities that can be integrated into development to make the public realm more inclusive, inviting and comfortable. This includes free-to-use public conveniences, seating and play space.
- 5.25. Where appropriate, opportunities should be taken to make provision for adaptable space to support different types of activities, such as markets, and cultural and civic events. This is particularly for major development proposals or other developments incorporating or located adjacent to larger public open spaces, such as squares and station forecourts. Development should include, or be designed to enable connections to infrastructure to support these activities, such as electrical outlets and water.
- 5.26. All public realm should be designed to achieve high sustainability standards. The Local Plan sets out policies and guidance to help ensure that proposals address environmental considerations through the design, construction and operation stages of development. This includes policies in Section 10 (Green infrastructure) and Section 11 (Sustainable design and infrastructure). In particular, development proposals should maximise opportunities to incorporate urban greening and sustainable drainage measures within the public realm. This will help to ensure a

positive response to climate change resilience, and also enhance the amenity value of the public realm.

- 5.27. Without proper management the public realm can deteriorate over time, compromising its functional and amenity value and diminishing the important contribution it makes to sustainable neighbourhoods. In delivering high quality public realm, proposals should be designed to prevent against the need for excessive site management requirements, where appropriate. For example, opportunities should be taken to use durable materials, select drought tolerant, perennial species for tree planting and other greening measures, and create naturalised landscaping. These interventions may also provide a cost-efficient way to maintain a high quality public realm over the lifetime of the development.
- 5.28. It is imperative that the public realm supports inclusive communities. Private ownership and management of the public realm is not in itself a cause of poor mobility, exclusion and segregation. We will seek to avoid inappropriate controls on public realm to ensure it is genuinely and publicly accessible for all local residents and visitors to the Borough, whilst recognising the need for reasonable measures to address liability and health and safety. The council will work with developers to ensure that public realm is positively managed so that the standards of public access and use are maintained over the lifetime of the development, including through the use of planning conditions and obligations.

## QD 4 Building heights

- A. The building height of development must positively respond to the distinctive character of Lewisham's neighbourhoods. Building heights should be appropriate in scale, taking account of the character of a site's immediate and wider context and the requirement to deliver high quality design in line with [Policy QD1 \(High quality design\)](#).
- B. Proposals for taller buildings that project above the height of adjoining properties and/or the prevailing height of buildings and structures in the immediate and surrounding area will only be supported where they:
- Are of an exceptional design and architectural quality;
  - Are sensitive to the site's context, ensuring that development does not excessively project above the streetscape and townscape or adversely impact on the visual amenity of it;
  - Protect strategic and local views, vistas and landmarks, including strategic background views, having regard to [Policy QD5 \(View management\)](#);
  - Preserve or enhance the significance of heritage assets and their setting; and
  - Will not result in adverse impacts on local character and the amenity of neighbouring properties, whether individually or cumulatively.
- C. Where the prevailing height of buildings and structures adjoining a site, as well as its immediate and surrounding area, is expected to evolve in accordance with the spatial strategy for the Borough and/or consented development(s), proposals for taller

buildings will be considered having regard to the emerging context and criteria QD4.B(e)-QD4.B(f) above.

#### Tall buildings

- D. Within Lewisham tall buildings are defined as buildings that cause a significant change to the skyline and which:
- a. Are 30 metres or more in height, except in the designated Thames Policy Area where they are buildings 25 metres or more in height; or
  - b. Are significantly taller than the prevailing height of buildings in the immediate and surrounding area.
- E. Tall buildings will only be considered acceptable in-principle in the locations identified in **Figure X** as being appropriate for tall buildings.
- F. Where appropriately located in line with (D) above, proposals for tall buildings will be required to demonstrate that the development:
- a. Positively contributes to delivery of the spatial strategy for the Borough;
  - b. Is of an exceptional design and architectural quality;
  - c. Is designed with building heights that are sensitive to the site's immediate and wider context, including the distinctiveness of Thames Policy Area, in line with [Policy LNA4 \(Thames Policy Area and Deptford Creekside\)](#);
  - d. Will not result in any adverse visual, functional, environmental and cumulative impacts, having regard to and complying with the requirements of [draft London Plan Policy D8 \(Tall Buildings\)](#);
  - e. Makes a positive contribution to the townscape and skyline;
  - f. Protects strategic and local views, vistas and landmarks, including strategic background views, having regard to [Policy QD5 \(View management\)](#); and
  - g. Provides a high quality public realm in line with [Policy QD3 \(Public realm and connecting places\)](#). Where appropriate, development will be required to make provision for free to enter, publicly-accessible areas that are incorporated into the building.
- G. Tall buildings must be delivered through a masterplan process in order to ensure that they are appropriately located both within a site and wider locality, designed to a high quality standard and effectively managed.

#### Explanation

- 5.29. This policy sets out our approach to positively managing the development of tall and taller buildings in the Borough. Taller buildings are those that project above the prevailing heights of buildings and structures within a site's immediate and surrounding area (normally, but not exclusively, 2 to 3 storeys above). Tall buildings are defined as buildings that are 30 metres or more in height in Lewisham, except in the designated Thames Policy Area where they are defined as buildings 25 metres or more in height. Tall buildings also cause a significant change to the skyline. By definition, and for policy implementation, taller buildings are not tall buildings.

- 5.30. In order to facilitate the delivery of the spatial strategy for the Borough we will seek to ensure that the development of sites is optimised when opportunities arise. This includes support for well-designed and sensitively integrated higher density development that positively responds to its local context. It is important to emphasise that higher density does not imply that tall buildings are necessary. Higher density can be delivered through a wide range of site layouts and building typologies, including mid-rise developments that are reminiscent of historic mansion blocks but with modern specifications.
- 5.31. However it is recognised that tall and taller buildings can support strategic objectives for optimising the use and capacity of land, particularly to deliver wider public benefits. This includes provision of new housing to meet local needs, including genuinely affordable housing, along with employment floorspace, community facilities and public realm enhancements. Exceptionally designed and appropriately located tall and taller buildings with higher densities can have a role to play in delivering good growth. Whilst acknowledging that London's skyline has and will continue to evolve over time, there remains an imperative to protect and enhance the distinctiveness and character of Lewisham's neighbourhoods.
- 5.32. Irrespective of their extent and scale, tall and taller buildings are prominent visual features that can have significant impacts on the London skyline, the character of local neighbourhoods as well as the amenity of residents, visitors and the natural environment. Where buildings are appropriately sited and designed, they can help people to navigate through the Borough by providing reference points and emphasising the hierarchy of places (including by creating or reinforcing wayfinding markers to nodes of cultural or civic activity and transport interchanges). However inappropriately located, poorly sited and designed tall and taller buildings can have detrimental impacts both on the immediate area and wider area. These impacts may include the blocking of established views and vistas or landmarks, harm to heritage assets and their setting, disturbance to the character and visual amenity of streetscapes and townscapes, and the introduction of adverse microclimate conditions such as wind tunnels. Poorly designed buildings can also adversely impact on community safety as well as the mental and physical health and wellbeing of the population.
- 5.33. All proposals for tall and taller buildings must have a clear urban design rationale and should be of an exceptional design and architectural quality. They should also be located and sited in a manner that ensures that development will positively contribute to local character and high quality living environments. This policy should be read in conjunction with other Local Plan policies, including [Policy QD1 \(High quality design\)](#), which set the requirements for delivering high quality, design-led development across the Borough.
- 5.34. Proposals for taller buildings assessed against Policies QD4 (A) and (B) must demonstrate a clear understanding of the site context, including the historical pattern of development in a locality. The reference point for the prevailing height of buildings or structures will vary on a case-by-case basis, even within a neighbourhood or locality. Not all existing tall or taller buildings will be appropriate references for new development. For example, some tower blocks built in the

1960s and 1970s detract from the historical townscape features within a neighbourhood, and are today considered not to make a positive contribution to local character. Furthermore, the cumulative impact of taller buildings within a site or locality will be an important consideration. Applicants are strongly encouraged to refer the Lewisham Characterisation Study (2019), Conservation Area Appraisals and relevant Supplementary Planning Documents to develop an understanding of the site context and development opportunities. Design and Access statements should clearly set out what features of the built and natural environment have been used as reference points to inform the design and building height of proposals, as part of the contextual analysis.

- 5.35. There may be locations where the prevailing heights of buildings adjoining a site and in its immediate and surrounding area may be expected to evolve over time. For instance, there are areas where the Local Plan, through the spatial strategy, provides support for the sensitive intensification of sites and areas (such as along identified strategic corridors or within major town centres) or seeks to optimise the use of land through comprehensive redevelopment of strategic sites (i.e. site allocations). Furthermore, there may be consented schemes which will influence the existing character of a site or area, once implemented. We will seek that proposals for taller buildings appropriately respond to the emerging context of a site and its wider setting, taking into account the need for new development to be sensitive to its context whilst supporting the delivery of the spatial strategy.
- 5.36. Careful consideration will need to be taken with proposals for tall buildings given their visual prominence and range of potential impacts on the skyline, local neighbourhood and wider area. The Lewisham Characterisation Study (2019) and Tall Buildings Study (2020) include detailed assessments of local character and have informed the identification of locations considered suitable for tall buildings, as set out in **Figure X**. However, this in-principle support does not mean that all proposals for tall buildings will be acceptable in these areas of the Borough. Proposals will be considered on their own merits, taking into account individual site circumstances and the cumulative impacts of the development of tall and taller buildings in a locality. We may seek to assess the individual and cumulative impact of proposals using graphic 3D modelling, such as enabled by VU.CITY software, and applicants will be required to submit technical information to support this analysis.
- 5.37. **Draft London Plan Policy D8 (Tall buildings)** sets out detailed requirements and criteria against which tall building proposals will be assessed in Lewisham. This includes consideration of the visual, functional, environmental and cumulative impacts of development. Through the design-led process all proposals for tall buildings will need to provide a sufficient level of information to demonstrate that potential impacts have been suitably identified and adequately addressed. Proposals will be strongly resisted where they would result in unacceptable visual, functional, environmental and cumulative impacts that cannot be avoided or appropriately mitigated.
- 5.38. The World Heritage Site of Maritime Greenwich is an important consideration for tall and taller buildings. There are riverside locations within the Borough that have

been identified as being potentially sensitive to tall buildings.<sup>12</sup> The Maritime Greenwich World Heritage Site Buffer Zone is considered inappropriate for tall buildings.

- 5.39. In addition, proposals for tall buildings will need to be accompanied by a site wide masterplan. This will help to ensure a rigorous design-led process is applied and that the development is effectively managed over its lifetime. Where appropriate, the site-wide masterplan will need to refer and positively other area-wide masterplans.

#### MAP – LOCATIONS APPROPRIATE FOR TALL BUILDINGS

### QD 5 View management

- A. There are a number of strategic views in the Borough, including London Strategic Views and Lewisham Local Views, which help to define the character of London and contribute to local distinctiveness. These strategic views, including their Protected Vistas, will be designated and positively managed in line with the London Plan and associated London View Management Framework.
- B. Local Landmarks within the Borough are strategically important to Lewisham's distinctiveness. Designated Local Landmarks, along with the vistas towards these, will be positively managed.
- C. Development proposals must not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of Strategic Views and Local Views, including their protected vistas and landmarks. Development should also seek to preserve or where possible enhance a viewers' ability to recognise and appreciate the landmark elements within these views.
- D. Development proposals affecting Strategic Views, Local Views and Local Landmarks will be assessed having regard to their contribution to enhancing local distinctiveness and:
  - a. The need to ensure there is no detrimental impact on the foreground, middle ground and background of the designated view; and
  - b. Compliance with the principles and policies for managing views, as set out in [draft London Plan Policy HC4 \(London View Management Framework\)](#).
- E. The design-led process should be used to explore opportunities to enhance public access to viewing locations within the Borough, and to create new local views and vistas, particularly where the comprehensive redevelopment of sites is proposed.

#### Explanation

- 5.40. There are a number of views that make an important strategic contribution to the distinctiveness and character of Lewisham and London. These views help to

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<sup>12</sup> Important Views and Tall Buildings: Maritime Greenwich, A World Heritage Site. Greenwich World Heritage Site Coordinator. 2006.

define the form of the city. They also help to shape people's sense of place, particularly as the views provide corridors that lead to or reveal important landmarks, townscape and landscape features. A positive approach to managing these views and landmarks over the long term is important, particularly given the increasing pressure to accommodate growth and new development within the Borough.

- 5.41. The London Plan identifies and protects Strategic Views which include significant buildings, urban landscapes and riverscapes that help to define London at a strategic level. There are two such strategic views traversing Lewisham. These are the 'London Panoramas' from Greenwich Park (General Wolfe's Statue) to Central London and Blackheath Point to Central London (the dome of St Paul's Cathedral). The London Plan sets the policy framework for managing these strategic views, with further guidance included in the Mayor's London View Management Framework Supplementary Planning Guidance, which proposals should refer as appropriate. It is imperative that these panoramic views of London, and the key landmarks within them, are not compromised. It is also important that development is managed so that the viewers can continue to experience and enjoy them.
- 5.42. There are also a number of important Local Views in Lewisham that warrant protection and positive management. In addition, a number of local landmarks have been identified because they add to the distinctive quality of the townscape and provide points of visual interest. These Local Views and Landmarks are listed in **Appendix X**.
- 5.43. Development proposals that are likely to affect London Strategic Views, Lewisham Local Views and Local Landmarks will be considered against the principles and policies for managing views, as set out in the **draft London Plan Policy HC4 (London View Management Framework)**. This includes consideration of impacts on the foreground, middle ground and background of the designated view and landmark features. In addition, proposals will be considered against the full suite of relevant Local Plan policies that seek to protect and enhance Lewisham's distinctive local character. Applicants are encouraged to refer the London View Management Framework SPG and the council's Local Plan evidence base, including Conservation Area Appraisals and the Lewisham Characterisation Study (2019).
- 5.44. Development should seek to enhance public access to viewing locations through public realm improvements. Opportunities should also be taken to create new local views and vistas. Proposals for major development, including where multiple sites are to be brought forward comprehensively, present particular opportunities to enhance views. Consideration should be given to the layout, orientation and height of buildings and spaces to enhance existing viewing corridors, or introduce new ones, to help reveal townscapes and landmarks. Proposals should also maximise the visual amenity provided by watercourses in the Borough.
- 5.45. The MHCLG Chief Planning Officer's letter (March 2017) placed a new requirement on Boroughs to consult the Mayor where buildings are proposed in an area which may affect a Protected Vista, and where they are beyond the areas

currently designated as Wider Consultation Area in the London View Management Framework SPG. Proposals sited in the background of a Protected Vista must pay attention to the impact of the development on the view so that it does not harm the setting of the Protected Vistas, whether the proposal falls inside the wider setting consultation area of a protected vista or not. The Mayor of London has produced a map for indicative purposes showing the extensions to the background of the Protected Vistas.

## MAP – STRATEGIC/LOCAL VIEWS & VISTAS

### QD 6 Optimising site capacity

- A. Development proposals must demonstrate that the design-led approach has been used to optimise a site's capacity. This will require that the optimum density of a site is achieved. To establish the optimum density consideration must be given to the appropriate development capacity of a site through the appraisal of design options, having regard to:
- a. The type and nature of uses proposed;
  - b. The site context, with reference to the site's immediate and surrounding area, taking into account:
    - i. Location setting;
    - ii. Local distinctiveness and urban character, including the prevailing and/or emerging form and proportion of development, with reference to [Policy QD1.D \(High Quality Design\)](#);
  - c. Public Transport Accessibility Levels, taking into account current levels and future levels expected to be achieved by the delivery of planned public transport infrastructure; and
  - d. Capacity of infrastructure (including physical, environmental and social infrastructure) to support the density proposed, having regard to the individual and cumulative impacts of development.

#### Explanation

- 5.46. As Lewisham continues to evolve in the context of London's growth it is imperative that development contributes to the delivery of high quality, inclusive, healthy, safe and liveable neighbourhoods. The key to achieving this will be to take a holistic and balanced approach to the way in which neighbourhoods function. This means ensuring that the limited supply of land is used effectively and efficiently, whilst also improving the physical and environmental quality of places that people inhabit and use. In order to meet the Borough's future needs and to support the delivery of the spatial strategy, it will be necessary to facilitate higher density development in appropriate locations, along with promoting a complementary mix of uses within Lewisham's neighbourhoods. This will help to secure equality of access for all to a wide range of housing options (including genuinely affordable housing), jobs and training opportunities, services and community facilities.
- 5.47. Through the design-led process, development proposals will be expected to demonstrate how they will deliver the optimum density on a site. The optimum density should not be taken as the maximum density. Rather, the optimum density

is one that is derived through careful consideration of the capacity of a site, taking into account the site's local context and character of the surrounding area, the types of uses proposed, accessibility to public transport and the infrastructure available to support the development. We will normally require evidence of an options appraisal, undertaken at the early stage of the design process, which has been used to inform the proposal and the approach to achieving the optimum density. This requirement may be applied flexibly on a case-by-case basis, taking into account the location, nature and scale of development. For instance, for householder and other smaller development schemes, a planning statement addressing the policy requirements may be sufficient. Applicants are advised to consult with the council's Planning Advice Service for further information on the requirements for specific sites and schemes.

- 5.48. The delivery of high quality development must begin with an understanding of a site in relation to its immediate and wider neighbourhood context. This includes consideration of the historical pattern of development, along with the existing and emerging urban character of the locality. Proposals are strongly encouraged to refer to the Lewisham Characterisation Study (2019) at the early stage in the design process. This study has informed the spatial strategy set out in this Local Plan and the character area policies in Part Three. It has also been prepared as a tool for the public and development industry stakeholders to engage with the planning process. Based on an objective assessment of character, it provides an indication of those areas within the Borough where new development should broadly focus on reinforcing the established urban form and fabric, as well as those areas that may be more receptive to gradual change or transformation. The Characterisation Study is a useful starting point for considering appropriate densities and will be particularly helpful with defining a site's broad local context, for example, whether urban or suburban, along with the distinctive urban grain within this context.
- 5.49. Character is a very important consideration in determining the optimum density of a site but it is not the only consideration. Development should also respond to public transport accessibility, amongst other factors. Our approach to delivering sustainable neighbourhoods requires that new development (including higher density development) is focussed within and around well-connected locations where people can benefit from access to different modes of travel, and will not have to rely on cars or other vehicles. Proposals will be expected to demonstrate how they have positively responded to accessibility, including by referring to the latest Public Transport Accessibility Level maps (published by Transport for London), and also assessing opportunities available for active travel, including those that could be delivered by the development itself. All development proposals will be considered on their individual site circumstances.
- 5.50. To help ensure that the optimum use of sites is realised, development proposals should address both the existing and future transport accessibility levels of a site and its surrounding area. Future accessibility should be considered in respect of planned improvements and committed investments to Lewisham's network of strategic transport infrastructure. The phasing of development will need to be carefully managed, especially where infrastructure is planned but not yet implemented. This will be a particularly important consideration in Lewisham's

Central and South Sub-areas, where the delivery of the Bakerloo line extension will drastically improve Public Transport Accessibility Levels over the long-term. Proposals will therefore be required to meet the requirements of Policies TR1 (Sustainable transport and movement) and TR2 (Bakerloo line extension), which set out further details in this regard.

- 5.51. The optimum density of a site should also be informed by the existing and planned infrastructure within the locality. This includes the different elements of physical, social and environmental infrastructure that are required for well-functioning and liveable neighbourhoods, and which users of the new development will be reliant on. The introduction of new development within an area, particularly higher density development, may put pressure on existing facilities and infrastructure or create additional demands. Development proposals should therefore plan positively for infrastructure needed to support the densities sought. Planning contributions may be used to ensure that new development is appropriately supported by infrastructure, including community infrastructure in line Policy CI (Safeguarding and securing community infrastructure).
- 5.52. Finally, the optimum density of a site should be determined with reference to the nature and mix of uses proposed. For residential development, proposals will generally be supported where density levels are appropriate to the local context and they deliver high quality housing to meet local needs, particularly genuinely affordable housing. For commercial and industrial uses it is important that development helps to support our strategic objectives for intensifying uses on employment sites, particularly to deliver more jobs and new workspace. Proposals incorporating employment uses should therefore be designed with reference to Policy E3 (Location and design of new workspace) and EC13 (Optimising the use of town centre land and floorspace).
- 5.53. To assist with the design-led process and to facilitate development that meets the Borough's growth requirements, we will in the future prepare Supplementary Planning Documents focussed on specific locations and site typologies. This includes guidance addressing the strategic A21 Corridor and Lewisham's suburban areas. All development proposals will be expected to refer this guidance to achieve the optimum density on sites and to support delivery of sustainable neighbourhoods.

## QD 7 Amenity and agent of change

- A. Development proposals must demonstrate how they will protect and wherever possible enhance the amenity of existing and future occupiers and uses, as well as the amenity of neighbouring properties and uses.
- B. Development proposals will be required to positively address amenity through the design-led process in order to:
- Make appropriate provision of privacy both for users of the development and those in neighbouring properties, ensuring development does not result in unreasonable levels of overlooking;

- b. Ensure adequate provision for and seek to optimise outlook for users of the development;
  - c. Ensure adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; and
  - d. Minimise and appropriately mitigate disturbances associated with the construction and operation of the development including noise, vibration, odour, fumes, dust, artificial light and site waste.
- C. When considering the amenity impacts of new development the Agent of Change principle will be applied in accordance with the [draft London Plan](#).

### **Explanation**

- 5.54. It is important that development contributes to the delivery of high quality environments that people can enjoy without disturbance and live healthily in. Lewisham is an inner-London Borough with a sizeable resident and visitor population. It also accommodates a wide range of activities and land uses including for housing, industry and employment, transport and open space. In this urbanised setting, it is imperative that development is designed in a way that does not adversely impact on the amenity of people in the Borough at any given time, or on the ability of different uses to continue operating (where they are appropriately located). This is especially for economic, community and cultural uses that positively contribute to the vitality of neighbourhoods.
- 5.55. We will expect that all new development protects and wherever possible enhances local amenity. Amenity should be central to the design-led process, with careful consideration given to the layout, design, construction and operation of buildings and spaces, including the public realm. Proposals must provide a sufficient level of information to demonstrate that potential impacts have been identified and avoided or appropriately mitigated. We will resist proposals that are likely to cause unreasonable harm to the amenity of users of the development or occupants and uses in neighbouring properties.
- 5.56. Local amenity can be compromised or adversely impacted in a number of ways. Some examples include: the loss of daylight and sunlight to existing properties owing to extensions or new structures; excessive or obtrusive light; odour from restaurants and other commercial activities; vibration and pollution from industrial uses, railways, and roads; noise from cultural or entertainment facilities; and loss of privacy and diminution of outlook due to insensitively sited and designed development. All proposals for new buildings and uses should assess and proactively respond to local amenity having regard to site-specific circumstances. Compatibility of use should be a key consideration during the initial site selection process.
- 5.57. Development proposals must appropriately respond to the immediate setting and wider neighbourhood context. For new housing or other development near residential properties, proposals must ensure provision of adequate daylight, sunlight and outlook. Privacy is another key consideration and new development should not cause significant or unreasonable harm in terms of overshadowing or

overlooking. Proposals will be expected to take account of existing and proposed future uses, for example, by considering land use principles established by existing planning consents or strategic site allocations.

- 5.58. The **draft** London Plan introduces the 'Agent of Change' principle. This places the responsibility for mitigating the impact of noise on new development. In practice this means that where new developments are proposed close to existing noise generating uses, they must be designed more sensitively to protect the new occupiers from noise impacts. As well, where new noise generating uses are proposed close to noise sensitive uses the responsibility will be on the new use to protect the existing residents or uses from noise. We will apply the Agent of Change principle in accordance with the criteria set out in **draft London Plan Policy D12 (Agent of Change)**.
- 5.59. Noise generating cultural venues such as theatres, concert halls, pubs and live music venues should be protected for the benefit of the wider community and the local economy. Development proposals for schemes in the vicinity of these types of facilities must be designed in ways that ensure established cultural and other venues remain viable, can operate without the threat of closure due to noise complaints and can continue to operate as they are without licensing restrictions. This is particularly important in Lewisham's Creative Enterprise Zone, where a critical mass of cultural venues and community facilities is necessary to support strategic objectives for this element of the local economy.
- 5.60. Noise sensitive development such as housing, hospitals, day centres and schools proposed close to noise-generating uses must include acoustic design measures that are developed within the scheme from an early stage. Even greater care must be taken where it would have a disproportionate effect on more vulnerable people such as the elderly or young children. Measures that could be employed to overcome impacts could include soundproofing or insulation. The Mayor's London Environment Strategy provides further guidance on managing and mitigating noise in mixed-use development and town centre development.
- 5.61. We will seek to protect open spaces as tranquil havens with positive soundscapes where people can interact with the natural acoustic environment, including natural sounds, animal vocalisation, weather, water and river flows. Development should recognise and positively respond to the value of tranquil and quiet areas. Opportunities should be taken to protect and enhance these environments for the benefit of the local community and biodiversity.

## **QD 8 Noise and vibration**

- A. Development proposals should be designed to avoid or minimise the harmful impacts of noise and vibration at all stages of the development, having regard to the Agent of Change principle.
- B. New noise and vibration generating development must be appropriately located away from noise sensitive uses and suitably demonstrate that measures will be implemented to mitigate any adverse impacts.

- C. New noise sensitive development should be located away from existing or planned sources of noise pollution. Where this is not reasonably practical proposals must demonstrate that:
- a. Internal and external noise levels can be satisfactorily controlled and managed; and
  - b. There will be no adverse impact on the continued operation and amenity of adjoining and neighbouring uses, having regard to [Policy QD7 \(Amenity and agent of change\)](#).
- D. A Noise Assessment and/or Vibration Assessment will be required to be submitted with proposals where they are noise sensitive developments or involve a noise or vibration generating use.

### **Explanation**

- 5.62. It is important for the mental health and wellbeing of Lewisham's resident and visitor population that noise is managed to acceptable levels. There are a wide range of land uses and activities within the Borough, including significant noise generating uses (such as industrial activities) or buildings that are sensitive to noise by virtue of their users or environment (such as schools, health facilities and housing). This policy seeks to ensure that new development provides for the protection of amenity where there is an interaction between noise generating or noise sensitive uses.
- 5.63. New development should be designed to avoid or minimise disturbance from noise pollution and vibration, including by appropriately mitigating impacts on site users and adjacent land uses. We will seek to ensure that noise is managed to acceptable levels having regard to the relative ambient noise levels and the character of the locality. All proposals should consider noise and vibration in the site selection process and, where necessary, address mitigation measures from the early stages of the design-led process.
- 5.64. New noise sensitive development (such as housing and community infrastructure) should be located away or appropriately separated from existing or planned sources of noise pollution. This is especially important where noise could have a disproportionate effect on vulnerable groups such as children, young people or the elderly. Appropriate mitigation measures in the design, internal layout and treatment of the building and façade will be required. This includes adequate sound insulation to minimise the adverse impacts of noise, such as from railways, roads or commercial activities. Consideration should also be given to the provision of natural or mechanical ventilation where, for acoustic reasons, an alternative to opening windows is required.
- 5.65. Proposals will be expected to submit a Noise and/or Vibration Assessment where sites are located in high-noise areas or where a new development is likely to generate significant noise. This will enable the consideration of how the existing noise environment affects any proposed noise sensitive development and the potential impact that new noise generating development will have on the local area.

- 5.66. The council's Good Practice Guide: Control of Pollution and Noise from Demolition and Construction Sites has been prepared to assist developers and their contractors in ensuring that they carry out their works in the most considerate manner in order to reduce the environmental impact and disturbance arising from their works. Transport for London also provides standing guidance on the Construction Logistic Plan required for major developments and the assessment of traffic movements, which applicants are encouraged to refer.

## QD 9 External lighting

- A. Development proposals incorporating external lighting will be supported where they protect and wherever possible enhance local character, amenity and natural habitats.
- B. Development proposals must be designed to avoid adverse impacts of light pollution at all stages of the development, or make provision for appropriate mitigation measures. Proposals will be required to demonstrate that external lighting is:
- Appropriate for its purpose in its setting;
  - Designed and operated to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as residential properties and natural habitats; and
  - Energy efficient.
- C. Where a development proposal includes an element of public realm, it should contribute to creating a safe and attractive environment through the provision of sensitively integrated external lighting, where appropriate, having regard to (A) and (B) above.

### Explanation

- 5.67. Artificial external lighting can play an important role in supporting safe, accessible and liveable neighbourhoods. For example, it can help to ensure a safe and legible environment for movement within the Borough, including by walking and cycling. It can also extend opportunities for leisure, sport and recreation by enabling evening and night-time use of facilities and the public realm. In addition, external lighting can contribute to local character and place-making by enhancing the visual appearance of buildings and townscapes.
- 5.68. If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues. There are three main types of light pollution: sky glow (the brightening of the night sky), glare (the uncomfortable brightness of a light source when viewed against a darker background) and light intrusion or trespass (the spilling of light beyond the boundary of the property or area being lit). All such pollution results in excessive or obtrusive light that may cause nuisance to the population, adversely impact on the amenity of properties and harm habitats and biodiversity. External lighting can also result in unnecessary and inefficient energy use. We will therefore seek to ensure that development proposals make appropriate provision for the design and use of external lighting.

- 5.69. Details of lighting schemes should be in line with the latest industry guidance published by the Institute of Lighting Professionals. Proposals should take into account that Lewisham, on the whole, falls within Zone 3 Medium District Brightness Areas. However this will need to be established on a case-by-case basis as there are variations in localities, for example, in Lewisham Town Centre where Zone 4 may apply. Residential development proposals should seek to achieve the 2-LUX standard.
- 5.70. Development should provide sensitively integrated lighting within the public realm to contribute to safe environments. This includes footpaths, cycleways and public opens spaces and parking areas. However, proposals will need to ensure that an appropriate balance is struck with managing safety requirements and the potential adverse effect of lighting on amenity and biodiversity, including water habitats. Lighting from new buildings will must be designed and positioned in a way that minimises floodlighting. Where public areas need to be lit close to green and water spaces, careful positioning of light sources will be required, with the beam directed away from sensitive areas such as trees and rivers. The use of time or movement sensitive lighting is encouraged to support benefits to biodiversity and energy conservation.
- 5.71. This policy is separate from statutory artificial lighting nuisance controls relevant to the Clean Neighbourhoods and Environment Act 2005 and Environmental Protection Act 1990.

## QD 10 Building alterations, extensions and basement development

### Key principles

- A. Development proposals for building alterations and extensions must deliver high quality designs and positively respond to local character, taking into account the Alterations and Extensions Supplementary Planning Document (2019).
- B. All development proposals for building alterations and extensions must positively respond to the site's context, character and distinctiveness. The design-led process should be used to ensure that development is sensitively integrated into the site and its wider setting. Proposals will only be supported where they:
  - a. Respect and complement the form, proportion, setting, period, architectural characteristics and detailing of the original building;
  - b. Use high quality, durable and matching or complementary materials;
  - c. Maintain and wherever possible enhance, and do not adversely impact on, the architectural integrity of a group of buildings as a whole, or cause an incongruous element in terms of the important features of an area's character; and
  - d. Do not adversely impact on, or result in the loss of, the amenity of neighbouring properties, including back gardens, in line with other Local Plan policies.

- C. Innovative and contemporary designs for building alterations and extensions will be supported where they positively respond to the local context, having particular regard to (B) above, and are of an exceptional design quality. Where proposals seek to integrate a modern design aesthetic and materials, careful consideration will be required to ensure that the distinctive character and features of the original building are respected and not harmed.
- D. New units or rooms created by a residential alteration or extension must ensure adequate amenity and space for building occupiers.

#### Side, rear and roof extensions

- E. Side extensions should normally be set back and down from the main building line to allow for a clear break between existing buildings and the new development, and to maintain architectural subordination to the original building.
- F. Rear extensions will be resisted where any part of the extension projects higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope.
- G. Where roof extensions are proposed, priority should be given to placement at the rear of the building. Roof extensions at the front of a building, particularly on the street frontage of a residential street or predominantly residential area, must be justified in design terms, and supported by an options appraisal to demonstrate that a rear extension is not feasible.
- H. Residential extensions to properties with existing private gardens should retain an accessible and usable private garden that is appropriate in relation to the size of the property, and normally retain at least 50 per cent of the garden area.
- I. Where the roofline or party walls of buildings or terraces are exposed to longer views from public spaces, proposals for roof extensions should seek to maintain these views and the viewing corridor. Proposals will be resisted where they would result in an obtrusive or adverse impact on such views.

#### Detailing

- J. Roof lights on the front roof slope of buildings should be considered in relation to the design of the dwelling and harmonise with the street scene.
- K. Additional or enlarged windows, doors and other openings should be in keeping with the original design and pattern, and in the case of a roof extension, should reflect the existing alignment of the windows. Replacement windows should closely match the pattern of the original windows. The repair of original windows is strongly encouraged.
- L. Details of plant, pipework, fire escapes, lifts and other mechanical equipment (including ducts and flues) should be included within the designs submitted with the

initial planning application. All such design features, infrastructure and equipment should be enclosed within the envelope of the building or, where this is demonstrably not practical, sited where they will have the least visual impact.

#### Basement development

- M. Proposals for basement development must be accompanied by a Basement Impact Assessment and will only be permitted where it can be suitably demonstrated that the development:
- a. Is sensitively integrated into the site, proportionate to host building (including the original building in the case of a basement extension) and avoids harm to local and historical character;
  - b. Will not adversely impact on the structural stability of the host building, neighbouring properties, infrastructure and the public realm, taking into account local geology;
  - c. Will not result an increase to flood risk, having regard particular regard to [Policy SD7 \(Reducing flood risk\)](#);
  - d. Will not adversely impact on the natural environment; and
  - e. Will not adversely impact on the amenity of neighbouring properties on occupation and use, and will minimise impacts on amenity during the construction phase.
- N. Where a residential basement development extends beneath the garden area, proposals must demonstrate that:
- a. There will be no loss of or harm to trees of value, including amenity and townscape value, in line with [Policy GR4 \(Urban greening and trees\)](#); and
  - b. The development will maintain adequate soil depth satisfactory for landscaping, taking into account impacts on and requirements of neighbouring properties.
- O. Development proposals for basements including habitable rooms for residential use, or other sensitive uses, must ensure safe access and egress for all likely users of the development. Proposals will be refused where they do not suitably demonstrate that all likely users of the development will be safe from all sources of flooding.

#### Light wells

- P. Development proposals for light wells will only be supported where they respect the architectural and historical character of the host building and its wider setting, and do not adversely impact on the amenity of neighbouring properties. Light wells should be sensitively integrated into the site and designed to avoid the loss of amenity space, including garden land. Proposals that would result in an excessive or harmful loss of amenity space will be resisted.

### **Explanation**

Alterations and extensions

- 5.72. We want to ensure that the highest design quality is achieved through all new development, including extensions and alterations. This is particularly where alterations or extensions are proposed to existing homes or within established residential areas, including Conservation Areas and Areas of Special Character. In response to the strong local interest from householders and other members of the public with respect to this type of development, we have prepared an Alterations and Extensions SPD (2019). This guidance document sets out clear principles and development guidelines that help to support implementation of the Local Plan. All proposals will be expected to refer to the SPD, as appropriate.
- 5.73. The Lewisham Characterisation Study (2019) discusses how the urban grain and local character of neighbourhoods varies greatly throughout the Borough, with remnants of historic development surviving to the modern day. Development proposals need to be well thought out, using the design-led process to ensure a fundamentally site specific response to the urban grain. This will help to ensure alterations and extensions are sensitive to their local and historical context, and do not adversely impact on the amenity of neighbouring properties.
- 5.74. Extensions to residential buildings should normally be subordinate in scale to the original building. This is in order to ensure that new development does not dominate existing and well-established features of the building or setting, or result in disproportionate additions that detract from local character. Alterations and extensions must also respect the architectural qualities and coherence of the urban grain, for example, by taking into account the distinctive qualities of blocks or terraces of buildings and not undermining their established uniformity.
- 5.75. Innovative, high quality and creative contemporary design solutions that positively respond to the site context will be supported in principle, so long as the design carefully considers the architectural language and integrity of the original building and avoids any awkward jarring building forms.

#### Basement development

- 5.76. Basement developments are becoming an increasingly popular way for householders to adapt their homes to changing lifestyles and needs, for example, to create more amenity space or accommodate larger families. They also offer opportunities for businesses and organisations to make a more optimal use of land and space in a highly urbanised area like Lewisham, for instance, by accommodating additional workspace or operational space. Whilst recognising the role that basements can play in meeting the needs of the local population, it is important that development does not adversely impact on local character and the environment or harm the amenity of neighbouring properties, whether during the construction or occupation phases.
- 5.77. Not all new basements will require planning consent as there are permitted development rights covering some types of development. Where planning permission is required, we will consider proposals against the Local Plan policies to ensure new basement developments are appropriately integrated into the site and local area. Particular consideration will need to be given to impacts on

structural stability of the host building and adjoining properties, as well as to any environmental impacts that are likely to arise from the development, including during its construction phases. These matters should be addressed through the Basement Impact Assessment (BIA), which we will require to be submitted at the application stage. The BIA must be carried out by a suitably qualified and recognised independent assessor and paid for by the applicant. Basement development proposals will be strongly resisted where it cannot be demonstrated that harmful impacts can be avoided or appropriately mitigated.

- 5.78. Applicants will also be expected to ensure that harmful impacts on amenity are minimised as much as reasonably practical during the construction phase of development. Details should be provided of measures to address local amenity at all phases of development. Depending on the nature and scale of proposals, construction management plans may be secured by condition or legal agreement.

#### Light wells

- 5.79. Light wells can help to enhance the amenity of a building's users and occupiers. However the introduction of light wells can harm local character, including historical character, particularly where they are poorly designed or not in keeping with the established features of a street or neighbourhood. All proposals for light wells must be designed to a high quality standard, with careful consideration given to their integration within the site along with their relationship to the host building and wider setting. Additionally, proposals will be expected to demonstrate that there will be no adverse impact on amenity, particularly in terms of light pollution which is a concern with development of this type. Light wells should not result in an excessive or harmful impact on amenity space, including garden land. We will seek to resist proposals that would result in a significant loss of amenity space, taking into account the nature of the proposal along with the amount and quality of amenity space on site.

## QD 11 Infill and backland sites, garden land and amenity areas

### Key principles

- A. Development on infill and backland sites, garden land (including back gardens) and amenity areas will only be acceptable where:
- The use is appropriate to the site and compatible with land uses in site's immediate vicinity and surrounding area;
  - The development has a clear urban design rationale.
- B. Where development on infill and backland sites, garden land and amenity areas is acceptable in-principle, having regard to (A) above, proposals must:
- Be designed to a high quality standard and positively respond to the site context and local character, including historical character;

- b. Be sensitively integrated into the site, including by responding to the sizes and proportions of adjoining and neighbouring buildings, as well as the spaces between buildings;
  - c. Retain trees and integrate high quality landscaping, in line with [Policy GR3 \(Urban Greening and Trees\)](#);
  - d. Ensure appropriate arrangements for safe access and servicing, including by retaining and enhancing existing pedestrian access and through routes wherever possible; and
  - e. Do not result in harmful overshadowing or overlooking, or otherwise adversely impact on the amenity of neighbouring properties, including their rear gardens, or the occupiers of the development, having regard to other Local Plan policies.
- C. Proposals for housing development must meet the amenity and space requirements set out in the Local Plan, also taking into account relevant guidance, including the London Mayor's Housing Supplementary Planning Guidance.

#### Infill sites

- D. Development proposals within street frontages and on street corners will only be supported where they:
- a. Make a positive contribution to local character, including historical character; particularly by responding to the distinctive qualities of the street and street frontage;
  - b. Maximise opportunities to repair harmful breaks or the appearance of buildings which detract from the character of the street frontage;
  - c. Are sensitively integrated into the street frontage, including by respecting the proportions and spaces of and between existing buildings; and
  - d. Retain appropriate garden space for adjacent residential properties.

#### Backland sites

- E. Development proposals on backland sites will only be supported where they:
- a. Provide accessible, safe and convenient access for all intended users of the development;
  - b. Do not introduce gates or other design features that restrict or prevent public access to or through the site.

#### Garden land (including back gardens)

- F. Garden land makes an important contribution to the character and amenity of Lewisham's neighbourhoods, and often has biodiversity value. The use of garden land for new development should therefore be avoided.
- G. Proposals that would result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing. The loss of garden land will normally only be considered acceptable in exceptional circumstances where:

- a. The proposal is for comprehensive redevelopment of a number of whole land plots; and
- b. The requirements of (A) above are satisfied.

#### Amenity areas

- H. Development proposals on amenity areas of landscaped open space attached to existing residential buildings will only be supported where they:
- a. Repair, reinstate or re-provide active street frontages;
  - b. Retain existing private garden space; and
  - c. Support inclusive and safe design, particularly by enhancing natural surveillance.

#### Explanation

- 5.80. To deliver the spatial strategy for the Borough we will seek to direct new development to key locations (such as Opportunity Areas and town centres) and also ensure new development optimises the use of land within these locations. However, there may also be opportunities to make a more beneficial use of land through the redevelopment of smaller sites, such as backland and infill sites, as well as garden land and amenity spaces. This is particularly where new and sensitively integrated development helps to enhance local character, such as by repairing harmful breaks in street frontages or activating vacant backland sites, and provides new housing to meet local needs, as supported by policy HO2 (Optimising the use of small housing sites).
- 5.81. To help ensure that new development is designed to a high quality standard and positively responds to local character, this policy addresses different types of site opportunities, as set out below.
- Infill sites: sites within street frontages (such as former builders' yards, small workshops and garages, gaps in terraces and gardens to the side of houses).
  - Backland sites: 'landlocked' sites to the rear of street frontages and not historically in garden use (such as builders' yards, small workshops and warehouses, and garages), often in close close proximity to existing housing.
  - Garden land (including back gardens): private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed. Garden land is not defined as Previously Developed Land, as set out in the NPPF.
  - Amenity areas: communal amenity areas attached to or associated with residential development. Examples of these are: private communal gardens for small blocks of flats landscaped spaces around taller blocks of flats and around low and medium rise 'slab blocks', where typically the distinction

between the public and private realms is ambiguous and which provide a generally less secure environment as a result.

- 5.82. These site typologies cover the majority of sites that will require consideration under this policy. However, it is recognised that there may be some instances where a particular site will not fall squarely within any one of these categories. In these cases the principles that will be applied for planning decisions will be taken from the appropriate parts of this policy.
- 5.83. Not all infill, backland, garden land and amenity area sites will be considered appropriate for new development, or for certain types of land uses. All proposals will be considered on a case-by-case basis, taking into account the nature and scale of the proposed use, along with the site context and character. All planning applications will be required to demonstrate that the development site is appropriate for the proposed use, and that there is a clear urban design rationale for bringing forward development at this location.
- 5.84. We will resist proposals that do not suitably demonstrate that development will make a positive contribution to local character and protect the amenity of neighbouring properties.

#### Infill and backland development

- 5.85. All proposals for infill and backland development must be informed by the design-led approach. This will help to ensure that new development positively responds to the local context and is sensitively integrated into the locality, taking into account the visual and functional qualities of the site and its surrounds. Careful consideration will need to be given to the distinctive character and features of the site and its wider setting. This includes the streetscape and architectural detailing, along with the proportions and orientation of buildings, including the spaces between them. Development on mid-terrace sites will require particular attention to ensure they complement the character of the street and provide a positive frontage. Infill development provides particular opportunities to repair harmful breaks in the street frontage.
- 5.86. Access and servicing requirements of backland sites will be an important factor when considering development proposals. Development must be designed to ensure adequate arrangements for all vehicles likely to require access to the site, including for emergency services, refuse and recycling collection and deliveries. Proposals must also ensure safe and convenient pedestrian access to the site and buildings.
- 5.87. Development proposals on infill and backland sites should ensure that existing pedestrian connections, whether formal or informal, are retained in order to ensure permeability with the rest of the neighbourhood. Gated developments are considered to be less secure due to the reduction of natural surveillance, and also adversely impact on site permeability and integration. It is also important that development does not result in a loss of security to adjacent dwellings.

- 5.88. Where new housing development is proposed, this should ensure compliance with other relevant Local Plan policies, having particular regard to [Policy HO5 \(High quality housing design\)](#). Provision of accessible, secure, private and usable external space, include space children's play space, will be required where appropriate. Garden space must not be provided in a piecemeal fashion in a series of small garden areas, but as a usable space suitable for the intended occupants.

Garden land (including back gardens)

- 5.89. Garden land, including back gardens, make an important contribution to local character and amenity and often have ecological value. Development on garden land should therefore be avoided in favour of development opportunities elsewhere in the Borough, particularly on brownfield sites and previously developed land, consistent with the spatial strategy for the Borough. The NPPF is clear that garden land is not considered Previously Developed Land.
- 5.90. The Lewisham Characterisation Study (2019) examines the different features of the Borough's built and natural environment. It identifies various urban typologies where the built form relies on more or less regular street forms, building facades, and garden areas. The study helps to provide an indication of where new development on garden land, including back gardens, is are likely to have an adverse impact on the urban grain and local character. Applicants are strongly advised to refer the Characterisation Study when considering development proposals.
- 5.91. Back gardens in perimeter block urban typologies, which have more or less enclosed rear gardens, are considered to be an integral part of the original design of these types of residential areas, provide valuable amenity space and an ecological resource. We will therefore seek to resist proposals for development on garden land in these locations. Other typologies also often have dwellings with private back gardens that do not form such a strong design feature of the development. These are typically associated with more modern development, featuring small gardens that are rarely longer than 10 metres or are quite narrow, and are therefore not considered suitable for development.
- 5.92. Proposals that would result in the loss of garden land, including private back gardens, will be strongly resisted. This includes the development of back gardens for separate dwellings in perimeter forms of housing. The loss of garden land will normally only be considered acceptable in exceptional circumstances, where sites can be assembled to bring forward comprehensive redevelopment, in accordance with other Local Plan policies, and where appropriate re-provision of garden land is provided to mitigate losses as much as possible. For all such proposals, development must be designed to provide an appropriate layout and built form that complements local character and protects amenity of neighbouring properties.

## QD 12 Shopfronts

- A. Shopfronts (including their signs, canopies and security installations) must be designed to high quality standard. They should positively respond to and enhance the character of Lewisham's neighbourhoods and contribute to the creation of lively and safe environments.
- B. Development proposals for new shopfronts or alterations to existing shopfronts will be required to:
  - a. Retain, refurbish or reinstate shopfronts, or associated elements of architectural interest, particularly where these positively contribute to the distinctive visual or historic character of a building, townscape or area;
  - b. Be of a proportion, scale and quality that positively responds to the character of the host building and, where relevant, adjoining properties;
  - c. Use high quality materials and colours that are sensitive to local character;
  - d. Retain or provide glazed shop windows; and
  - e. Ensure inclusive and safe design.
- C. Development proposals for shopfront signage will only be supported where they contribute to a high quality townscape and do not adversely impact on local character, amenity and public safety. Within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they successfully relate to the design and detailing of buildings and positively contribute to the distinctive character of a group of buildings or street.
- D. Development proposals for open shopfronts without a stall riser and glazed screen will be resisted.
- E. Development proposals for shopfront canopies that are fixed in the 'down' position will be resisted. Retractable canopies may be acceptable where they are appropriately designed to provide sufficient clearance and positively respond to local character.
- F. Shopfront security features, including roller grilles and shutters, must not be visually intrusive, create blank frontages or detract from the character of the townscape. Where such installations are considered necessary development proposals should seek to use internally located, open mesh security shutters and boxes.
- G. Where proposals require a new shopfront as part of a mixed-use scheme, including re-provision of an existing unit, development will be expected to make provision for shopfront fit out.
- H. Development proposals should retain, and wherever possible enhance, street level doors and entrances that provide access to upper floor residential uses.

### Explanation

- 5.93. Lewisham's high streets and shopping areas are an important part of the neighbourhoods in which they are located. They contribute to creating a sense of place and often reflect the unique character and historical development of the Borough, as set out in the Lewisham Characterisation Study (2019) and Lewisham's Conservation Area Appraisals. Well-designed shopfronts, including those of architectural or historic interest, make an important contribution to local distinctiveness and the quality of the urban environment.
- 5.94. Development proposals should seek to ensure that shopfronts of good architectural quality or those with historic value are retained, refurbished or reinstated wherever possible. Where retention is not possible, replacements should use high quality materials and incorporate designs which are appropriate to the period and character of the building. Particular consideration should be given to shopfront framework features including pilasters, brackets, fascias and projecting signs. This is especially important where development of a shopfront would impact on the significance of a heritage asset or its setting. High quality designs will be needed for shops located within a Conservation Area or shopfronts that comprise part of a Listed Building. Applicants are advised to refer the council's Conservation Area Appraisals for further information. Applicants are encouraged to refer the council's latest Shopfront Design Guide Supplementary Planning Document for further information.
- 5.95. New shopfronts should be designed to a high quality standard, using materials and treatments that are sensitive to the character of the host building and neighbourhood. The standardisation in much of current shop design can gradually devalue the character and individual qualities of buildings in shopping areas. It is important that the design and materials of new and replaced shopfronts relate well to the scale of the building and its surrounds, as well as the original features of the building where these contribute positively to local character.
- 5.96. The design and quality of shopfronts can be maintained by referring to the architecture of the host building and high quality shopfronts in comparable neighbouring units, and by reflecting the general scale and pattern of shopfronts in the area. New shopfronts should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character and attractiveness of the centre or parade it is located in. The detailing, quality of materials, execution and finishes are very important in shopfront design, particularly as they are viewed close-up.
- 5.97. Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all. If a shopfront is replaced or altered, the design should respect the characteristics of the host building and, where appropriate, shopfront windows and framework features should be retained or restored.
- 5.98. Shopfronts with bulky and crudely attached, fully internal illuminated box fascias and intrusive signage add to visual clutter and detract from the quality and character of the townscape. Whilst recognising internally illuminated box fascia

signs may be acceptable in some locations, their use should be avoided in residential areas where amenity can be adversely impacted, as well as locations that would result in harm to the street scene or significance of a heritage asset or its setting.

- 5.99. Shopfront security features should not have a detrimental impact on the townscape and local character. The use of solid external security shutters and grilles can create an unpleasant atmosphere when premises are closed, perpetuating fears to personal safety. The use of open mesh security shutters and boxes is encouraged, where such interventions are considered necessary. Security features should be designed so that they can be hidden behind the fascia in order to reduce visual clutter from the frontage and townscape.
- 5.100. Where mixed-use schemes involve creation of a new shopfront, development proposals will be required to provide a reasonable shopfront fit out, having regard to viability. This is particularly important to encourage the occupation of business units and reduce the likelihood of vacancy, which can adversely impact on town centre vitality. We will therefore seek an appropriate level of shopfront design detail at the initial application stage, and to ensure high quality design sensitive to the surrounding context.

### QD 13 Outdoor advertisements, digital displays and hoardings

- A. Outdoor advertisements, digital displays and hoardings should contribute to attractive and safe environments. Development proposals for these types of installations will be supported where they are designed to a high quality standard, appropriately sited, and adequately maintained throughout their operation to ensure:
- a. There is no adverse impact on local character, appearance or visual amenity on the site or surrounding area;
  - b. Heritage assets and their setting are preserved or enhanced;
  - c. They do not result in the unsightly proliferation or dominance of signage and displays in the vicinity of the site;
  - d. There is no harm to public amenity, including by way of excessive illumination and visual intrusion of light pollution into adjoining or neighbouring properties and public spaces;
  - e. There is no adverse impact on public or highway safety; and
  - f. There is no harmful impact on trees, especially those with Tree Protection Orders (TPOs).

#### Explanation

- 5.101. Outdoor advertisements, digital displays and hoardings are a means of providing information to the public and can play a complementary role in supporting the economy. However the physical quality of places, including streetscapes and townscapes, can be compromised by displays that are poorly sited, designed and maintained. Displays can also have a harmful impact on local amenity, particularly where they are excessively bright and project light pollution onto neighbouring properties. As with all other types of development, we will seek to ensure that

these sorts of installations positively respond to local character as well as contribute to safe and attractive environments.

- 5.102. Advertisements, digital displays and hoardings are regularly located on or adjacent to the public realm. Particular care is needed to ensure uninhibited movement along the public realm by all users, including people with disabilities. It is also important that highway safety is maintained and development does not pose a risk to road users. Proposals for advertisements on or adjacent to the Transport for London Road Network will be required to consult Transport for London for an opinion on the impact on the safe operation of the highway network.
- 5.103. Where poorly designed and sited, outdoor advertisements, digital displays and large hoardings can have an adverse impact on local amenity and the quality of the public realm. For example, they can obscure the views of occupants inside buildings, obscure elevations which contribute to the appearance of the public realm, or cause visual harm to parts of windows, cornices and other significant architectural features. Careful consideration must therefore be given to impacts on the host building or structure, as well as the site and its local context.
- 5.104. Where hoardings are to be installed, they must be incorporated in a way that is sensitive to the local area. Proposals should maximise opportunities for hoardings to add visual interest while they are in place, such as by incorporating public art.
- 5.105. Applications for advertisements and hoardings are required to follow the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

## 6 Heritage

### HE 1 Lewisham's historic environment

- A. The council will seek to preserve or enhance the value and significance of Lewisham's historic environment and its setting by:
- a. Collaborating with stakeholders to identify, assess, monitor and review heritage assets and understand their importance to both the Borough and the nation;
  - b. Celebrating Lewisham's historic environment and ensuring that it is central to reinforcing sense of place and place making;
  - c. Ensuring the significance of the Borough's heritage assets is fully understood, positively valued and that their contribution to sustainable communities is recognised, including by preparing a Heritage Strategy;
  - d. Requiring that heritage meaningfully informs the design of development proposals, and supporting development that preserves or enhances the significance of heritage assets and their setting;
  - e. Promoting heritage-led regeneration and urban renewal where this ensures that new development retains, reveals or reinstates significant aspects of the Borough's historic environment;
  - f. Requiring development proposals to demonstrate that all reasonable measures have been investigated to avoid harm to heritage assets; and
  - g. Using planning powers available to appropriately manage new development in sensitive places and to remedy harmful unauthorised works.
- B. All proposals in the historic environment should assess whether the site, building or structure is - or could be - identified as a heritage asset. The council will consider the significance of the asset and the impact of the proposals on its special interest. Any harm should be clearly and convincingly justified, and will be weighed against the public benefit of the proposal.
- C. Proposals for works that could impact on a heritage asset are required to be accompanied by a Heritage Statement. This should be compiled with reference to relevant and available sources of historic environment information and:
- a. Explain the significance of the asset and its setting;
  - b. Set out how the asset has informed the design of the proposal; and
  - c. Assess the impact of the proposal on the asset.

#### **Explanation**

- 6.1. Lewisham has an extremely rich and varied historic environment. It encompasses landscapes, water bodies, parks and open spaces, buildings, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of Lewisham, its communities and people. This is reflected in the physical fabric of places, the values that people ascribe to them and the traditions and memories

associated with them. Their value may be historic, architectural or artistic, social and communal.

- 6.2. We are committed to ensuring that the full extent of the significance of heritage assets is understood, both by development industry stakeholders and the wider public, and to properly recognise and protect this significance. This is vital to the successful delivery of the spatial strategy for the Borough. As Lewisham's places evolve over time it is imperative that our irreplaceable heritage assets are appropriately preserved and the distinctive characteristics that make them special are retained and revealed.
- 6.3. In planning policy terms the Borough's heritage assets comprise of statutorily designated assets and non-designated assets, both of which make important contributions to the communities within which they are situated. We have a key interest in ensuring that these assets are preserved or enhanced over the long-term. As well as recognising the value of these assets in their own right, their conservation will support the vitality and local distinctiveness of places across the Borough, and to help instil and reinforce a sense of place amongst residents and visitors.
- 6.4. Conservation is an active and continual process of maintenance and managing change based on a thorough understanding of what is special about a place. It requires a multi-agency approach to deliver beneficial outcomes. Our expectation is that community and special interest groups, key stakeholders and the development industry will all positively engage in the conservation process. Collaboration is necessary to deliver our growth and regeneration objectives whilst also ensuring Lewisham's historic environment can continue to be celebrated and enjoyed, both by current and future generations.
- 6.5. All development proposals should be based on a full understanding of the significance of heritage assets within the site and surrounding area. This should be established by reference to relevant and available sources of historic environment information. This includes the Greater London Historic Environment Record, the council's planning and conservation webpages and Lewisham's Local History Archives. Applicants should consult good practice guidance to assist in assessing various levels of significance, such as that produced by Historic England. We will expect all development proposals to identify and positively respond to those elements that are of high, moderate and low historic significance and those elements that detract from the significance.
- 6.6. All development proposals that are likely to have an impact on a heritage asset or its setting must be accompanied by a Heritage Statement. The statement should clearly explain the significance of the asset and its setting, set out how this has guided the design of the proposal, and assess how the proposal impacts upon it. Applicants will be expected to demonstrate how these findings have meaningfully informed the design of the proposal.

- 6.7. Not all heritage assets are currently known, documented or fully understood. Buildings, structures or sites may be identified as non-designated heritage assets through the development process. For example, new information may be revealed by local groups through the consultation process or during preliminary site investigations undertaken by an applicant. In these circumstances we may seek amendments to proposals to ensure that the significance of an asset is appropriately preserved or enhanced.
- 6.8. Proposals affecting heritage assets should be of the highest architectural and urban design quality, having regard to and respecting local character and other policies in this plan. Heritage should be considered as an integral component of sustainable communities and must meaningfully inform the design of development. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported, subject to meeting other policy requirements.
- 6.9. Proposals that may cause harm to the significance of heritage assets should be clearly and convincingly justified through the information provided in the Heritage Statement. Where the loss or harm to a heritage asset is suitably justified and planning consent is granted, a programme of building recording of a level appropriate to the significance of the building and the extent of loss may be required. Such measures will help to mitigate impacts of development and will normally be sought by way of a planning condition.
- 6.10. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be taken into account in planning decisions.
- 6.11. We strongly advise applicants to seek the advice of specialist historic environment consultants at an early stage of the design process. This will help to ensure that the significance of heritage assets likely to be affected is appropriately identified. Applicants will then be better placed to consider options for bespoke and sensitive, heritage-led design solutions that respond to this significance. Specialist consultants can also advise on and provide the necessary information to support an application.
- 6.12. To support conservation objectives through the development management process the council may use powers available to it. This includes the use of Article 4 Directions to remove permitted development rights, along with the use of Section 215 notices, Urgent Works or repair notices where this would help achieve conservation objectives. The use of such powers may be appropriate where there is a risk to historic fabric or the appearance of an area. There are Article 4 Directions in place for many of the Borough's Conservation Areas, and we will investigate the scope for introducing these elsewhere.
- 6.13. Historic England maintains a Heritage at Risk register to assist in the monitoring and management of Listed Buildings and conservation areas that are at risk of losing their special interest. The council has statutory authority to intervene when there is evidence of serious neglect, including Urgent Works Notices to secure

works to vacant listed buildings or unlisted buildings in conservation areas and has powers of inspection.

## HE 2 Designated heritage assets

### Maritime Greenwich World Heritage Site Buffer Zone

- A. Development proposals affecting the Maritime Greenwich World Heritage Site Buffer Zone must protect and preserve the significance, integrity and authenticity of its 'Outstanding Universal Value', as well as its setting and the views to and from it. All proposals will be considered having regard to the Maritime Greenwich World Heritage Site Management Plan and the official UNESCO Statement of Outstanding Universal Value.

### Conservation Areas

- B. Within Conservation Areas proposals for new development (including alterations and extensions to existing buildings) will be supported where they:
- a. Preserve or enhance the special character and appearance of the Conservation Area having particular regard to:
    - i. Townscape, buildings, rooflines and the relationships between buildings;
    - ii. Plot coverage and open spaces, including gardens;
    - iii. Scale, form, elevational hierarchy, fenestration pattern, ornamentation and materials;
    - iv. Trees, topography, boundaries and other landscape features; and
    - v. Views, from the public and private realm, including streetscape views and views across rear gardens and public open spaces;
  - b. Do not result in an adverse cumulative impact on the special characteristics of a Conservation Area, even if the development in isolation would cause less than substantial harm.
- C. Proposals involving the retention, refurbishment and reinstatement of features that are important to the significance of a Conservation Area will be supported.
- D. Proposals for the redevelopment of sites, buildings and structures that detract from the special characteristics of a Conservation Area will be supported where they will complement and positively impact on the character and significance of the area.
- E. The demolition of buildings or structures that make a positive contribution to the character or appearance of a conservation area will be resisted.
- F. Development on sites adjacent to a Conservation Area must not have a negative impact on the setting or significance of the Conservation Area.

### Listed Buildings

- G. Development proposals that would result in substantial harm to (or total loss of the significance of) a Listed Building and its setting will be strongly resisted, in line with the NPPF.
- H. Proposals involving Listed Buildings (including alterations, extensions, refurbishment and repairs) will only be supported where:
  - a. They relate sensitively to the building, and preserve or enhance its significance;
  - b. The setting of Listed Building is preserved or enhanced to better reveal the significance of the asset;
  - c. Important views, both of and from, the Listed Building are protected; and
  - d. Less than substantial harm to the Listed Building is avoided, or where this is not possible, then any harm is clearly and convincingly justified, and demonstrated to be outweighed by public benefit, in accordance with the NPPF.
- I. Development proposals within the curtilage of a Listed Building should be sensitively designed and provide an appropriate site-specific response to :
  - a. Preserve the integrity of the relationship between the Listed Building and its site and setting;
  - b. Ensure there is no adverse impact on the future viability of the Listed Building.

#### Scheduled Ancient Monuments

- J. Proposals for development or work that is expected to affect a Scheduled Ancient Monument will be assessed in consultation with Historic England and applications for planning permission should be submitted in parallel with applications for Scheduled Monument Consent.
- K. Archaeological investigation will be expected to be undertaken prior to the submission of an application. The results of this investigation should demonstrably inform the proposed development or works. Where consent is granted, conditions may be used to secure further detailed investigations and appropriate mitigation works, along with a programme of recording, interpretation and dissemination of evidence found during the investigations. Development will be expected to preserve significant archaeological remains in situ.
- L. Proposals that result in harm to the significance of a monument or its setting will be required to provide clear and convincing justification, and demonstrate that the harm is outweighed by public benefit, in accordance with the NPPF.

#### Registered Parks and Gardens and London Squares

- M. Development proposals will be expected to safeguard the features which form part of the special character or appearance of a Registered Park, Garden or Square. They should also ensure development does not detract from the layout, design, character, appearance and setting of the asset, or harm key views into and out of the space.

## Explanation

### Maritime Greenwich World Heritage Site Buffer Zone

- 6.14. World Heritage Sites are designated heritage assets of the highest order. The UNESCO declared Maritime Greenwich World Heritage Site is located adjacent to the northeast boundary of Lewisham. Its 'Buffer Zone' stretches into the Borough covering a part of Blackheath, as shown on the Policies Map.
- 6.15. As stated in the Maritime Greenwich World Heritage Site Management Plan (2014), a Buffer Zone is an area surrounding a World Heritage Site which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the site. This should include the immediate setting of the site, important views and other areas or attributes that are functionally important as a support to the site and its protection. This includes continuation of the Grand Axis from the World Heritage site to All Saints Blackheath Church and the openness of the heath, which the Local Plan broadly seeks to maintain and enhance. Blackheath's open character, and drama of approach, both support the Outstanding Universal Value of the Maritime Greenwich World Heritage Site and its designation as a Conservation Area.

### Conservation Areas

- 6.16. Conservation Areas play an important role in shaping local urban character and identity. The council has a statutory duty to preserve the character of Conservation Areas under Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990. Conservation Area designation should not preclude appropriately located and sensitively designed development from coming forward. Indeed, the emphasis on Conservation Area management is to ensure that new development positively contributes to the area in which it is situated.
- 6.17. Lewisham's Conservation Areas are areas of high townscape value that hold particular significance in the story of the Borough's historic development and which underpin its distinctive local character. Applicants are strongly advised to refer the council's Conservation Area Appraisals early in the planning and design stage. The appraisals should be the starting point for understanding the significance of a site, building, structure or other feature and the contribution it makes to the surrounding area. We will continue a rolling programme of producing and updating character appraisals for each of the Borough's Conservation Areas.
- 6.18. The character of a Conservation Area can depend heavily on the cohesiveness of form, consistency of materials and detailing of buildings. The alteration or loss of one individual feature to a building may appear minor in the wider context, but incrementally such small changes can erode the special interest of an area. We have made Article 4 Directions to a number of Conservation Areas to help prevent the loss of important and distinctive features, and will continue to do this where it is considered necessary.

- 6.19. We strongly encourage the reinstatement of original or other features that make a positive contribution to a Conservation Area. Such works can help to enhance or better reveal the area's significance. This includes the reinstatement or repair of features such as front boundary walls and fences, front garden soft landscaping and missing architectural detailing.
- 6.20. Not all elements of a Conservation Area contribute to its significance. Some buildings or features can have a negative or neutral impact. The adaptive re-use of redundant buildings and new infill development on disused land or under-utilised sites can represent an opportunity for enhancement. We will therefore support in principle such redevelopment where this will positively impact on and improve local character.

#### Listed Buildings

- 6.21. The council has a duty to preserve the character of Listed Buildings under Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990. We will seek to ensure that the significance of a Listed Building is not harmed through inappropriate development to it, to structures or features in its curtilage, or by new development in its setting. Proposals will need to be informed by an understanding the significance of a Listed Building and its wider setting, irrespective of whether works are proposed to the Listed Building itself. Planning permission and/or listed building consent will only be granted where the relevant requirements are satisfied.
- 6.22. The best way of securing the upkeep of historic buildings and areas is to keep them in active use. It is recognised that buildings and structures will often necessitate some degree of adaptation. The range and acceptability of proposed uses must therefore be a major consideration, particularly where Listed Buildings are concerned. The conversion of Listed Buildings to new or different uses can result in harmful impacts to the building's significance. This is due to works to the historic fabric (for instance related to the insertion of new service routes, vents and ducts) or plan form (for instance subdividing floor spaces to create additional units).
- 6.23. We will seek to ensure that extensions and other works or alterations to Listed Buildings are restricted to the less significant parts of the building. Proposals will be required to provide full details of the development or associated works. This is in order that the impacts can be appropriately assessed. This must include details of any ancillary works of servicing, extraction, fire separation, access, and sound and thermal insulation. In many cases non-standard approaches and materials will be necessary to respond sensitively to the historic building fabric and form. The cumulative impact of works that, in isolation, may cause only minor harm will also be considered.
- 6.24. Where development in the curtilage of a Listed Building is justified by the applicant as necessary to ensure its future viability or repair, and/or is classed as

enabling development, full financial viability details will be required to be submitted.

#### Scheduled Ancient Monuments

- 6.25. The effect of a proposal on the archaeological value or special interest of a scheduled ancient monument is a material consideration in determining a planning application.
- 6.26. The best way to avoid loss of significance of buried archaeological remains is to preserve them in situ. Where this cannot be done, provision for excavation and recording will be required to be undertaken prior to development, or required by condition during development.
- 6.27. Lewisham has one Scheduled Ancient Monument, the Tudor Naval Storehouse in the former Royal Naval Shipyard, Deptford, now known as Convoys Wharf. Following investigations in the 20<sup>th</sup> century, the archaeological interest of the Dockyard and adjacent Sayes Court Manor site as a whole was recognised by the Secretary of State to be of equivalent significance to a scheduled monument, and therefore the whole site should be considered subject to the policies for designated heritage assets, as required by NPPF footnote 63.

#### Registered Parks and Gardens and London Squares

- 6.28. The inclusion of a site on the Register of Parks and Gardens or listed as a London Square is a material consideration in determining a planning application. The significance of the site includes the contribution made by boundary walls, buildings and features within it, as well as historic landscaping schemes and planting. Social, cultural and artistic values are likely to be important alongside historic and architectural values.

#### MAP – CONSERVATION AREAS / WORLD HERITAGE BUFFER ZONE

### HE 3 Non-designated heritage assets

#### Locally listed buildings and other non-designated assets

- A. Development proposals will be supported where they preserve or enhance the significance of a locally listed building or other non-designated heritage asset, and the asset's setting. In particular, proposals for the sensitive retention, refurbishment and appropriate re-use of non-designated assets will be considered favourably.
- B. Proposals that unjustifiably harm the significance of a non-designated heritage asset and its setting will be strongly resisted.
- C. Non-designated heritage assets may be identified during the development management process, in line with [Policy HE1 \(Lewisham's historic environment\)](#).

#### Areas of Special Local Character

- D. Within Areas of Special Local Character development proposals will be expected to:
  - a. Preserve the characteristics that contribute to the area's significance, including the spatial, architectural, townscape, landscape or archaeological distinctiveness;
  - b. Secure the retention of unlisted buildings where these contribute positively to the local distinctiveness of the area; and
  - c. Ensure development in its setting preserves the area's significance.

#### Archaeology

- E. Proposals affecting archaeological interests will be assessed having regard to the impact on the significance of the archaeological asset and its setting. Development proposals should refer to the Greater London Historic Environment Record to assess the likelihood of archaeological deposits being present on a site. Known areas with high likelihood of archaeological deposits are identified as Archaeological Priority Areas (APAs).
- F. In order to ensure assets are appropriately identified and managed the council will:
  - a. Require the necessary level of assessment, investigation and recording, in consultation with the Greater London Archaeological Advisory Service (GLAAS) for development proposals that affect, or have the potential to affect Lewisham's archaeological heritage; and
  - b. Expect applicants to have sought pre-application advice from GLAAS before designing a programme of archaeological investigation. .
- G. Proposals on sites that lie within or adjacent to an APA must be accompanied by an archaeological assessment. The assessment will be expected to identify and describe the significance of the archaeological interest of the site, including any contribution made by the archaeological setting of the site, and describe the impact of the proposed development on the archaeological resource. Where it is established that a further site specific survey and/or intervention is necessary, proposals will be expected to submit a Written Scheme of Investigation which ensures adequate arrangements for:
  - a. Investigation, recording, and archiving of assets of archaeological importance, whether of national or local importance;
  - b. Seeking opportunities to integrate archaeological evidence into the development, including through design and interpretation material; and
  - c. Public engagement, including dissemination of the findings to further understanding of the historic environment.
- H. Subterranean development outside the Borough's Archaeological Priority Areas must consider the potential for discovery of archaeological evidence. The site should be checked against the GLHER for archaeological potential, and this information should be submitted in a Planning Statement. Requirements for further investigation will be secured by condition where necessary.
- I. Priority should be given to the preservation and management of an archaeological asset and its setting in situ, commensurate with the significance of the asset. If this is

not possible, sites should be excavated, deposits removed a report produced, significant finds archived and the results disseminated, as required by condition.

- J. Where remains unexpectedly come to light, the council will seek to ensure their preservation or recording in consultation with the applicant and/or developer.

### Explanation

- 6.29. Non-designated heritage assets include Locally Listed buildings and structures, Areas of Special Local Character, Archaeological deposits, including known areas of high archaeological interest known as Archaeological Priority Areas (APAs), buildings structures and features within conservation areas that are identified to make a positive contribution, unlisted historic street furniture, local parks and gardens of historic interest (which are not Registered), historic townscapes and buildings of townscape merit.
- 6.30. Lewisham contains many buildings and structures that are not statutorily listed but are nonetheless of special historic, architectural, townscape, social or cultural interest in their local area, and greatly contribute to the Borough's distinctiveness and sense of place. The council has a rolling programme of evaluating and recognising their importance and value, through periodic reviews and updates of the Local List
- 6.31. Areas of coherent local historic or architectural interest where the group value is more significant than the interest of individual buildings are identified by the council as Areas of Special Local Character. These areas will, from time to time, be assessed for designation as Conservation Areas, and where they demonstrate suitable architectural, townscape, environmental quality and/or historic interest public consultation will be undertaken on proposals for designation. If they do not meet the criteria they will nonetheless continue to be considered of special local interest to the Borough and will remain as Areas of Special Local Character. The list of these areas along with details for each can be found in **Appendix X**.

### Identifying heritage assets.

- 6.32. In line with **Policy HE1 (Lewisham's historic environment)**, the council will continue to seek to identify new heritage assets to broaden public understanding and appreciation of the historic environment. Non-designated assets may be identified through Borough-wide reviews, through nomination by members of the community or by the council when assessing planning applications. The council's approach to all newly identified assets is:
1. To identify the nature and extent of the asset;
  2. To assess its architectural, historic and archaeological significance against adopted criteria for e.g. Conservation Areas, Locally Listed Buildings ; and
  3. If it meets the adopted criteria, undertake public consultation on the proposal to designate as a Conservation Area, to add it to the Local List.

- 6.33. The council maintains a 'live' list of non-designated heritage assets that have been identified but have not yet been assessed and these are reviewed and updated from time to time.

#### Archaeology

- 6.34. An Archaeological Priority Area (APA) is a defined area where, according to existing information, there is significant known archaeological interest or particular potential for new discoveries. In London, APA boundaries are drawn by GLAAS and based on evidence held in the Greater London Historic Environment Record. Lewisham is particularly rich in known areas of archaeological interest, dating to the prehistoric, Roman and medieval periods. These are identified on the Policies Map and **Appendix X**.
- 6.35. Development should avoid harm to or loss of archaeological deposits of significance and any harm will require justification. Archaeological remains of local importance should be preserved in situ unless the public benefits of the development outweigh the loss of the remains. Where it is suitably demonstrated that archaeological remains cannot be preserved in situ the council will require that the remains are appropriately excavated, recorded, archived, published, interpreted and displayed through a detailed planned programme of works. There may also be a requirement for a programme of public engagement in order that the results of significant archaeological discoveries are disseminated. The scale of public engagement will be based upon on the significance and interest of what is found, and may involve site visits for the public or other means of on-site and off-site viewing.

#### MAP – AREAS OF SPECIAL LOCAL CHARACTER

### HE 4 Enabling development

- A. Proposals for enabling development that secure the future of a heritage asset, but would otherwise conflict with planning policies, will only be supported where it can be suitably demonstrated that the development:
- Will not materially harm the heritage values of the asset or its setting;
  - Avoids detrimental fragmentation of management of the asset;
  - Will secure the long-term future of the asset and, where applicable, its continued use for a sympathetic purpose;
  - Is necessary to resolve problems arising from the inherent needs of the asset, rather than the circumstances of the present owner, or the purchase price paid;
  - Is not otherwise viable owing to insufficient subsidy is not available from any other source; and
  - Is the minimum necessary to secure the future of the asset, and that its form minimises harm to other public interests.
- B. In addition to meeting the criteria of (A) above, proposals will only be acceptable where it is demonstrated that the public benefit of securing the future of the

significance of the asset through such enabling development decisively outweighs the disbenefits of departing from planning policies.

### **Explanation**

- 6.36. We are committed to ensuring all reasonable steps have been taken to secure the future of heritage assets without compromising their significance. All development will be expected to avoid harm to or loss of heritage assets. Careful consideration should therefore be given to conservation objectives at the earliest stages in the planning and design process. The council will seek to work with applicants to identify appropriate means of delivering development that avoids or mitigates harm, including through pre-application discussions. Understanding the significance of the site, designing new interventions that leave the most significant spaces unaltered, and concentrating new work in areas of lesser significance is more likely to achieve a successful scheme. New works may also be required by Building Regulations and therefore seeking early advice from both Planning and Building Control is advisable to ensure that a sensitive solution can be found.
- 6.37. The NPPF provides that 'enabling development' may be justifiable in certain circumstances. Whilst the council will work proactively to help ensure that the conservation value of its heritage assets is not diminished, it also accepts that there may come a point where enabling development is the only viable means of securing their long term future. Proposals for enabling development must be supported by evidence demonstrating that development is the optimum viable use (i.e. the use that is likely to cause the least harm to the significance of an asset) in line with national planning guidance.
- 6.38. We will use the Historic England standing guidance, "Enabling Development and the Conservation of Significant Places" (2012), in the consideration of development proposals and supporting evidence. Applicants are strongly advised to have regard to this guidance when considering proposals.
- 6.39. Where harm to an asset or its setting is proposed on the grounds that repair on its own is not economically viable, applicants must submit justification setting out:
1. A valuation of the existing site;
  2. A full survey identifying the repairs required;
  3. Development costs including a costed schedule of repairs;
  4. An estimate of the value of the repaired property, including potential yields;
  5. Evidence that alternative sources of funding for repairs are not available; and
  6. Evidence that the property has been marketed for a reasonable period at a price reflecting its condition.

## 7 Housing

### HO 1 Meeting Lewisham's housing needs

Lewisham's strategic housing target

- A. The council will work positively and proactively with key stakeholders and development industry partners to facilitate a significant increase in the delivery of new homes to help meet Lewisham's housing needs. Development proposals must make the best use of land and optimise the capacity of housing sites in order to ensure:
  - a. The **draft** London Plan minimum ten-year target of 16,670 net housing completions over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded; and
  - b. That delivery against Lewisham's Local Housing Need figure of 2,964 net housing completions per year is maximised.
- B. The council will keep under review the Local Plan strategic housing target. Where changes to London Plan policies are made, including the strategic borough-level housing targets, the local plan review process will be used to ensure Lewisham's local policies remain in general conformity with the London Plan.

Increasing housing supply

- C. A carefully managed uplift in the delivery of new housing development across the Borough, with priority given to genuinely affordable housing, will be achieved by:
  - a. Directing new residential development to Opportunity Areas, strategic corridors, town centres and other well-connected and sustainable locations, consistent with the spatial strategy for the Borough, in line with **Policy OL1 (Delivering an Open Lewisham)**;
  - b. Allocating strategic sites for new housing development, including mixed-use development, and supporting proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these;
  - c. Facilitating the sensitive intensification of residential areas, and supporting the development of small sites for housing, in line with **Policy HO2 (Optimising the use of small sites)**;
  - d. Undertaking a programme of housing estate maintenance, renewal and regeneration that ensures high quality housing provision, results in no net loss of affordable housing and delivers an uplift in affordable housing wherever possible;
  - e. Ensuring that all development proposals make the best use of land and optimise the density of housing sites, in line with **Policy QD6 (Optimising site capacity)**;
  - f. Making the best use of the existing housing stock, including by using available tools to bring vacant units back into use and to regulate the use of homes for short-stay visitor accommodation; and

- g. Strongly resisting development that would result in the net loss of housing unless:
  - i. It is suitably replaced at existing or higher densities with at least the equivalent level of new residential floorspace; or
  - ii. The proposal is for strategic infrastructure that demonstrably meets an identified need and is necessary to support delivery of the spatial strategy for the Borough.

#### Inclusive and mixed communities

- D. All proposals for housing development must contribute to and support inclusive and mixed communities across Lewisham. Development will be required to deliver an appropriate mix of housing within the site and locality having regard to individual site circumstances (including location, character, and nature and scale of development proposed) along with:
  - a. The strategic target for 50% of all new homes delivered in the Borough to be for genuinely affordable housing;
  - b. The required mix of tenure types for affordable housing, in line with [Policy HO 3 \(Genuinely affordable housing\)](#);
  - c. The need for provision of a mix of unit sizes to meet local need, including the target unit size mix for affordable housing set out in the council's Housing Strategy, or other strategies and evidence base documents, as appropriate;
  - d. The need for provision of family housing units (3+ bedrooms), with an element of such provision expected to be delivered on schemes of 10 or more dwellings; and
  - e. The delivery of sustainable neighbourhoods that are appropriately supported by community and other strategic infrastructure.
- E. Development proposals will be resisted where they comprise solely of studios and/or 1 bedroom, 1 person units, or result in an overconcentration of 1 or 2 bedroom units on a site or locality, unless it can be demonstrated that the provision:
  - a. Is located in an area that benefits from good public transport accessibility; and
  - b. Forms part of a larger development that includes appropriate provision for a wider mix of unit sizes, including family size units; or
  - c. Is sited in a locality that benefits from good provision of larger and family size units, and would therefore provide for a better balance in the mix of unit sizes in the area; or
  - d. Is the only housing format deliverable owing to site size or other development constraints, and where a studio unit is proposed, it is of an exceptional design quality.

#### Housing choice

- F. To help ensure that local residents have access to a wide range of suitable housing provision, the council will:
  - a. Seek that development delivers a wide range of genuinely affordable and other housing products, including market housing, to meet the needs of households of different sizes and income levels;

- b. Support proposals that are targeted to meeting the needs of specific groups including: families with children, older people, people with disabilities, students and vulnerable people;
- c. Promote and support innovative housing designs, such as modular housing, particularly where these address acute or specialist local housing needs;
- d. Support appropriate proposals for self-build or custom build housing, and seek to identify land to help facilitate such development where a need is clearly established; and
- e. Encourage developers and agents to market new housing units for sale or rent to existing local residents and workers before advertising them more widely to others.

## Explanation

### Lewisham's strategic housing target

- 7.1. The London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the Capital. The London-wide Strategic Housing Market Assessment (SHMA), which informed the preparation of the **draft London Plan**, identifies a need for some 66,000 additional homes per year to be delivered across London. To accommodate this need for housing the London Mayor advocates for fundamentally new approaches to housing delivery. The London Plan policies seek to achieve a significant uplift in housing across the region. They are set in the context of the limited availability of developable land in a highly urbanised, world city and the competing pressures for different land uses. The policies also respond to the need for major investment in strategic infrastructure, particularly public transport, to support housing growth on this scale and to unlock the full development potential of areas and sites.
- 7.2. In order to address the identified housing needs for the region, the **draft** London Plan sets out 10-year housing targets. It then directs local authorities to include the relevant borough-level targets within their local plans. These targets have been informed by the London-wide Strategic Housing Land Availability Assessment (SHLAA), which considered the potential development capacity of large sites (0.25 hectares or more) across the region. Boroughs are also required to set a positive planning framework to meet and wherever possible exceed the London Plan housing targets. For Lewisham, the 10-year strategic housing target is 16,670 net housing completions (or 1,667 net completions per year).<sup>13</sup>
- 7.3. The NPPF (2019) and its associated Planning Practice Guidance establish a standard method for determining the minimum number of homes needed in an area. Planning authorities are required to use this standard method for calculating 'Local Housing Need' in preparing their Local Plans, unless it can be demonstrated

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<sup>13</sup> These figures represent the housing targets as set out in the "London Plan Examination in Public Panel Report – Panel Recommendations October 2019". The London Mayor is currently considering the Panel report and recommendations and is preparing an Intend to Publish version of the London Plan, which will be sent to the Secretary of State alongside with a schedule of the panel's recommendation and the Mayor's response to them.

there are exceptional circumstances to justify the use of another method.<sup>14</sup> The **draft** London Plan was not required to use this standard approach in setting its revised housing targets. This is owing to the Government's transitional arrangements for implementing the new NPPF, which enabled the **draft London Plan** to be prepared and, through its Examination in Public, assessed against the previous version of the NPPF (2012). However, Lewisham's new Local Plan will be assessed against the current NPPF at its independent examination.

- 7.4. It is imperative that we prepare Lewisham's new Local Plan having regard to the **draft** London Plan, including the borough-level housing targets, in order to ensure it aligns with the spatial development strategy for the region. At the same time, we must ensure that national planning policy requirements are satisfied. Through the Lewisham Strategic Housing Market Assessment (2019), we have calculated the Local Housing Need (LHN) figure for the Borough, in line with the NPPF. The SHMA indicates that the current position for the borough is a minimum housing need figure of 1,939 net units per year based on the 2016 London Plan target, and 2,964 net units per year based on the **draft** London Plan target. These LHN figures are significantly higher than Lewisham's strategic housing target set out in both the current and **draft** London Plan.
- 7.5. The Local Housing Need figure is not in itself a housing target. Rather, it is a starting point for considering the level of housing need that should be addressed through the plan-making process. Lewisham's new Local Plan is being progressed in the interim period where a future review of the London Plan, taking into account the latest NPPF, is pending. There is, as of yet, no clear indication of how or whether the standard method for LHN will be taken forward by the London Mayor in the regional planning context. We are therefore taking a pragmatic approach at this time, by calculating the LHN figure and assessing whether it can be realistically achieved within Lewisham over the new plan period. To help inform this assessment we have undertaken a number of exercises including:
- A comprehensive review of land and sites available for development in the Borough, including by participating in the London-wide SHLAA;
  - Undertaking of several 'call for sites' exercises inviting the public, including landowners, developers and agents, to help identify sites that might be suitable for different types of development;
  - A Metropolitan Open Land Review to understand how the Borough's MOL is performing and whether there is scope to release any parts of this land to other uses, including for housing;
  - Scrutiny of potential development sites to establish whether they are deliverable and developable<sup>15</sup>, including through engagement with land owners, in the early stages of plan preparation;

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<sup>14</sup> NPPF (2019), paragraph 60.

<sup>15</sup> Deliverable and developable as defined by NPPF, paragraph 67.

- Detailed assessments of the development capacity of potential development sites, taking into account the uplift in density and overall site capacity that could be achieved through the delivery of planned strategic transport infrastructure, particularly the Bakerloo line upgrade and extension to Hayes.
- 7.6. Through the above exercises, we have identified specific large sites which, combined with windfall delivery rates on smaller sites, have the potential to deliver roughly 17,000 net new homes across Lewisham over the 10-year period 2020-2030, and 25,000 net new homes over the 15-year period 2020-2035. This is sufficient to meet the draft London Plan housing target, however meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham's unique circumstances, particularly the need for strategic transport infrastructure to unlock the .
- 7.7. For the purpose of monitoring housing completions, we will consider net changes on conventional and non-conventional forms of housing in line with the London Plan. For the avoidance of doubt, non-self-contained accommodation for students will be counted on a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Non-self-contained accommodation for older people (C2 use class) will be counted on a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation will count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home.
- 7.8. Through this Regulation 18 consultation on Lewisham's Local Plan, we are consulting with the public to better understand whether there are any additional sites that could feasibly be delivered within the plan period, and whether the strategic sites (site allocations) included in Part 3 of the Local Plan are deliverable and developable, particularly within the indicative timeframes set out.
- 7.9. In addition, through the Duty to Cooperate we are taking the opportunity to continue engaging with neighbouring authorities to understand whether they are, or will be, in a position to assist in accommodating any residual local housing need that may need to be addressed outside of the Borough.
- 7.10. Informed by outcomes of this Regulation 18 consultation, we will confirm an evidence-based housing target for Lewisham. We will also consider the options available for managing delivery towards the target over the plan period. This may include the need for the use of a 'stepped housing trajectory' to ensure that Lewisham's housing target reflects our latest knowledge on the expected phasing of larger development sites (including sites with planning consent) and the delivery of strategic transport infrastructure.
- 7.11. The council will keep under review the adopted Local Plan strategic housing target, having particular regard to the London Plan. Where any future amendments are made to the London Plan, including to the borough-level housing targets, then the council will consider the necessity for a local plan review

in order to ensure its local policies remain in general conformity with regional planning policies, and the spatial development strategy for London.  
Increasing housing supply

- 7.12. The Local Plan seeks to facilitate a carefully managed uplift in the delivery of new housing development across the Borough to meet local needs, with priority given to genuinely affordable housing. There are a number of different routes to increasing housing supply which reflect the varying scale of opportunities available. These range from enforcement action to bring vacant housing units back into use, the sensitive intensification of small sites, and more strategically, the comprehensive redevelopment of larger site allocations. All such routes relate to the spatial strategy for the Borough, which aims to direct development across the Borough in an efficient and sustainable way. We will work with development industry partners and other stakeholders to identify opportunities to optimise the capacity of sites that are suitable for new housing, ensuring that development will be appropriately supported by infrastructure.

Inclusive and mixed communities

- 7.13. Lewisham is a diverse Borough comprising of many vibrant and distinctive communities, which makes it an exciting place to visit and live. However, it also ranks amongst the most deprived local authority areas in England with pockets of social and economic deprivation scattered across the Borough. We are committed to achieving inclusive and mixed communities, particularly in a way that is targeted at addressing the underlying causes of deprivation. The Local Plan seeks to facilitate a significant uplift in housing and our expectation is that new development should respond to existing imbalances in provision, so to better meet local needs and contribute to sustainable communities. This policy sets the strategic approach for securing an appropriate mix of housing when new development comes forward.
- 7.14. There is a significant need for more affordable housing in the Borough, as set out in the London Strategic Housing Market Assessment (2017) and Lewisham Strategic Housing Market Assessment (2019). Consistent with the **draft London Plan**, we will seek that development contributes towards the Borough's strategic target of 50 per cent of new homes to be genuinely affordable. Residential development proposals will be expected to maximise the amount of affordable housing on-site, subject to viability, having regard to the requirements in **Policy HO 3 (Genuinely affordable housing)**. The strategic target is for delivery across the Borough recognising a number of sites are likely to make provision in excess of the target, such as those associated with registered providers. We will work proactively with partners and industry stakeholders, including private developers, to secure the delivery of more high quality and genuinely affordable housing.
- 7.15. Development will be expected to respond to local need by securing a mix of dwelling sizes (in terms of occupancy measured by bed spaces), particularly family sized units (i.e. 3+ bedrooms). All proposals for major residential development will be expected to make provision for an element of family housing.

Minor development proposals incorporating family sized units will be considered favourably. We will seek to resist against proposals involving the loss of family sized units (including through demolition and redevelopment). For affordable housing, proposals should have regard to the recommended unit size mix set out in the council's Housing Strategy. All development proposals will be expected to demonstrate how the dwelling size mix is appropriate to the site in contributing to inclusive and mixed communities. This includes consideration of existing and planned community infrastructure, and other strategic infrastructure, necessary to support the development and its likely occupiers. We will assess proposals having regard to the location and size of the site, the nature and scale of development, along with the existing mix of unit sizes within the locality.

- 7.16. To help secure inclusive and mixed communities, we will resist proposals that comprise solely of studios and 1 bedroom, 1 person units or those that would result in an overconcentration of 1 or 2 bedroom units on a site or locality. This policy is considered to provide sufficient flexibility to respond to individual site circumstances, such as where there are site constraints or where proposals for provision would demonstrably enhance the mix and balance of housing unit types within a locality. Studio units intended for single person occupation are not considered to provide a long-term, sustainable solution to meeting local housing need. In exceptional cases, proposals for studio units may be permitted where minimum space standards are satisfied and the development is appropriately located, in highly accessible area that benefits from good provision of local amenities.

#### Housing choice

- 7.17. The availability of a wide range of housing choices, with provision for a mix and balance of housing types, sizes and tenures is essential to the achievement of inclusive communities. Therefore, we will generally support proposals that enhance housing choice and access in the locality, including for new specialist forms of accommodation tailored to specific groups (including older people, students, those with disabilities and vulnerable people). The Local Plan sets out additional policies that address the unique housing requirements of such groups, having regard to identified needs, including QD2 (Inclusive and safe design), HO5 (Accommodation for older people), HO6 (Supported housing) and HO7 (Purpose built student accommodation).
- 7.18. Lewisham is gaining a reputation as a location for innovative housing design. For example, PLACE/Ladywell is an award winning scheme recognised for its pioneering off-site construction techniques and modular building format. It comprises of temporary accommodation for homeless families and start-up space for local businesses and retailers. We are broadly supportive of proposals for such innovative housing designs where they comply with other Local Plan policies. On proposals involving meanwhile uses, we will take a positive and flexible approach to decisions if it can be demonstrated that development helps to meet identified local housing needs, makes a positive contribution to the locality

and does not adversely impact on amenity. Further requirements are set out in policy [EC22 \(Meanwhile uses\)](#).

- 7.19. Those currently living or working locally in the Borough should have a good opportunity to access new housing as it is made available on the private market. We will therefore encourage developers and agents to advertise new units locally, ideally for a period of 3 months, before marketing them more widely. Whilst the council exercises no planning control in this respect, it will broadly support developers and agents in making a reasonable proportion of new residential units available to local residents and UK citizens, particularly for owner occupation.

## HO 2 Optimising the use of small housing sites

- A. The development of small sites will play an important role in increasing housing supply in Lewisham and supporting provision for a wide range of high quality and affordable homes. Opportunities should be taken to optimise the capacity of small sites for new housing development across the Borough, including through:
- Redevelopment of vacant and underused brownfield sites, and ancillary buildings such as garages;
  - Residential conversions, having regard to [Policy HO2.E](#) below;
  - Residential alterations and extensions, having regard to [Policy QD10 \(Building alterations, extensions and basement development\)](#); and
  - Infill, backland, and garden land development, having regard to [Policy QD11 \(Infill and backland sites, garden land and amenity areas\)](#).
- B. To help facilitate the appropriate development of small sites for housing, including through the sensitive intensification of existing buildings and sites, the council will prepare a suite of supplementary planning documents. Development proposals will be expected to have regard to this planning guidance, where relevant, and demonstrate how it has been used to inform the development through the design-led process.
- C. Development proposals for housing on small sites will be supported where they help to facilitate the delivery of the spatial strategy for the Borough and:
- Are appropriately located for residential use;
  - Are designed to a high quality standard with accommodation that meets the relevant standards for private internal and outdoor space, having particular regard to [Policy HO5 \(High quality housing design\)](#);
  - Positively respond to local character, including historical character;
  - Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
  - Contribute towards the delivery of affordable housing, in line with [Policy HO3.J \(Genuinely affordable housing\)](#);
  - Protect and do not adversely impact on local amenity;
  - Do not result in the loss of community infrastructure, having regard to [Policy CI1 \(Safeguarding and securing community infrastructure\)](#); and
  - Do not prejudice the delivery of strategic site allocations.

- D. Neighbourhood forums are strongly encouraged to identify locations and allocate sites appropriate for housing development, including small sites, within neighbourhood plans.

#### Housing conversions

- E. In order to maintain a supply of housing suitable for families, proposals for the conversion of a single family dwelling, or self-contained unit with 3+ bedrooms, into smaller self-contained residential units (including flats) will only be supported where:
- The gross internal floor space of the existing dwelling is 130 sq. metres or greater;
  - A family sized unit (3+ bedrooms) is re-provided, unless it is demonstrated that the property is not suitable for family accommodation due to environmental or other site constraints;
  - All housing units benefit from a layout and configuration that is practical for residential occupation, and the development complies with other relevant policy requirements for housing and high quality design;
  - In the situation garden land is available, access to this private amenity space is maintained for the existing family unit, and wherever possible, made accessible to residents in other units; and
  - It is demonstrated that existing and additional demands for parking and servicing created by the development can be appropriately accommodated, having regard to other Local Plan policies, including [Policy TR4 \(Parking\)](#) and [SD12 \(Design to support the circular economy\)](#); and
  - The development would not result in an adverse impact on local character and townscape.
- F. Proposals for the conversion of properties into Houses in Multiple Occupation will be considered against [Policy HO 8 \(Houses with Shared Facilities - Houses in Multiple Occupation\)](#).

#### Explanation

- 7.20. The NPPF (2019) places a strong emphasis on the role of small sites in supporting housing delivery. This is also reflected in the [draft](#) London Plan, which introduces a significant step change in the strategic approach to meeting housing need across the Capital. As part of this approach, it seeks to increase the rate of housing delivery from smaller sites. This is particularly in highly accessible residential and outer suburban areas, where there are considered to be key opportunities to intensify sites. All boroughs are expected to help facilitate the development of small sites in a positive and proactive way. This policy establishes our approach to ensuring that small site development is appropriately managed in the Lewisham context.
- 7.21. The [draft](#) London Plan sets out a 'small sites' housing target for every borough. Small sites are defined as those that are less than 0.25 hectares. The targets are based on trends in housing completions on sites of this size. The small sites

target is a component of, and not additional to, the overall housing target set by the **draft** London Plan. For Lewisham, the small sites target for the ten-year period from 2019/20 is 3,790 net housing units, or 379 units per year. This is broadly in line with our monitoring of ‘windfall’ development on small sites in the Borough. The small sites target makes up roughly 23 per cent of the borough’s overall **draft** London Plan target.<sup>16</sup>

- 7.22. Through the Local Plan we are seeking to boost the delivery of small housing development beyond the historic delivery levels. Our aim is not only to meet the **draft** London Plan small sites target but to exceed it, recognising a variety of measures are needed to achieve the overall housing target and meet the range of housing needs of different groups in the Borough. This includes need for genuinely affordable housing. Through the development and sensitive intensification of small sites, there will be more opportunities to secure planning contributions that can be invested in the delivery of new affordable housing units. Furthermore, small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, discussed in Part 3, has a distinctive character and urban grain based on its historic estate development. There is a lack of large site opportunities to generate investment in this area. Small site development provides a mechanism for more incremental investment and area improvement that can help to address the underlying causes of deprivation. In short, our positive approach to small site development is informed by the Local Plan’s strategic objectives, and is not simply a matter of housing numbers.
- 7.23. There are a variety of opportunities and types of small sites that can support new housing development. Vacant and underused brownfield sites along with redundant ancillary facilities, such as garages or residential storage units, present relatively straightforward options for redevelopment. However these types of sites are limited in availability and are often constrained, such as by irregular plot forms, site access issues or land-use designations (including those that protect land for commercial uses). It is therefore expected that the majority of small sites development will occur in existing residential areas, where new homes can be sensitively integrated with other compatible uses. Housing development on small sites can take a number of forms including: new build, infill and backland development, conversion (subdivision of houses into flats), demolition and redevelopment or extension of existing buildings (including upward, rear and side extension, and basement development).
- 7.24. Our approach to housing development on small sites is expected to facilitate the incremental intensification of existing residential areas, particularly where sites have a good Public Transport Accessibility Level (PTAL 3-6) and/or they are within 800 metres of a station or Major/District town centre. It is imperative that

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<sup>16</sup> These figures represent the housing targets as set out in the “London Plan Examination in Public Panel Report – Panel Recommendations October 2019”. The London Mayor is currently considering the Panel report and recommendations and is preparing an Intend to Publish version of the London Plan, which will be sent to the Secretary of State alongside with a schedule of the panel’s recommendation and the Mayor’s response to them

future growth and development occurs in a way that respects and enhances local character, with the distinctive features of Lewisham's communities at the heart of the design-led process. The Lewisham Characterisation Study (2019) identifies areas that are positioned to facilitate an uplift in small housing development, recognising that the physical character of some areas may need to evolve gradually over time, for example, to accommodate new housing and investment in infrastructure. The Characterisation Study defines areas on a spectrum of sensitivity to change, based on local character, taking into account factors such as existing urban grain, historic evolution, building typologies, and spatial strategic growth and regeneration priorities across the Borough. All proposals for small housing development will be expected to refer this document, as a starting point, to understand the scope for intensification in a given area and to gain an appreciation of the key features of local character.

- 7.25. The Characterisation Study must be read in conjunction with other design guidance to ensure that development is appropriate to the site and surrounding area. The council will prepare and make available a suite of guidance documents to assist with the implementation of this policy. This includes existing and additional Conservation Area Appraisals and the Alterations and Extensions SPD (2019). We are also preparing future guidance to support the sensitive intensification of areas, including the A21 Corridor Development Framework and Suburban Improvement, both of which will be prepared with support from the GLA Homebuilding Capacity Fund. This local guidance should be read alongside the design principles for small housing development that the Mayor of London has committed to publishing as part of his review of the GLA design guidance.
- 7.26. Where small housing development is proposed it should not have an unacceptable adverse impact on biodiversity and green infrastructure. Applications will be expected to identify potential impacts in this regard, and clearly set out measures to minimise and mitigate these. Measures may include the return of hard standing to green space, installation of green roofs and walls, and sustainable landscaping. In exceptional circumstances, where site constraints demonstrably preclude the implementation of on-site measures, then off-site provision (for example, tree planting) may be acceptable in order to ensure policy compliance. Off-site provision will be secured on a case-by-case basis through the use legal agreements and/or planning contributions.
- 7.27. This policy presents a new strategic approach to meeting housing need locally. An allowance for small site development has been made in the Local Plan housing trajectory. This sets out the expected rate of housing delivery over the plan period, based on past trends. We will monitor progress towards the small site housing target through the Authority Monitoring Report and consider this policy's effectiveness through the Local Plan review process. Monitoring will also provide us with information to understand the spatial distribution of new small housing development and consider whether interventions are necessary, for example, to ensure those areas where this type of development is concentrated are appropriately supported by community facilities and other strategic infrastructure.

## Housing conversions

- 7.28. The Local Plan seeks to ensure provision for a wide range of housing types and tenures to meet local need, including need arising from families. The conversion of larger and single family homes into flats has in recent years provided a small source of housing supply in Lewisham. Whilst recognising that conversions support delivery towards the strategic housing target, it is important that provision for family accommodation is not compromised. The Local Plan therefore sets out requirements to ensure that family sized units (3+ bedrooms) are retained when residential conversions come forward. This is particularly in light of the Lewisham SHMA (2019), which shows a particular local need for family housing.
- 7.29. There is a limited supply of family sized housing units in the Borough, with SHMA indicating that 1 and 2 bedroom units comprise the majority of existing properties (roughly 60 per cent). Furthermore, monitoring information demonstrates that the vast majority of recent new build residential development has been for flats or apartments, mainly 1 and 2 bedroom units, and it is anticipated that this trend will continue into the future. With the Lewisham SHMA suggesting that there will be an increasing need for family accommodation, we will seek to ensure that existing family sized units are not unnecessarily lost through conversion. This policy is not considered to undermine the presumption in favour of small housing development, as proposals will continue to be supported where adequate family sized units are retained or re-provided.
- 7.30. Whilst we are intent on retaining family sized units on residential conversions, some flexibility may be applied where it can be suitably demonstrated that environmental or other site specific constraints make re-provision of a family sized unit inappropriate. This includes consideration of the site or building size (which might compromise achievement of the minimum space standards for a 3+ bedroom unit), lack of amenity space suitable for a family, or other environmental constraints that would adversely impact on occupants, particularly children and young people.
- 7.31. Having regard to site location, PTAL levels and relevant parking standards, proposals will be required to demonstrate that the residential conversion will be able to cope with any demand for parking arising from the development, including for disabled and cycle parking. Where appropriate, evidence of a parking survey will be required to support the proposal, having particular regard to on-street parking capacity.

## HO 3 Genuinely affordable housing

- A. The strategic target is for 50 per cent of all new homes delivered in Lewisham to be genuinely affordable. The council will seek the maximum amount of genuinely affordable housing to be delivered on new housing developments. Proposals that deliver high quality affordable housing through the Fast Track Route, as detailed in HO3.F below, to achieve a minimum 35% affordable housing will be considered favourably.

- B. The affordable housing requirement will apply to all forms of conventional housing in the C3 Use Class, unsecured student accommodation and, where appropriate, specialist and supported accommodation. Affordable housing requirements for Purpose Built Student Accommodation are set out in Policy HO8 (Purpose Built Student Accommodation).
- C. Proposals involving new housing development will only be supported where the site capacity has been optimised and delivery of affordable housing maximised. The affordable housing requirement will also apply in circumstances where development has already been permitted and:
  - a. New residential units are proposed which would result in an uplift in the overall number of units on the site of the extant permission; and
  - b. Development is proposed on an adjacent site, which, by virtue of its layout, design and use, is functionally related to the extant permission and would result in an uplift in the overall number of units across the sites.
- D. Applicants will be expected to make all reasonable efforts to secure grant funding to deliver an increase in affordable housing beyond the level that would otherwise be achievable. The council will work positively with development industry partners to help identify opportunities to secure grant funding to deliver more genuinely affordable housing in Lewisham. Development proposals will be considered favourably where they demonstrably deliver the maximum viable amount of affordable housing whilst meeting the minimum threshold level of affordable housing without public subsidy, as set out in HO3.F, and secure grant funding to deliver provision of genuinely affordable housing additional to this level.

#### Large sites

- E. Proposals for new housing development, including mixed-use schemes, with site capacity to accommodate 10 or more dwelling units must deliver the maximum amount of genuinely affordable housing, taking into account:
  - a. Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability;
  - b. The need for provision of a mix of secure housing tenures, with the affordable component sought to be provided on the basis of a tenure split of 70 per cent genuinely affordable (social rent or London Affordable Rent) and 30 per cent intermediate (London Living Rent or shared ownership);
  - c. The preferred housing size mix for genuinely affordable housing, as set out in the council's Housing Strategy, or other supporting evidence;
  - d. Availability of public subsidy; and
  - e. Other planning benefits that may be achieved, having particular regard to the delivery of the spatial strategy for the Borough.
- F. A threshold approach to viability will be applied to major development proposals, in accordance with **draft London Plan policy H6 (Threshold approach to applications)**, taking into account the different routes to affordable housing delivery (i.e. Fast Track Route and Viability Tested Route). In Lewisham, the threshold level of affordable

housing on gross residential development, which is not on public sector land, is set at:

- a. A minimum of 35 per cent; or
  - b. 50 percent for Strategic Industrial Locations and Locally Significant Industrial Sites where development would result in a net loss of industrial capacity.
- G. Where the Viability Tested Route is used and a viability assessment is submitted to support the level of affordable housing provision made by a proposal, this must be based on a standard residual valuation approach, with the benchmark existing use value of the land taken as the existing/alternative use value, in line with National Planning Practice Guidance. In order to ensure transparency in the planning process, the viability assessment will be required to be undertaken in line with the Mayor's Affordable Housing and Viability SPG.
- H. To maximise affordable housing delivery and address economic uncertainties that may arise over the lifetime of a development proposal the use of 'review mechanisms' will be required, where appropriate, and implemented in line with the Mayor's Affordable Housing and Viability SPG.
- I. In order to promote inclusive and mixed communities all new affordable housing provision should be delivered on-site. Off-site provision for major development proposals will only be considered in exceptional circumstances, where it can be demonstrated that:
- a. It is not practical or feasible to provide affordable housing on-site due to site development constraints;
  - b. A higher level of affordable housing can be secured through provision on an alternative site;
  - c. Off-site provision is necessary to better meet priority housing need, such as for affordable family housing;
  - d. The provision will better support inclusive and mixed communities.

#### Small sites

- J. Proposals for new housing developments delivering less than 10 dwelling units will be required to make a financial contribution towards the delivery of affordable housing, having regard to the council's Planning Obligations Supplementary Planning Document, or other guidance as appropriate. Proposals should seek to deliver on-site provision wherever practical and feasible, before considering the use of planning contributions to support the delivery of affordable housing off-site.
- K. Development proposals on small sites will also be considered against Policy HO3.C above. Affordable housing requirements for large sites will apply where 10 or more dwelling units are proposed on small housing sites, whether these units are brought forward on one site or together on multiple, functionally related sites.

#### Inclusive and mixed communities

- L. In order to secure inclusive and mixed communities the council may seek to alter the tenure and/or mix of affordable housing provision on a case-by-case basis. In establishing the most appropriate level of provision for a site, proposals will be considered having regard to the existing levels of housing tenure and mix in the area (including extant permissions), along with development viability.
- M. All new affordable housing development must be designed to a high quality standard, having regard to other Local Plan policies. Development should be sensitively integrated into the site and its surroundings, with affordable housing units being indistinguishable from market units in terms of quality of design and materials, space standards, access and amenity provision. Where mixed tenure schemes are proposed, these will be required to ensure all residents of the development have access to amenities and communal spaces, including play spaces.

#### Vacant Building Credit

- N. The application of the Vacant Building Credit (VBC) is not appropriate in Lewisham. The use of VBC will only be considered in limited circumstances, where applicants suitably demonstrate there are exceptional reasons why it is appropriate and the following criteria are met:
  - a. The building is not in use at the time the application is submitted;
  - b. The building is not covered by an extant or recently expired permission;
  - c. The site is not protected for an alternative land use; and
  - d. The building has not been made vacant for the sole purpose of redevelopment, as demonstrated by evidence showing that the building has been vacant for a minimum continuous period of five years and has been actively marketed for at least two years therein, at realistic local area prices.

#### **Explanation**

##### The need for genuinely affordable housing

- 7.32. There is a strong record of housing delivery in Lewisham, with the cumulative London Plan housing target being exceeded since the adoption of the Core Strategy in 2011. The extent of housing delivery is indicative of a strengthening market and growing developer confidence in the Borough. Against this backdrop, however, issues persist with respect to the resident population's ability to access to housing that is affordable within their means.
- 7.33. The Lewisham Strategic Housing Market Assessment (SHMA) indicates that whilst median house prices in Lewisham are lower than those for London on whole they have increased by more than 300 per cent over the past twenty years, marked by an accelerated rate of increase in the five-year period from 2013 to 2017, with median house prices rising from £259,000 to £412,000 in this short period. The rate of increase is significantly higher than that experienced across London and in many neighbouring authorities. Home ownership is now out of reach for many Lewisham residents, particularly first time buyers, with median house prices more than 10 times the average household income. The cost of private rented sector housing has also increased pointedly over recent years. By

2017, average private rents in Lewisham equated to roughly 43 per cent of average household incomes, making this housing option unaffordable to many. The above situation has contributed to acute issues of overcrowding and homelessness in the Borough, which is reflected by the extensive number of households on the council's Housing Register. As of May 2019 there were approximately 10,000 households on the housing waiting list, which represents approximately 7.6% of households in the Borough.<sup>17</sup> In short, the gap between incomes and housing costs is rapidly widening, and as a consequence there is a significant local need for affordable housing.

- 7.34. In light of the above, the Local Plan sets a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. The strategic target is considered to be in line with the **draft** London Plan. However, recognising the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population, a local definition of 'genuinely affordable housing' is necessary. In Lewisham, this means housing at social rent levels or GLA's London Affordable Rent level<sup>18</sup> and below, aiming for target rents. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing. Furthermore, genuinely affordable housing and intermediate housing should provide for secure tenancies. For affordable homes, we will seek that residents are provided with lifetime tenancies, ideally in perpetuity.
- 7.35. Our expectation is that the maximum amount of genuinely affordable housing will be delivered on all new residential development sites, having regard to viability. Habitable rooms will be used as the basis for calculating affordable housing provision against the Borough's strategic target, as advocated by the **draft** London Plan. This measure provides flexibility to deliver affordable housing that is best tailored to meeting the range of local needs, and in particular to enable additional provision of affordable family sized units to come forward.
- 7.36. Affordable housing will be required from all large sites with capacity to accommodate 10 or more residential units, and this applies where development is proposed incrementally. This includes variations to a planning consent resulting in additional units on the site. This policy seeks to guard against actions to circumvent the affordable housing requirements, such as through the artificial sub-division or phased development of sites. In considering whether the affordable housing requirement should apply in these circumstances, we will have regard to: extent of single ownership of land and sites; occupied status of land/sites at the grant of permission and at commencement of development; and the amount of time elapsed between permissions, completions and any new proposals. Contributions towards affordable housing will also be required on small sites for new housing developments delivering less than 10 dwelling units. Our

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<sup>17</sup> Lewisham Housing Department statistics, May 2019.

<sup>18</sup> GLA London Affordable Rent is defined locally as London Affordable Rent, minus the 1% above Consumer Price Index uplift.

latest evidence indicates that this requirement will not adversely impact on the development viability of small sites across the Borough. Further details to support implementation of this policy will be set out in a future update to the Planning Obligations SPD.

- 7.37. In line with the **draft** London Plan, a threshold approach to viability will be applied in Lewisham. This means that schemes meeting or exceeding the **draft** London Plan policy and threshold (as set out in **Policy H6** – ‘Threshold approach to applications’) without public subsidy can be ‘fast-tracked’ and are not required to submit detailed viability information. However, to ensure an applicant fully intends to build out the planning consent, an early stage viability review will be triggered if an agreed level of progress on implementation of the development is not made within a specified time period. Thresholds are expected to be regularly reviewed by the London Plan, and may therefore change over the course of the plan period.
- 7.38. All development proposals will be expected to demonstrate that they have maximised the amount of genuinely affordable housing on-site in contributing to the delivery of the Borough’s affordable housing target. Applicants are encouraged to investigate realistic options to provide a further uplift of genuinely affordable housing (i.e. beyond that which can be viability delivered through development value alone) including through the use of public subsidy. This will require engagement with industry stakeholders, including Registered Providers, early in the development process to identify and capitalise on opportunities available. Where subsidy is secured, applications will be expected to clearly state the level of affordable housing that is to be provided using this subsidy. This clarification is required in order to assess schemes against the policy requirements, and for effective and transparent implementation of the threshold approach.
- 7.39. Proposals that do not provide the minimum required amount of genuinely affordable housing will be strongly resisted. Where applicants consider there are exceptional circumstances affecting the viability of a scheme and delivery of policy objectives, we will require that these are set out in a detailed Viability Assessment. This must be undertaken by a suitably qualified professional (such as one accredited by the Royal Institute of Chartered Surveyors) and will be made publicly available upon validation of the planning application. All such assessments will be considered having regard to higher level policies and associated guidance. This includes the NPPF and companion National Planning Practice Guidance on ‘Viability and decision taking’, the London Plan and Mayor’s Affordable Housing and Viability SPG (2017). A lower level of affordable housing will only be permissible where there are clear barriers to delivery and development is fully justified through detailed viability information. We may require that an independent appraisal of the Viability Assessment is undertaken, which will need to be paid for by the applicant.
- 7.40. Consistent with national planning policy, our expectation is that affordable housing will be delivered on-site. This is in order to promote inclusive and mixed

communities, as well as to help ensure that there is no undue delay to the delivery of affordable housing when it is included with proposals for market housing. However, there may be exceptional circumstances where it is appropriate to deliver affordable housing off-site, including through payment-in-lieu contributions. Applications will be required to provide robust justification for any off-site provision, having regard to the criteria in the policy. Viability alone will not be considered sufficient justification for off-site provision.

- 7.41. When off-site provision is acceptable in principle, we will expect all subject sites to be considered together for the purpose of calculating the level of affordable housing provision required. All off-site affordable housing must be provided within the Borough and be appropriately located, having regard to other policies that seek to provide residents with high quality living environments. Payment-in-lieu contributions may be accepted where there are demonstrable benefits in furthering affordable housing provision. Payments will be ring-fenced, and where appropriate pooled, to help maximise affordable housing delivery locally. Applicants should refer the Mayor's Affordable Housing and Viability SPG (2017), along with the council's Planning Obligations SPD for further guidance.
- 7.42. Viability 'review mechanisms' are reappraisal tools that can be used to ensure maximum public benefit is secured from development, including benefits associated with affordable housing delivery. Review mechanisms can be particularly important on phased schemes or schemes with longer build out periods, and are a useful way to respond to economic uncertainties that may arise over the lifetime of a development proposal. We will seek to apply viability review mechanisms as a standard practice, and implement them in line with the London Plan and its associated guidance. This will help to ensure that if there is an improvement in viability over lifetime of the development proposal, this contributes to the maximum amount of affordable housing provided. Further details on the implementation of this approach are set out in the Mayor's Affordable Housing and Viability SPG (2017).
- 7.43. The most pressing need in Lewisham is for new social homes with social rents. However there is also a need for affordable housing which is available to people who are unable to access social housing due to the rigorous eligibility criteria, but are also unable to afford private market housing. Therefore, where affordable housing is required on new development this should be provided on a tenure split basis of 70 per cent social rent or London Affordable Rent and 30 per cent London Living Rent or shared ownership. We support the use of London Living Rent, as by its nature, it is affordable to households earning the Lewisham median household income. Shared ownership products may also be an acceptable form of tenure, where the total monthly costs are demonstrably affordable.
- 7.44. In line with other Local Plan policies, all new affordable housing development must be of a high quality design and incorporate durable materials, adhering to the same space and amenity standards as market housing. To promote inclusive and mixed communities it is imperative that affordable housing is designed to be

'tenure blind', so that it is indistinguishable from other types of housing. Affordable housing must also be sensitively integrated into the site and its surroundings to ensure that all local residents, irrespective of tenure type, are provided with high quality living environments and are able to benefit from shared access to all on-site amenities.

#### Vacant Building Credit

- 7.45. Vacant Building Credit (VBC) was introduced by the Government, in 2014, as a way to incentivise development on brownfield sites. It is a material consideration in planning decisions. VBC applies to sites where a vacant building is brought back into lawful use, or is demolished to be replaced by a new building. Notably, VBC reduces the requirement for affordable housing contributions, taking into account the amount of vacant floorspace being brought back into use or redeveloped. This can have significant implications in the Borough where there is a demonstrated strategic need for affordable housing.
- 7.46. Application of the VBC is not considered appropriate in Lewisham. Monitoring indicates a strong rate of housing delivery locally, with the Borough exceeding its cumulative London Plan housing target since the adoption of the Core Strategy in 2011. Further, there is a pipeline of committed sites (with planning consent) and allocated future development sites, all of which are on brownfield land. Accordingly, brownfield sites are coming forward irrespective of the VBC and we do not consider that this additional incentive is necessary, particularly in an inner-London context where the relatively high land values help to support the viability of residential led schemes. Where proposals involve the use of VBC, evidence must be provided to demonstrate that there are exceptional circumstances in which to justify its application, having regard to the tests and requirements set out in this policy.
- 7.47. It should be noted that if an applicant is claiming that a scheme qualifies for VBC, it cannot also claim Community Infrastructure Levy relief through the vacancy test.

### HO 4 Housing estate maintenance, renewal and regeneration

- A. The maintenance, renewal and regeneration of Lewisham's housing estates will play an important role in helping to ensure that neighbourhoods benefit from high quality living environments, housing is maintained at a decent standard and new genuinely affordable housing is delivered locally.
- B. Where strategic housing estate renewal and regeneration is proposed this will be carried out in consultation with existing residents and the local community, in line with the London Mayor's Good Practice Guide to Estate Regeneration, in order to ensure:
- There is no net loss of affordable housing, and an uplift in genuinely affordable housing is delivered wherever possible;
  - A range of high quality, genuinely affordable housing options are made available in the Borough;

- c. Existing and new residential units achieve the Decent Homes standard;
- d. The development is designed to a high quality standard and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies; and
- e. Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration.

### **Explanation**

- 7.48. We are committed to ensuring that all Lewisham residents have access to a decent home that is secure and affordable. This will require that significantly more new genuinely affordable housing is made available in the Borough. Also, that existing residences are brought up to and maintained at an appropriate standard, particularly within Lewisham's housing estates. In addition, it is vital for the safety and security of residents and the wider community that homes are well integrated into their neighbourhoods, with plentiful opportunities for social interaction, and that high quality living environments benefit the health and well-being of local residents.
- 7.49. The Decent Homes programme provides one mechanism for housing improvement and has been successfully delivered across the Borough. However, funding is limited and this type of investment may not always be feasible or viable for some houses or estates. For example, the existing condition or orientation of buildings can act as a practical constraint to refurbishment works. Nonetheless the council has a strong record in this regard, and through Lewisham Homes, the proportion of residential units meeting the Decent Homes standard increased from 41 per cent to 94 per cent in the 10-year period from 2007.
- 7.50. Housing estates have been developed in the Borough over many decades. Their age and condition varies and therefore so too does the programme of maintenance required for each. Some older estates constrain opportunities for site or area wide improvements. For instance, their layout or design makes it difficult to introduce safer access points and through routes, more useable amenity space or public realm enhancements. In other circumstances, there may be options to deliver more affordable housing units on estates, either through incremental infill or comprehensive redevelopment. Accordingly, strategic approaches to estate renewal and regeneration may be necessary in certain circumstances.
- 7.51. The nature of the programme for housing estate maintenance, renewal and regeneration will vary on a case-by-case basis. This policy will help to ensure that that all such investment is appropriately managed, irrespective of the level of works involved, and that local residents ultimately benefit from improved access to high quality, inclusive and genuinely affordable housing and living environments.

7.52. All strategic estate renewal and regeneration schemes will be carried out in consultation with existing residents and the local community. The process will be in line with the London Mayor's Good Practice Guide to Estate Regeneration (2016) and the council's latest adopted Statement of Community Involvement. In line with [Policy HO 1 \(Meeting Lewisham's housing needs\)](#) all proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing. Loss of existing affordable housing will only be supported where it is replaced by equivalent or better quality accommodation, providing at least an equivalent level of affordable housing floorspace, on an identical or equivalent basis.<sup>19</sup> Floorspace is used as the measure for replacement provision as this provides flexibility for the council and its partners to better address acute housing needs, such as for more family sized social housing, where redevelopment is undertaken. This approach is consistent with that provided in the [draft London Plan](#).

## HO 5 High quality housing design

- A. High quality design is integral to ensuring housing that meets the diverse and changing needs of Lewisham residents over their lifetimes. All new housing development should provide adequately-sized rooms and spaces with comfortable and functional layouts along with well-integrated amenities. This includes proposals for new-build housing development, changes of use, alterations and extensions.
- B. Proposals for new housing development must meet, and wherever possible seek to exceed, the housing standards set out in the London Plan, including the minimum standards for:
  - a. Private internal space, having regard to:
    - i. Internal floor area and built-in storage area;
    - ii. Bedroom size;
    - iii. Ceiling height
  - b. Private outside space, having regard to:
    - i. Outside space adequate for the intended number of occupants;
    - ii. Minimum depth and width of balconies or other private outdoor spaces;
  - c. Communal amenity space; and
  - d. Children's play space, having regard to [Policy CI 3 \(Play and informal recreation\)](#).
- C. Development proposals for new housing must address the qualitative design aspects set out in [draft London Plan Policy D4 \(Housing quality and standards\)](#) and corresponding [Table 3.2](#), covering the detailed considerations for:
  - a. Layout, orientation and form;

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<sup>19</sup> Affordable housing floorspace must be replaced on an identical basis where a tenant has a right to return. Where there is no right of return affordable housing must be replaced on an identical or equivalent basis, i.e. social rented floorspace may be replaced with social rented floorspace or by general needs rented accommodation with rents at levels based on that which has been lost.

- b. Outside amenity space; and
  - c. Usability and ongoing maintenance.
- D. Housing development should be designed to be inclusive, accessible and safe to all, having regard to the requirements of **Policy QD2 (Inclusive and safe design)**.
- E. Housing development should protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with **Policy QD7 (Amenity)**.
- F. Housing development must be designed to be 'tenure blind' to ensure that houses across all tenures are indistinguishable from one another in terms of quality of design and materials, space standards, access and amenity provision.
- G. Housing development should maximise the provision of dual aspect dwellings. Proposals for single aspect dwellings will be resisted and should only be considered in exceptional circumstances, where it can be suitably demonstrated that it will provide for a more appropriate design solution than a dual aspect dwelling, having particular regard to:
- a. Building layout and orientation;
  - b. Outlook for occupiers;
  - c. Microclimate management including for heating, cooling and ventilation; and
  - d. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.

### Explanation

7.53. To be completed

## HO 6 Accommodation for older people

- A. The housing needs of older people will be met mainly through conventional residential accommodation that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime, whether through new build development or the appropriate retrofitting of existing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the varying requirements of Lewisham's older resident population.

### Specialist older person's accommodation

- B. Development proposals for specialist older person's accommodation will be supported where they address an unmet local housing need and:
- a. Positively respond to the objectives in Lewisham's Housing Strategy;
  - b. Make provision for a mix of tenure types including affordable housing, in line with **Policy HO3 (Genuinely affordable housing)**;

- c. Are sited at well-connected locations that are easily accessible to public transport, shops, services, leisure and community facilities appropriate to the intended occupiers;
  - d. Are designed to a high quality standard with fit for purpose accommodation and facilities suited to occupiers, staff and visitors, giving consideration to:
    - i. The level of independence of occupiers and corresponding level of managed care provision or support;
    - ii. Provision of accessible housing, in line with [Policy QD2 \(Inclusive and safe design\)](#);
    - iii. Private, communal and public amenity space; and
    - iv. Access and servicing arrangements, including for all types of vehicles expected to access the development.
- C. All proposals for specialist older person's accommodation must demonstrate that residents will be sufficiently supported by community infrastructure (such as health and leisure facilities) that is easily accessible from the site, taking into account the mobility requirements of the intended occupants, and can cope with new demand arising from the development.
- D. Development proposals resulting in the net loss of floorspace for specialist older person's accommodation will be resisted unless it can be demonstrated that:
  - a. There is a long-term surplus of the specific type of accommodation in Lewisham (i.e. there is no unmet local need); or
  - b. Adequate replacement provision will be provided, whether on-site or elsewhere within the Borough; and
  - c. The existing accommodation is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.
- E. Where the loss of specialist older person's accommodation is acceptable in line with (D) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including affordable housing, where appropriate.

#### Care home accommodation

- F. Development proposals for care home accommodation will be supported where they are appropriately located and designed to a high quality standard, having regard to the requirements of HO6.B(c-d) and HO6.C. In addition, proposals must ensure that 100 per cent of habitable rooms are wheelchair accessible.
- G. Development proposals resulting in the net loss of floorspace for care home accommodation will be assessed having regard to the requirements of HO6.D and HO6.E.
- H. In order to ensure inclusive and mixed communities, development proposals must not result in a harmful overconcentration of care home accommodation within the locality.

## Explanation

- 7.54. The number of older people in Lewisham is projected to increase significantly over the coming years. There was an estimated 40,400 people aged 65 and older in 2018 and this is projected to rise almost 50% in the next 15 years, up to 60,200 people by 2033<sup>20</sup>. This is largely driven by the increase in the population aged 60-74, although there is also expected to be significant gains in the proportion of those aged 80 and above. We are committed to ensuring that a wide range of high quality and affordable housing options are available to older people. This includes accommodation for those seeking to downsize from larger homes whilst remaining in the area, or people requiring more tailored, specialist accommodation with elements of support or care.
- 7.55. Current and future needs for older person's accommodation should be met principally through conventional housing. Where this is a good level of this type of provision available in the Borough, there will be less reliance on specialist forms of older person's accommodation. We will therefore expect that all new residential development in the C3 Use Class is designed to be adaptable to the varying needs of users at all stages of life, in line with [Policy QD 2 \(Inclusive and safe design\)](#). We will also encourage the retrofitting of existing residential buildings and units to better suit the day-to-date needs of older people, including by making them wheelchair adaptable or accessible. All proposals for retrofitting must ensure compliance with other Local Plan policies, particularly those on the historic environment. Internal or external alterations have the potential to harm the significance of heritage assets or otherwise impact on local character, and this should be considered early in the planning and design process.
- 7.56. The Lewisham SHMA (2019) indicates that there are a number of housing options available for older people in the Borough, including some 3,500 units of specialist accommodation with integrated elements of support or care. This provision is helping to meet the varying types of need, but it is recognised some additional capacity may need to come forward given the expected future growth in the Borough's older person population. The [draft London Plan](#) sets an indicative annual benchmark for the Borough of 100 units of specialist accommodation, and this should be considered in the context of more detailed local assessments of specific types of need.
- 7.57. We are broadly supportive of proposals for non-specialist forms of conventional housing in the C3 Use Class that are designed to be adaptable to the different needs of occupants over their lifetime, and therefore offer greater choice to older people. However, it is recognised that some people may choose or require specialist older person's accommodation. Proposals for such specialist accommodation will be supported where there is a demonstrable local need, having regard to the Lewisham SHMA (2019) and the council's Housing Strategy, and other policy requirements are satisfied.

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<sup>20</sup> Lewisham SHMA (2019)

- 7.58. The draft London Plan discusses the range of accommodation options that are available to older people. It clearly distinguishes between specialist older person's accommodation and care home accommodation. We will establish the nature of development proposals having regard to the definitions and attributes of specialist and care home accommodation set out in the draft London Plan, and consider proposals accordingly. For the avoidance of doubt, where the London draft Plan policy H13 (Specialist older persons housing) applies to a development proposal, then Local Plan policies H06 (B-E) will also apply.
- 7.59. Where a development does not meet the attributes of specialist older person's accommodation or care home accommodation set out in the London Plan, then the general housing policies in the London Plan and Local Plan will apply.
- 7.60. Specialist accommodation should provide for a range of tenure types, including affordable housing. The needs of older people vary depending on their personal financial circumstances. Furthermore, need varies based on an individual's level of independence and the support they require. This policy seeks to ensure provision for a wide range of housing products to meet the different needs of older people in the Borough.
- 7.61. In assessing proposals for specialist older person's accommodation and care home accommodation we will give consideration to affordability and financial support available to the intended occupant group. It is acknowledged that arrangements for assessing affordability to people of pensionable age will be different to people of working age, especially when housing includes an element of care.
- 7.62. Specialist older person's accommodation and care home accommodation must be sensitively integrated into Lewisham's neighbourhoods, at well-connected and accessible locations. Residents, carers and visitors should benefit from easy access to the site as well as the surrounding area. Accessibility is vital to ensuring schemes adequately respond to the mobility needs of occupiers. It is also important to promote independence and facilitate social interaction, which in turn can help to prevent against isolation and loneliness, a key public health issue.
- 7.63. For facilities to be easily accessible they should generally be located at a distance of no more than 400 metres away from public transport, shops, services and other community facilities. The locality should also feature accessible pathways and gradients, enabling residents to travel to and from the site with relative ease whether by walking or through the use of aids, such as wheelchairs or mobility scooters. One of our key objectives is to ensure that neighbourhoods are made more liveable and inclusive to all, including through the delivery of a high quality public realm. This policy will work in tandem with other Local Plan policies to positively address the needs of people at all stages of their life.
- 7.64. Specialist older person's accommodation and care home accommodation should be well integrated into the site and its wider surroundings, with careful

consideration given to layout and design. Where appropriate, proposals should promote and adequately respond to requirements for the sharing or joint use of facilities, particularly to encourage a sense of community belonging. Development should also be designed to ensure a good fit between the facilities supplied and the specialist needs of the intended occupants. This includes consideration for amenity space (private, communal and public), storage, charging of mobility scooters, as well as adequate access and parking for the vehicles expected at the site, such as taxis, mini-buses and ambulances.

- 7.65. Residential accommodation will be expected to meet the latest industry standards. We will require applicants to ensure development is informed by the latest good practice guidance. Planning statements should refer this guidance and clearly indicate how this has been taken into consideration.
- 7.66. We will seek to protect against the loss of floorspace for specialist older person's accommodation and care home accommodation. Proposals involving the loss of change of use of such housing must suitably demonstrate that there is not a long-term local need for the type of provision in question, or that adequate replacement provision will be provided within the Borough. Furthermore, there should be clear evidence that the existing facility is not suitable to support the intended occupants in its current condition and/or is incapable of being maintained at an acceptable modern standard.
- 7.67. When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies **HO 1 (Meeting Lewisham's housing needs)** and **HO 3 (Genuinely affordable housing)**, and any need to generate funding for replacement specialist accommodation elsewhere. If replacement housing is provided elsewhere we will consider the proportion of affordable housing provided across both sites. Proposals for redevelopment for non-residential uses will be resisted, and the council will seek to retain existing affordable housing, consistent with other Local Plan policies.

## **HO 7 Supported accommodation**

- A. Development proposals for supported accommodation (including residential hostels and secured accommodation) will be supported where they:
- a. Meet an identified need for the type of accommodation proposed;
  - b. Do not result in the net loss of existing permanent accommodation;
  - c. Make provision for a mix of tenure types including affordable housing, where appropriate, in line with **Policy HO3 (Genuinely affordable housing)**;
  - d. Contribute to mixed and balanced communities without leading to a proliferation or harmful overconcentration of this type of accommodation in the locality; and
  - e. Are appropriately located and designed giving consideration to:
    - i. Accessibility to public transport, services and community facilities;
    - ii. Intensity of use that is appropriate to the size of the development;

- iii. Accommodation and facilities that are suited to site occupiers and users, including arrangements for managed care or supervision, security and community safety; and
  - iv. Protection of the amenity of adjoining and neighbouring uses.
- B. Development proposals resulting in the net loss of floorspace for supported accommodation will be resisted unless it can be demonstrated that:
- a. The specific type of accommodation is no longer required for the particular group or other relevant groups in need of supported housing; or
  - b. Adequate replacement provision will be provided; and
  - c. The existing accommodation is not suitable for the support or care of the intended occupants in its current condition and format and/or is incapable of being maintained at an acceptable standard.
- C. Where the loss of accommodation is acceptable in line with (B) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

### **Explanation**

- 7.68. It is important that people from vulnerable groups are provided with access to accommodation, whether for temporary stays or longer-term periods. Supported and other forms of specialised accommodation offer respite and provision of care for individuals with distinct needs. This includes people coping with physical or mental health issues, disabilities, impairments and other vulnerabilities, or those who are in transition and require support, such as refugees. Supported accommodation can take a variety of forms and fall into different Use Classes, depending on the nature of use and type of care or supervision required.
- 7.69. In line with Local Plan objectives to deliver inclusive communities, we are generally encouraging of supported housing where it clearly addresses an identified need, is well designed and sensitively integrated into the locality. It is vital that development is appropriate to the intended end users, so that the specific type of managed care or supervision required can be effectively delivered. Applicants are encouraged to design schemes through active engagement with relevant health and social care stakeholders, wherever possible. In order to contribute to the achievement of mixed and balanced communities, proposals should not result in an overconcentration of uses, particularly where this would adversely impact on amenity, community safety or local character.
- 7.70. Existing supported housing should be protected where it is in a suitable condition and need exists, whether for the specific group it is currently serving or other vulnerable groups. Need should be considered at both the local and sub-regional level, recognising that delivery of provision may require coordination of stakeholders across Lewisham and its neighbouring authorities. Proposals involving the loss of change of use of supported accommodation must sufficiently demonstrate that the existing provision is no longer required or that adequate

replacement provision will be secured. Furthermore, there should be clear evidence that the existing facility is not suitable to support the intended occupants in its current condition or is incapable of being maintained at an acceptable modern standard.

- 7.71. Where it is accepted that an existing site or property is no longer appropriate for supported accommodation, we will seek to ensure that there is no net loss of residential floorspace. When considering redevelopment for self-contained housing, we will have regard to the criteria set out in Policies [HO1 \(Meeting Lewisham's housing needs\)](#) and [HO3 \(Genuinely affordable housing\)](#). Proposals for redevelopment for non-residential uses will be resisted, and the council will seek to retain existing affordable housing, consistent with other Local Plan policies.

## HO 8 Purpose built student accommodation

- A. Development proposals for Purpose Built Student Accommodation (PBSA) will only be supported where they:
- Help to meet an identified strategic need for this type of housing, giving priority to local need;
  - Ensure that the accommodation is secured for use by students, as demonstrated by an agreement with one or more specific higher education institutions;
  - Make provision for affordable student accommodation, in line with [draft London Plan Policy H17 \(Purpose built student accommodation\)](#); and
  - Do not compromise the delivery of the Borough's strategic requirements for conventional housing.
- B. Development proposals for PBSA must be appropriately located:
- At well-connected sites that have good levels of public transport accessibility and are easy to access by walking and cycling;
  - Within or at the edge of town centres, or other locations that benefit from good provision of shops, services, leisure and community facilities appropriate to the student population; and
  - To support mixed and balanced communities:
    - Without leading to a proliferation or harmful overconcentration of student accommodation in the locality; and
    - Giving priority to sites located in proximity to the education institution(s) the development is intended to serve, or other higher education institutions in the Borough.
- C. Development proposals for PBSA should be well-designed, sensitively integrated into the locality and ensure a high standard of amenity for student occupiers. All proposals will be expected to ensure:
- A high quality living environment with a functional layout, good-sized rooms and well integrated communal areas and facilities;

- b. Provision for wheelchair accessible accommodation, spaces and facilities, in line with **Policy QD2 (Inclusive and safe design)**;
  - c. Amenity considerations are integral to the design-led process (including for outlook, daylight and sunlight, noise impacts and ventilation);
  - d. Adequate on-site cycle parking facilities;
  - e. The accommodation is suitable for year-round occupation; and
  - f. Protection of the amenity of adjoining and neighbouring uses.
- D. All development proposals for PBSA must be accompanied by a site management and maintenance plan, to be secured by planning condition.
- E. The loss of existing Purpose Built Student Accommodation will be resisted unless it can be suitably demonstrated that:
- a. There is no local demand for student accommodation to serve the existing or another higher education institution; or
  - b. Adequate replacement accommodation can be provided in an appropriate location accessible to the higher education institution it serves.
- F. Where the loss of accommodation is acceptable in line with (E) above, development proposals will be expected to secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

### **Explanation**

- 7.72. High quality and affordable Purpose Built Student Accommodation (PBSA) is necessary to cater for the needs of London's student population. The majority of the Capital's existing PBSA is concentrated in central London, especially in the Boroughs of Camden, Islington, Tower Hamlets and Southwark. In order to improve access and prevent against the overconcentration of this type of use, the **draft** London Plan seeks to redress the distribution of provision across the region.
- 7.73. Whilst recognising there are student accommodation needs associated with education providers throughout London, we will aim to address local needs as a priority. Lewisham is home to a number of further and higher education institutions. This includes Goldsmiths College at New Cross, Trinity Laban Conservatory of Music and Dance at Deptford, and Lewisham College at Deptford Bridge and Lewisham Way. Greenwich University in the Royal Borough of Greenwich is also located nearby. It is important that Lewisham's student population is able to access affordable accommodation, ideally in proximity to the places where people take up studies. Furthermore, provision of PBSA has the added benefit of relieving pressure on the private rented market, enabling opportunities for others to access housing that might not otherwise be available.
- 7.74. We will take a positive view on proposals for new PBSA where there is an identified local or strategic need for this type of accommodation, and there are assurances that the development will be secured for student use. This general support is provided recognising that the Borough's main strategic requirement is

for genuinely affordable, conventional housing. PBSA is defined as non-conventional housing, which for purposes of delivery against the Borough's strategic housing target, is counted on a 2.5:1 basis (i.e. two and a half bedrooms/units is equivalent to one unit of housing). Compared with conventional housing, where units are counted on a 1:1 basis, student accommodation may not always provide the most optimal use of land. We will resist proposals where it is considered that student accommodation will compromise or suppress delivery of conventional housing, for which need is greatest locally. This includes consideration of proposals for PBSA that would result in the net loss of existing housing units.

- 7.75. New PBSA must be developed and secured for occupation by students of one or more specific higher education institutions. This is to guard against speculative development and ensure proposals genuinely help to address identified need. Applications must provide evidence of an end user affiliated with an educational institution, and demonstrate appropriate management arrangements are in place so that rooms will be rented solely to students over the lifetime of the development, including an identified landlord, agent or management company. Consistent with the [draft London Plan Policy H17](#), if the accommodation is not secured for use by students and for occupation by members of one or more specified higher educational institutions, development is not considered PBSA and will be considered against policies on shared housing and communal living, including [HO8 \(Housing with shared facilities\)](#).
- 7.76. [Draft London Plan Policy H17](#) provides that at least 35% of PBSA should be secured as affordable housing. This is in order to ensure that students with an income equivalent to that provided to full-time UK students by state funded sources of financial support for living costs can afford to stay in PBSA. We will apply the definition of affordable student accommodation as set in the [draft](#) London Plan and its supplementary guidance. Affordable rent levels may be subject to periodic review over the life of the Local Plan, taking into account any significant changes that may be made to the Government's student maintenance loan regime.
- 7.77. New PBSA should be directed to well-connected and highly accessible locations, including those supported by good walking and cycling infrastructure. It is also important that PBSA is sited so student residents have access to a wide range of services and facilities. During the site selection process applicants should give priority to locations in proximity to the institutions that the development will serve. PBSA that is intended to meet need arising from outside of the Borough should be sufficiently justified in respect of the site location, both locally and in the individual site context.
- 7.78. New PBSA must be of a high standard of design and construction, with functional layouts and well integrated living and communal spaces and facilities. It should meet the latest industry standards as demonstrated through the use of Accreditation Network UK or other similar scheme. Student unit sizes and layouts should be varied, particularly to cater to the needs of wheelchair users, mature

students with families, students who want to live alone and for groups of students using shared facilities. The specific requirements of educational institutions should be considered and accounted for wherever possible.

- 7.79. Whilst many students require accommodation during term time only, some residents will use accommodation as their permanent address and development therefore should allow for year round occupation. To help ensure the viability of PBSA, we will provide flexibility to allow for the temporary or ancillary use of accommodation during vacation periods or term breaks. Proposals will be considered on a case-by-case basis, and where acceptable in principle, we will use conditions or legal agreements to ensure that any temporary or ancillary uses do not result in a material change of use of the building.
- 7.80. PBSA can benefit Lewisham's communities, for example, by attracting a student population that supports the local economy, complements the creative and cultural industries and stimulates inward investment. However an overconcentration of student accommodation within a local area can adversely impact on the amenity of existing residents and uses, and also undermine objectives for delivering mixed and balanced communities. Where the scale or concentration of student housing is likely to harm local amenity, we will resist proposals or seek a range of mitigation measures to ensure development is appropriate. This may include planning contributions for any additional infrastructure provision required to support the development.
- 7.81. Site management and maintenance plans are important to delivering successful student housing schemes. These plans will be required for all new PBSA and will normally be secured as a planning condition. Management plans will be expected to cover matters such as site management and maintenance, on-site wardens, communal facilities, safety and security for occupants and elimination of potential noise nuisance.
- 7.82. We will seek to protect against the loss of existing student accommodation. This is particularly to ensure that such loss does not adversely impact on existing capacity or existing residents, whose displacement could create additional pressure on the conventional housing market. However, flexibility will be applied where it can be suitably demonstrated that demand for the provision in question no longer exists. We will encourage the refurbishment of buildings to ensure student accommodation is brought up to an acceptable modern standard. Proposals will be supported where there is adequate re-provision of accommodation and other policy requirements are satisfied.

## HO 9 Housing with shared facilities (Houses in Multiple Occupation)

- A. Development proposals for new housing with shared facilities (i.e. Houses in Multiple Occupation) (HMOs) in the Sui Generis Use Class will only be supported where they contribute to a beneficial mix and balance of uses within an area and:
- a. Do not result in the loss of existing larger housing suitable for family occupation;

- b. Do not result in an overconcentration of HMOs in the area;
  - c. Do not give rise to adverse impacts on the amenity of the surrounding properties and neighbourhood, including cumulative impacts taking account of other HMOs in the area;
  - d. Are appropriately located in areas of good transport accessibility; and
  - e. Are well-designed and provide high quality accommodation that satisfies the relevant standards for HMOs along with other Local Plan policies, including for internal space standards and amenity space provision.
- B. Development proposals for small HMOs in the C4 Use Class (i.e. 3 to 6 unrelated people) within any area covered by an Article 4 Direction will only be permitted where they contribute to a beneficial mix and balance of uses within an area and:
- a. The gross original internal floorspace of the existing dwelling is 130 sq. metres or greater; and
  - b. The requirements of (A)(b-e) above are satisfied.
- C. Development proposals that result in the loss of an HMO, or the self-containment of any part of an HMO, will be resisted unless it can be suitably demonstrated that:
- a. The existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; and
  - b. Adequate replacement provision can be secured within the Borough, having regard to the requirements of (A) above, with no net loss in HMO floorspace; or
  - c. Any replacement use includes an element of residential provision that meets an acute local housing need, particularly genuinely affordable housing, with at least the equivalent amount of residential floorspace re-provided.

#### Large-scale purpose built shared living accommodation

- D. Large-scale purpose-built shared living accommodation in the Sui Generis Use Class will generally be resisted as this type of use compromises opportunities to deliver conventional housing in the Borough. Development proposals will only be permitted where it is suitably demonstrated that:
- a. They meet an identified local need for the type of housing proposed;
  - b. Private residential units within the development are demonstrably not accommodation in the C3 Use Class;
  - c. There is adequate provision of communal facilities and services suited to the intended occupiers;
  - d. They are appropriately located and designed to a high quality standard, having regard to the requirements of (A) above;
  - e. The development will be suitably managed and maintained over its lifetime, as evidenced by a management plan;
  - f. Minimum tenancy lengths are available to occupants; and
  - g. A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class.

#### **Explanation**

- 7.83. A house with shared facilities, or House in Multiple Occupation (HMO), refers to a shared house, flat or other non-self-contained dwelling that is the main residence for 3 or more occupiers forming 2 or more households. A household is generally a family (or people with relationships similar to a family), including single persons and co-habiting couples. There are two planning Use Classes for housing with shared facilities. A Use Class C4 HMO is a 'small' HMO used by 3 to 6 unrelated people. A 'large' HMO shared by more than 6 unrelated people is a Sui Generis use.<sup>21</sup>
- 7.84. It is permitted to change a Use Class C4 HMO property to a Use Class C3 dwelling house without planning consent, and vice versa. Therefore, for planning policy implementation we will generally treat small HMOs in the same way as self-contained homes, with legislation controlling changes of use between these Use Classes. Exceptions apply in situations where an Article 4 Direction covers a specified area.
- 7.85. Planning permission is required for the use of land and buildings for large HMOs in the Sui Generis Use Class. Some forms of housing with shared facilities are not considered HMOs in planning terms (for example, Purpose Built Student Accommodation and supported housing) and these are addressed elsewhere in the Local Plan.
- 7.86. The London Plan acknowledges the role that HMOs play in London as a strategically important part of the Capital's housing supply, with provision that helps to meet distinct needs and reduces pressure on other elements of the housing stock. In Lewisham, HMOs have contributed to making available a wider range of housing options over time. This is especially for low income residents and young people (including those under 35 years of age in receipt of the shared room rate housing benefit) and those requiring temporary accommodation.
- 7.87. To ensure that HMOs are built and maintained at an acceptable standard the council operates mandatory and additional licencing schemes, in accordance with housing legislation. Through this regime we have published the Lewisham Standards for Licensable HMOs. All development proposals for new HMOs will be expected to ensure these standards are met as a minimum, irrespective of associated licencing requirements. The standards should be considered alongside other planning policies to ensure that new housing is fit for purpose.
- 7.88. Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness. For these reasons the loss of good quality shared living accommodation will be resisted, including where loss occurs through the self-containment of parts or all of

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<sup>21</sup> The above provides a summary of HMOs and the full legal definitions should be referred as appropriate, as set out in the Town and Country Planning (Use Classes) Order 1987 (as amended). There are separate definitions in respect of the legal licencing of HMOs as set out in the Housing Act 2004 and related secondary legislation.

buildings. We will seek to protect HMOs where there is good reason to believe they could be improved to a decent standard.

- 7.89. Consideration will be given to changes of use of existing HMOs where it is suitably demonstrated that the building does not meet local and other relevant standards, as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) 2006), and has no realistic prospect of meeting these. The council's Environmental Health team will be consulted on a case-by-case basis to assist in determining the condition of the accommodation and whether it can be maintained at an acceptable standard. Where change of use or re-development is acceptable in principle, we will seek appropriate re-provision of residential floorspace giving priority to HMO or other accommodation to meet priority needs in the Borough, including genuinely affordable housing.
- 7.90. New HMOs should contribute positively to their localities by supporting the delivery of mixed and balanced communities. Proposals must demonstrate that the development will not result in a proliferation or harmful overconcentration of HMOs in the local area. This is to ensure an appropriate distribution of different types of housing provision across the Borough, along with the protection of amenity of immediate and neighbouring properties. Furthermore, as with other forms of higher density development, housing with shared facilities should be sustainably located in areas with good public transport accessibility levels (PTAL 3 or higher) and within easy access to facilities and services.
- 7.91. To help inform preparation of the Local Plan a review of HMO accommodation in Lewisham was undertaken.<sup>22</sup> The review considered various data sources and concluded that while the Borough has not experienced a significant increase of HMOs in recent years, that there has been a notable change in the spatial distribution of HMOs. Specifically, the review identified a substantial increase and clustering of HMOs in Lewisham's southern wards, which have traditionally exhibited the lowest presence of this type of provision. As a result of these findings the council has implemented a non-immediate Article 4 Direction, coming into force in March 2020, which will remove the Permitted Development rights for the conversion of single dwellings into small HMOs (3-6 bedrooms) within the wards Bellingham, Whitefoot, Downham and Grove Park. Proposals for new small HMOs in these wards will be considered against Part (B) of the policy.

#### Large-scale purpose built shared living accommodation

- 7.92. London has very recently experienced a rise in development of large-scale purpose-built shared living accommodation, including co-living schemes. These products are similar in format and layout to student housing but tend to include a bespoke range of facilities, services and communal spaces tailored to a wider range of occupants, such as young professionals. The draft London Plan defines this type of provision as a shared living accommodation generally comprising of 50 units or more. However, in Lewisham this will be considered on a case-by-

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<sup>22</sup> Lewisham HMO Review and Evidence Paper Update (2018)

case basis, with the London Plan and relevant Local Plan policies applying on developments of 20 or more units as a general guideline. This is owing to the significant variances in the character, urban structure and mix of uses across the Borough, and the need to ensure development of this scale is appropriate to its location.

- 7.93. Whilst recognising that housing with shared facilities contributes to meeting housing need, our priority is to secure provision of genuinely affordable self-contained housing, including for families, as set out in [Policy HO 1 \(Meeting Lewisham's housing needs\)](#). We will therefore resist proposals for large-scale purpose built shared living in order to ensure new development optimises the use of land for conventional housing, particularly on larger sites that have capacity to accommodate major development.
- 7.94. Consistent with [draft](#) London Plan Policy H18, we will only support proposals for large-scale purpose-built shared living accommodation where there is an identified local need for such provision. Applications will be required to provide sufficient justification for accommodation of this type and demonstrate there is a clear local market need for it. This is to ensure that development does not compromise opportunities for more conventional forms of self-contained housing to be delivered on larger sites, and to prevent against speculative development which does not adequately respond to local need.
- 7.95. It is imperative that large-scale shared accommodation is appropriately designed and managed, so to meet the specific housing need it is intended for. This includes provision of high quality living spaces that comply with the Local Plan requirements, including [Policies QD 2 \(Inclusive and safe design\)](#) and [QD 8 \(Residential design and density\)](#), meet Environmental Health and Fire Safety standards, and make adequate provision of communal space and facilities. In addition, all proposals must be accompanied by a management plan covering matters such as site management and maintenance, communal facilities, safety and security for occupants, and mitigation of potential noise or other nuisance.
- 7.96. Where proposals are acceptable in principle, we will require that minimum tenancy lengths are available to occupants. This is necessary to ensure that the development meets a specified need and is retained as shared accommodation over its lifetime. We will seek to prevent against future material changes of use where development effectively reverts to other forms of specialist accommodation, such as large scale hostels, which are not considered appropriate in the Borough.
- 7.97. Given their nature and scale, proposals for large-scale purpose built accommodation will be expected to contribute to the delivery of affordable housing, in line with the [draft](#) London Plan. However, because development is not in the C3 Use Class and does not meet minimum space standards for conventional housing, and generally consists of bedrooms rather than housing units, it is not considered as a suitable form of affordable housing in itself. Off-site planning contributions will be required, to be secured on a case-by-case basis

having regard to viability, in accordance with the level of contributions sought by the London Plan.

## MAP – NON-IMMEDIATE A4D AREA

### HO 10 Self-build and custom-build housing

- A. The council will seek to identify sites to help meet identified need for, and facilitate development of, self-build and custom-build housing particularly where this will improve access to affordable housing for local residents.
- B. Development proposals for self-build or custom-build housing will be supported where a local need for this type of provision is clearly established and they:
  - a. Make the optimal use of land for residential development in contributing to the delivery of the Borough's strategic housing target, with a density level that is appropriate to the site having regard to [Policy QD 8 \(Residential design and density\)](#);
  - b. Make provision for affordable housing in line with [Policy HO 3 \(Genuinely affordable housing\)](#);
  - c. Are appropriately located, designed to a high quality standard (including sustainable design principles), integrate adequate amenity space and make a positive contribution to the neighbourhood in which they are situated, consistent with other Local Plan policies.
- C. Proposals for self-build or custom-build housing should demonstrate how the designed process has informed the development, and clearly identify whether there are any elements of that may be change or become adapted owing to the unique nature of the design and construction process.

#### Explanation

- 7.98. Self-build and custom-build housing is housing that is built or commissioned by individuals, or associations of individuals, for their own occupation. This type of development can provide a more affordable route to home ownership than other options available, such as 'built for sale' market housing. Self-build generally refers to people who apply their own skills in the design and construction process, whereas custom-build involves the outsourcing of industry professionals, often for bespoke or innovate schemes. Self-build and custom build housing units provide an additional source of supply of conventional housing and a further housing choice, and will therefore be considered as housing in the C3 Use Class for policy implementation.
- 7.99. The council has a statutory duty to maintain a register for self-build and custom-build housing and have regard to this register in its planning, housing and related functions. The register forms part of the evidence base informing Local Plan preparation. It provides an indication of demand for serviced plots for self-build and custom-build housing from individuals or groups who meet specific eligibility

considerations. The Lewisham SHMA (2019) has also considered demand for this type of provision. This research indicates that whilst there is some interest locally it comprises a small proportion of Lewisham's overall housing need. In addition, more than one-third of applicants on the local register have also expressed an interest in the Greater London Authority register, and it is therefore not clear whether demand is exclusively for Lewisham or elsewhere. Given the Borough's heavily urbanised inner-London context, where there is a limited (and often constrained) supply of land to meet the needs of a growing population, there will be few opportunities for people to acquire appropriately located sites to build their own homes. This is particularly given that all applicants on the local register have expressed a preference for plots located in 'town centres', where sites will need to be optimised through higher-density development, in line with the spatial strategy for the Borough. Local land values may also prohibit the viability of such development.

- 7.100. Nonetheless, the council is broadly supportive of self-build and custom-build housing. For example, we have recently collaborated with a local community organisation, making available land to enable a new self-build development of 33 residential units in the Ladywell area, at a site known as Church Grove. The development is supported by an innovative Community Land Trust structure that will ensure the new homes are affordable in relation to local incomes over the long-term. This development demonstrates our commitment to seek to meet demand within the Borough, and we will continue to monitor Lewisham's register in line with the relevant statutory requirements.
- 7.101. Proposals for self-build and custom-build housing will be supported where they positively respond to the locality and support delivery of the spatial strategy for the Borough. All proposals must be designed to a high quality standard and make provision for an element of affordable housing, where appropriate. Given Lewisham's challenging future requirement for conventional housing it is imperative that all development, including self-build and custom build housing, optimises the use of sites including through densities that are appropriate to the site location.
- 7.102. Proposals for self-build or custom-build housing should clearly demonstrate how the design-led process has informed the development, in line with [Policy QD1 \(Delivering high quality design in Lewisham\)](#). It is recognised that some flexibility in terms of design and construction may be necessary owing to the unique nature of the self-build or custom-building process. Proposals should therefore clearly articulate at the planning application stage which elements of the development and building are set or fixed, and where there may be need to be scope for some flexibility during the construction process. We will work positively with applicants however recognising the need to ensure that all such development is carried out in line with the planning consent.

## HO 11 Gypsy and traveller accommodation

- A. The council will assess the accommodation needs of Lewisham's gypsy and traveller community. Where there is a demonstrated local need for this type of provision, it will be addressed in a Gypsy and Traveller Site Local Plan and/or through a future review of the Local Plan and associated site allocation policies.
- B. All proposals for gypsy and traveller accommodation, including the development of new sites and pitches, must meet the following requirements:
  - a. Suitable provision of basic amenities including for water, sewerage/drainage, energy and waste management;
  - b. Safe and reasonably convenient access to and from the main road network;
  - c. Acceptable arrangements for all vehicles likely to use the site, including emergency service vehicles (giving consideration to access, parking, turning and service requirements);
  - d. Reasonable access to local shops, services and community facilities having particular regard to education and health services;
  - e. The provision is well integrated into the locality with a satisfactory layout and standard of facilities, including pitches, hardstanding, amenity blocks, open space and play areas; and
  - f. Development must not result in unacceptable adverse impacts on the safety and amenity of site occupants and neighbouring properties.

### Explanation

- 7.103. The National Planning Policy for Traveller Sites (2015), which sits alongside the NPPF, sets out the Government's aim to ensure fair and equal treatment for travellers, in a way that facilitates their traditional and nomadic way of life of while respecting the interests of the settled community.
- 7.104. Travellers are part of the diverse community in Lewisham. In line with the National Planning Policy for Traveller Sites, the council has undertaken an assessment to understand requirements of Lewisham's gypsy and traveller population. The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for 6 pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation.
- 7.105. Having regard to this assessment, the council has commenced preparation of a Gypsy and Traveller Site Local Plan. This will set out the approach to meeting identified local need for this group, including through site allocation policies. A Preferred Site Consultation Report was published for a Regulation 18 stage consultation. This ran for a six-week period from 10<sup>th</sup> September 2018. Consultation responses are currently being considered to inform the next stages of plan preparation and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed.

7.106. The council is committed to ensuring suitable provision to meet identified need through the preparation of the Gypsy and Traveller Site Local Plan. In the interim period (i.e. in advance of the adoption of that plan) all proposals for new sites, pitches and/or plots will be assessed against the windfall development policy criteria set out in **HO 11.B** above. The policy will also apply to any future proposals to address any identified additional need arising over the plan period that cannot be accommodated within adopted site allocations, and in advance of a Local Plan review.

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## 8 Economy and culture

### EC 1 A thriving and inclusive local economy

- A. Everyone should have access to high quality education, training and job opportunities. The council will help to build a thriving and inclusive local economy by attracting and generating inward investment, including by:
- a. Promoting and strengthening Lewisham's role in the London economy, including by supporting sectors of local importance, such as the cultural, creative and digital industries;
  - b. Working with stakeholders to deliver strategic infrastructure (including transport, digital and communications infrastructure) that better enables residents and businesses to access economic opportunities across the Borough and further afield;
  - c. Safeguarding and making provision for vibrant and attractive employment locations, including town centres, that accommodate a wide range of uses and workspaces which are well-suited to the needs of modern business;
  - d. Ensuring new employment development is designed to a high quality standard and contributes to integrated place making;
  - e. Securing lower-cost and affordable workspace, and coordinating with specialist providers to ensure this is appropriately managed; and
  - f. Providing residents with good access to high quality education, skills and employment training opportunities.

#### Cultural and creative industries

- B. The cultural and creative industries (including education and training facilities that support and are associated with these industries) contribute to the diversity and distinctiveness of Lewisham's neighbourhoods and play an important role in the local economy. Development proposals should help facilitate the continued growth and development of these industries by:
- a. Protecting existing cultural venues and uses, including by having regard to policy QD7 (Amenity and agent of change);
  - b. Making provision for new cultural venues, workspace and performance space in town centres and other appropriate locations, particularly in major development proposals and large-scale regeneration schemes;
  - c. Designing public realm with spaces that can be adapted to support civic and cultural events, including outdoors, in line with Policy QD3 (Public realm and connecting places);
  - d. Considering the use of vacant properties and land for temporary pop-up or meanwhile uses for cultural and creative activities, having regard to Policy EC 22 (Meanwhile uses); and
  - e. Facilitating the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital and communications infrastructure and connectivity).

- C. The Lewisham North Creative Enterprise Zone (CEZ) is designated in the Local Plan. Development proposals will be expected to support and, where appropriate, contribute to enhancing the cultural and creative industries within the CEZ, in line with [Policy LNA3 \(Lewisham North Creative Enterprise Zone\)](#).

### **Explanation**

- 8.1. Helping to facilitate a thriving, diverse and inclusive local economy is one of our key priorities. This means growing and strengthening the local economic base, making available a wide range of job opportunities, workspaces and employment sites across the Borough. By delivering this provision it will be easier to attract different types of industries and employers to the Borough, whilst also ensuring local businesses have space to start-up, grow and prosper. This is particularly important for businesses in those sectors where Lewisham can perform a niche role in the wider London economy. These includes the cultural, creative and digital industries, for example, whose presence in the Deptford and New Cross areas has enabled the Borough to be designated by the London Mayor as one of London's first Creative Enterprise Zones (CEZ), known as SHAPESLewisham. The Local Plan helps to embed that designation in planning policy and establishes the extent of the CEZ area.
- 8.2. Equally, we are committed to tackling inequalities by ensuring residents have access to good quality job opportunities along with education, skills and training. It is recognised that many people take up work or training outside of the Borough, taking advantage Lewisham's good transport links to the rest of London and beyond. However, securing a wide range of local provision is vital to creating a more inclusive economy and giving residents greater choice in accessing opportunities closer to where they live. This policy sets out our overall approach to facilitate development in a way that allows everyone to share in Lewisham's economic prosperity.
- 8.3. Economic development should not be considered in isolation of sustainable neighbourhood development. Where proposals involve the creation of new workspace, this should be designed to a high quality standard, having regard to the character and function of the immediate and surrounding area. All new development must be compatible with its neighbouring uses. It should also deliver high quality public realm that improves the liveability of neighbourhoods, whilst also reinforcing and enhancing people's sense of place.

## **EC 2 Protecting employment sites and delivering new workspace**

- A. Employment sites and floorspace in Lewisham's employment land hierarchy (as set out in [Table X](#) below) will be safeguarded for commercial and industrial uses. Proposals for new development should be commensurate with the type and function of land and sites within this hierarchy.
- B. There is a forecast need for 21,800 square metres of net additional employment floorspace (Use Class B1) in the Borough up to 2038. This need will be met by:

- a. Within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), retaining industrial capacity (ensuring no net loss of floorspace capacity and operational yard space capacity) along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process;
- b. Facilitating the delivery of new modern workspace through the comprehensive regeneration of Mixed-use Employment Locations (MEL);
- c. Maximising opportunities for new and enhanced employment provision, including through mixed-use development in town and edge-of-centre locations and non-designated employment sites;
- d. Resisting the redevelopment of employment land and sites where proposals consist solely or predominantly of storage and warehousing uses; and
- e. Refusing development proposals that would result in a net loss of viable employment land and floorspace, having regard to other Local Plan policies.

#### Strategic Industrial Locations

- C. Development proposals on sites within Strategic Industrial Locations must not adversely impact on the functional integrity of the SIL or prejudice the continued operation of commercial and industrial uses on the site or within the employment area.
- D. Proposals for the co-location of employment and other compatible uses will only be supported at selected SIL sites, and where it can be suitably demonstrated that the requirements of **draft London Plan** policies **E5 (Strategic Industrial Locations)** and **E7 (Industrial intensification, co-location and substitution)**, and other relevant Local Plan policies, are satisfied. Further detailed requirements are set out in the corresponding site allocation policies for the following sites:
  - a. Apollo Business Centre (Surrey Canal Road SIL)
  - b. Trundleys Road (Surrey Canal Road SIL)
  - c. Evelyn Court (Surrey Canal Road SIL)
  - d.

Lewisham's Employment Land Hierarchy			
Type	Ref	Location	Function
Strategic Industrial Location	SIL	Bromley Road  Surrey Canal Road (including Bermondsey Dive Under - <b>new</b> )	London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of the regional economy. Protected for a wide range of commercial, industrial and related uses, in accordance with the London Plan.
Locally Significant Industrial Site	LSIS	Blackheath Hill Childers Street West Clyde Vale Endwell Road	Lewisham's main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-

		Evelyn Street Lower Creekside Malham Road - (with 118 Stansted Road) Manor Lane Molesworth Street Perry Vale Stanton Square Willow Way Worsley Bridge Road	regional and local economy. They provide workspace for micro, small and medium sized businesses, including in the cultural, creative and digital industries. Protected for commercial and industrial uses, with priority given to Class B1 commercial and light industrial uses.
Mixed-use Employment Location	MEL	Arklow Road Childers Street East Convoys Wharf Grinstead Road Oxestalls Road Plough Way Sun and Kent Wharf Surrey Canal Triangle	Larger redundant and/or underused industrial sites where plan-led, mixed-use redevelopment is permitted to support strategic regeneration objectives in Lewisham. New, modern workspace delivered through redevelopment is protected.
Non-designated employment site	Not Applicable	Dispersed throughout Borough	Smaller commercial and industrial sites scattered across Lewisham, mainly serving local economic catchments, which collectively form an important component of the Borough's industrial land capacity.

### Explanation

- 8.4. This policy establishes Lewisham's employment land hierarchy, which comprises the different types of employment land and sites in the Borough. The safeguarding of sites within this hierarchy is necessary to ensure a sufficient supply of land to meet the Borough's current and future needs for employment floorspace. The hierarchy is reflected by the land-use designations on the Policies Map. These update the former Core Strategy (2011) designations, taking into account the latest technical evidence, including Lewisham's Employment Land Study (2019).
- 8.5. Designated employment locations include regionally Strategic Industrial Locations (SIL), as set by in the London Plan, and several types of locally strategic sites. Designated local sites include Locally Significant Industrial Sites (LSIS), formerly referred to as Local Employment Land, and Mixed-use Employment Locations (MEL). The successful delivery of the spatial strategy for the Borough is dependent on new employment development being directed to these locations, along with town centres, with the type and nature of uses being commensurate with the site's place in the hierarchy. Further detailed policies for the different types of employment land are set out later in this section.
- 8.6. Lewisham has a small amount of employment land when compared to other London Boroughs, including in the sub-regional context. Notably, the council's Authority Monitoring Reports indicate significant losses of employment land and

floorspace in recent years. Some of this can be attributed to plan-led consolidation and release of land to support strategic regeneration objectives, particularly through mixed-use redevelopment of MEL sites in the north of the Borough. However, beyond this plan-led process the Borough's other employment sites and premises are facing increased pressure for redevelopment from other higher value land uses, particularly housing. This pressure has been amplified by the introduction of planning legislation, for example, new permitted development rights enabling the conversion of offices and warehouses to residential uses through the Prior Approval process.

- 8.7. In the light of these cumulative losses of employment land and floorspace, the **draft London Plan** now provides that Lewisham must seek to retain its existing industrial capacity. In order to meet the Borough's future employment and related floorspace requirements it will be necessary to not only safeguard both designated and non-designated employment sites but to intensify employment uses on them. The Local Plan therefore seeks to facilitate a restructuring of the employment land stock, with policy interventions aimed at increasing employment densities and realising an uplift in employment floorspace and local jobs across the Borough.
- 8.8. The **draft London Plan** provides the strategic framework for industrial land management across the region. It provides in-principle support for the co-location of employment and other compatible uses on Strategic Industrial Land and Locally Significant Industrial Sites where this is facilitated through the plan-led process. Informed by findings of the Lewisham Employment Land Study (2019), the Local Plan helps give effect to London Plan policies **E5 (Strategic Industrial Locations)** and **E7 (Industrial intensification, co-location and substitution)**. To secure the long-term viability of employment floorspace and to help facilitate the renewal of SIL and LSIS land, we will support proposals for the co-location of employment and other compatible uses on selected sites at the Surrey Canal Road SIL, as identified in **Policy EC2.C** above and within LSIS, as set out in **Policy EC5 (Locally Significant Industrial Sites)**. Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the masterplan process.
- 8.9. Our expectation is that there will be no net loss of industrial capacity in the borough, and that net gains are delivered wherever possible. Consistent with the **draft London Plan**, industrial capacity is defined in Lewisham as existing commercial/industrial floorspace on site or the potential commercial/industrial floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater). Whilst the principle of no net loss of industrial capacity applies to overall areas of SIL and LSIS, and not necessarily to the individual sites within them, we will seek to ensure that individual proposals maximise the amount of employment floorspace. Furthermore, whilst the integration of mezzanines are broadly supported by the Local Plan as a way to make a more optimal use of land, mezzanine space will be excluded from calculations of industrial capacity for the purpose of this policy.

- 8.10. There may be limited exceptional circumstances where a plot ratio of lower than 65 per cent on development for employment uses may be acceptable in principle. For instance, some types of industrial uses require a significant amount of operational yard or servicing space to function effectively. The onus will be on the applicant to demonstrate that the policy requirements cannot be feasibly delivered, taking into account individual site circumstances and the nature of the proposed use. This should include evidence of alternative design options, such as site layouts and building typologies (including multi-storey or basement development), considered through the design-led process. These exceptional circumstances will not normally apply where the co-location of employment and other compatible uses is proposed in line with sites identified in [Policies EC2.C and EC5.B](#), and their corresponding site allocations, or land swaps.
- 8.11. Lewisham's Employment Land Study (2019) has informed the strategic employment floorspace requirement that the Local Plan will address over the plan period. It suggests that there is additional need for some 21,800 square metres of office floorspace up to 2038. This type of floorspace is normally associated with the B1a/b Use Classes. However, the study emphasises that office development is not a homogenous product, pointing to the wide range of workspace typologies now available (such as serviced offices, incubators, accelerators and co-working space). Further, continuing shifts in modern commercial practices mean sectors that might traditionally have been thought of as office sectors can be found occupying 'hybrid' space in re-purposed industrial premises. In short, there is increasing fluidity in the workspace market and some office uses do not fit neatly into the Use Class Order categories. Therefore, the council will take a broader view to planning for its future employment floorspace needs. We will promote the full complement of Class B1 uses, including B1c light industrial uses, to ensure that the Local Plan does not unnecessarily constrain employment development. Delivery of employment floorspace will be closely monitored over the plan period to ensure our policy objectives are being realised.

#### MAP – EMPLOYMENT LAND HIERARCHY

### EC 3 Location and design of new workspace

- A. Proposals for new employment development should be directed to sites in Lewisham's employment land hierarchy, as set out in [Policy EC2 \(Protecting employment sites and delivering new workspace\)](#). If suitable sites are not available within these areas, then proposals should be directed to appropriate town or edge-of-centre locations, and other highly accessible locations.
- B. New employment development will only be supported outside of designated employment areas and town centres where it is demonstrated that there are no suitable sites available for the proposed use. The appropriateness of a proposal will be assessed having regard to:
- Its contribution to the delivery of the spatial strategy for the Borough;
  - Accessibility including by walking, cycling and public transport;

- c. Compatibility of the proposed use with the adjoining and neighbouring land uses; and
  - d. Whether the employment floorspace provision is for temporary use.
- C. All new employment development must provide high quality, purpose built floorspace designed for commercial and industrial uses. Proposals will be expected to make a demonstrable improvement in the site's suitability for accommodating employment generating uses with particular consideration given to:
- a. Type of floorspace provided and the expected job density arising from this typology;
  - b. Provision of an appropriate full internal fit out, including connection-ready high speed broadband;
  - c. Provision of flexible space that can be adapted to the needs of different end users, including for micro, small and medium-sized businesses;
  - d. Site layout and design, with appropriate access and adequate space for the operational and servicing requirements of businesses;
  - e. Environmental improvements, including high quality public realm; and
  - f. Integrated place making, with particular consideration given to the development's interface and compatibility with adjoining and neighbouring uses, and protection of local amenity.
- D. Development proposals for self-contained live-work units will be strongly resisted.

### **Explanation**

- 8.12. This policy helps give effect to the spatial strategy for the Borough, which seeks that employment development is directed to the designated employment areas and town centres across Lewisham, including the Lewisham North Creative Enterprise Zone. By focussing activities in these locations we aim to ensure that residents have good access to a wide range of job opportunities and that businesses benefit from their proximity to complementary clusters of uses. Also, by concentrating employment development in these locations it will be easier to manage and protect the amenity of neighbourhoods, particularly from impacts associated with commercial and industrial uses.
- 8.13. Applicants are encouraged to engage with the council early in the site selection process for assistance with potential site development opportunities. Where new employment development is proposed outside of designated employment areas and town centres, proposals will be expected to demonstrate that no suitable sites are available in these locations to accommodate the intended use. Some flexibility may be afforded to temporary or meanwhile uses, depending on the nature of land use and individual site circumstances. Proposals will be resisted where they are at odds with the spatial strategy for the Borough.
- 8.14. We are committed to delivering a significant increase in local jobs and providing residents with good access to employment and training opportunities. Development proposals will therefore be assessed against their contribution to raising employment densities and, where appropriate, making provision for more

jobs and related opportunities (such as apprenticeships) than are currently available on site. Through the design-led process applicants should consider how to optimise and make more efficient use of land and floorspace. This may include consideration of layout to provide higher plot ratios and building solutions to enable integration of smaller business units, co-working and incubator space, vertical stacking / multi-storey development, mezzanines and basement levels.

- 8.15. All employment development should consist of well-designed, high quality and purpose built accommodation that positively responds to the local context. Flexibly specified buildings should be provided wherever possible. These are considered essential to ensuring the long-term sustainability and viability of employment land and premises. This is because they allow for the reconfiguration of internal space to suit new occupiers with different space requirements, and support business retention by enabling existing occupiers to expand in situ. Flexible specifications could also include, for example, full height delivery doors, capacity to site additional delivery doors to enable subdivision of buildings, and reallocation of space.
- 8.16. New development will also be expected to make appropriate provision for full internal fit out of buildings and workspace. This should normally include plumbing/heating, installation of sanitary and kitchen facilities, finishes for floors, walls and ceilings, and where appropriate, shopfronts and glazing. All internal fit outs must provide for modern communications facilities, including power points and connection-ready high speed broadband, having regard to [Policy TR7 \(Digital and communications infrastructure and connectivity\)](#). Proposals should provide sufficient details of interior fit outs at the application stage.
- 8.17. Proposals limited to 'core' and 'shell' only specifications are not considered appropriate and will be strongly resisted. This requirement is necessary to ensure the attractiveness and marketability of units, particularly in promoting early take up of workspace and preventing against long-term vacancies. It is also vital to supporting small and independent businesses which are unlikely to be in a position to absorb the initial overhead costs for fit out. Careful consideration should be given to the needs of the expected or potential end users at the early stage in the design process, particularly where agreements are in place. The appropriate level of fit out will be considered having regard to individual site circumstances.
- 8.18. Site layout is especially important for commercial and industrial operators. The effective functioning of employment sites is dependent not only on fit for purpose buildings but also their associated operational land. Proposals must therefore include consideration of vehicle access for loading and delivery, yard space, external storage, parking, site servicing and customer interface. A well-conceived layout is also essential to ensuring the protection and enhancement of local amenity, both for business operators within the employment area as well as the neighbourhoods in the immediate and surrounding locality. Developments must contribute to integrated place making in line with other policies in the Local Plan. This includes provision of a high quality public realm to enhance the

attractiveness of the employment area and positively contribute to local character. Planning statements should clearly address how the site and public realm will function and interface with adjoining uses, particularly on proposals involving mixed-use development or the co-location of uses.

- 8.19. Proposals for live-work units (i.e. residential and employment uses in the same self-contained unit for semi-permanent or permanent occupation) will be strongly resisted. Whilst recognising there is existing provision in the Borough, for example in Havelock Walk in Forest Hill, monitoring indicates the loss of employment provision through consenting live-work accommodation, with development reverting to fully residential use over time. This policy helps to guard against such loss, recognising the need to protect employment floorspace. In the case of mixed-use development including a commercial component the employment floorspace must be demonstrably separate from other uses, including any residential elements, and dedicated solely to business uses.

#### EC 4 Providing suitable business space and affordable workspace

- A. Development proposals incorporating business space should ensure that provision is made for suitable types and sizes of units, at an appropriate range of rents, particularly to meet the needs of micro, small and medium sized businesses, including start-ups.
- B. Development proposals that incorporate an element of affordable workspace, at rents maintained below the market rate, for specific types of social, cultural or economic uses will be considered favourably.
- C. Where there is existing provision of low-cost or affordable workspace on-site, proposals should seek to retain or re-provide this in any future redevelopment, also taking into account the specific circumstances set out in (C) below and [Policy LNA3 \(Lewisham North Creative Enterprise Zone\)](#).
- D. Within the following locations, where there is existing provision of affordable workspace on-site, proposals will be required to retain or re-provide this workspace in any future redevelopment unless it can be demonstrated that the affordable workspace has been provided on a temporary basis pending the redevelopment of the site:
- a. Designated employment areas (i.e. SIL, LSIS and MEL);
  - b. Major and District town centres;
  - c. The Creative Enterprise Zone; and
  - d. Railway arches.
- 8.20. New major commercial development, including major mixed-use development incorporating commercial floorspace, will be required to provide at least 10% of new employment floorspace as affordable workspace. This should be provided on site wherever feasible. Further details will be set out in the council's Planning Obligations Supplementary Planning Document.

- E. Where new affordable workspace is provided this must be secured for a specified period agreed with the council, with suitable arrangements in place to ensure the workspace is appropriately managed over this time. Affordable workspace will be secured by way of legal agreements or planning obligations.

### **Explanation**

- 8.21. Lewisham's Employment Land Study (2019) and Local Economic Assessment (2019) identify the lack of low-cost and affordable workspace as a key barrier to entry in the local economy. The cost of workspace can also act as a disincentive for businesses looking to start-up or locate within the Borough, or prohibit existing businesses from expanding locally. We will therefore seek that development protects existing low-cost and affordable workspace wherever possible. Proposals including such new provision will be treated favourably.
- 8.22. As set out in the **draft London Plan**, low-cost workspace refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space. This type of space is often located at the back of town centre sites, under railway arches and in smaller or constrained industrial sites. It accommodates traditional business sectors and, in Lewisham, has a key local role in supporting the cultural, creative and digital industries. Low-cost workspace has typically been scattered across town centres and areas such as New Cross and Deptford. Clusters are also present along the East London Line (Overground) corridor, for example, around Forest Hill and Brockley stations. However, the availability of low-cost workspace is increasingly limited, given the Borough's diminishing employment land supply and competing pressure on sites from higher value land uses.
- 8.23. Affordable workspace is workspace that is provided at rents maintained below the market rate. This type of workspace is important to support business start-ups, particularly in the cultural and creative sectors. For successful delivery of the Local Plan there is an imperative to grow Lewisham's economic base, and provision affordable workspace will be integral to achieving this. Therefore, all major commercial development, including mixed-use developments with a commercial component, must ensure that 10% of new employment floorspace is delivered as affordable floorspace.
- 8.24. We will seek that affordable workspace is delivered on-site as a priority. However flexibility may be applied for equivalent off-site contributions, in exceptional circumstances, where this is suitably justified. The workspace should be provided for a period agreed with the council, and this may be secured by use of conditions or planning obligations. Applications will be expected to submit evidence of an agreement to lease the affordable element at less-than-market level rent, ideally working with a recognised affordable workspace provider. Where this requirement cannot be satisfied, proposals must submit evidence of a viability assessment demonstrating why a lower level or no such provision of affordable floorspace is deliverable. The viability assessment must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.

## EC 5 Locally Significant Industrial Sites (LSIS) – formerly LEL

- A. Locally Significant Industrial Sites will be protected for a range of Class B Uses (B1, B2 and B8) along with appropriate Sui Generis uses, with priority being given to Class B1 uses. Development proposals should ensure that there is no net loss of industrial capacity within these locations, and seek to deliver net gains wherever possible.
- B. Within LSIS locations, proposals for self-storage and larger format storage and warehousing facilities will only be supported in exceptional circumstances where:
  - a. There is a demonstrable local need for this type of use;
  - b. The use cannot be reasonably located in a Strategic Industrial Location; and
  - c. The development will include provision of an element of floorspace for micro, small or medium-sized businesses.
- C. The co-location of employment and other compatible uses will only be supported at selected LSIS locations. This is in order to secure the long-term viability of LSIS sites and to help facilitate their renewal and regeneration. Proposals should not compromise the functional integrity of the LSIS as an employment location. Further development requirements are set out in site allocation policies for the following sites:
  - a. Blackheath Hill
  - b. Childers Street North
  - c. Clyde Vale
  - d. Lower Creekside
  - e. Manor Lane (Part)
  - f. Molesworth Street
  - g. Perry Vale
  - h. Stanton Square
  - i. Willow Way
  - j. Worsley Bridge Road
- D. Proposals for the co-location of uses on LSIS sites listed in (C) above which result in the net loss of industrial capacity will be strongly resisted and only permitted in exceptional circumstances, where the proposal:
  - a. Suitably demonstrates that the loss is necessary for reasons of feasibility, and the amount of industrial capacity has been minimised as much as reasonably practical, including through evidence of a development options appraisal considered through the design-led process;
  - b. Will not compromise the functional integrity of the LSIS or preclude the delivery of the spatial strategy for the borough;
  - c. Delivers wider public benefit(s) to overcome the loss of industrial capacity; and
  - d. Makes provision of at least 50 per cent affordable housing on the residential element of the development.

- E. For LSIS locations listed in (B) above, where an approved site-wide masterplan is not in place, proposals for non-employment uses will be assessed against the criteria in (F) and (G) below, which also apply to all proposals for all other LSIS locations (i.e. not listed in (B) above).
- F. Within LSIS proposals for non-employment uses (i.e. those outside of the B Use Class) will only be supported where they:
- a. Are not residential uses;
  - b. Are complementary and ancillary to the principal function of the LSIS in accommodating commercial and industrial uses;
  - c. Are necessary to support the long-term viability of the LSIS as an employment location, including through provision of services and facilities that meet the needs of modern business;
  - d. Will not adversely impact on the functional integrity of the LSIS or prejudice the continued operation of commercial and industrial uses on the site or within the employment area;
  - e. Do not result in an overconcentration of similar uses in the LSIS and its immediate surrounds; and
  - f. Will not compromise the delivery of strategic requirements for employment floorspace, having regard to the proposal's individual and cumulative impact.
- G. Within LSIS, proposals for strategic infrastructure will be acceptable where it is demonstrated that:
- a. The infrastructure is necessary to support the delivery of the spatial strategy for the Borough;
  - b. The use is appropriate to the industrial location and will not adversely impact on the functional integrity of the LSIS or prejudice the continued operation of commercial and industrial uses on the site or within the employment area; and
  - c. The loss of industrial capacity has been minimised as much as reasonably practical, and efforts have been made to replace any such losses.

### **Explanation**

- 8.25. Locally Significant Industrial Sites (LSIS) were formerly designated in the Core Strategy as Local Employment Locations (LELs). Their terminology has been updated for consistency with that used in the London Plan for sites of this function. LSIS play an important role in the local economy as a key source of the Borough's industrial land capacity and jobs. Lewisham's Employment Land Study (2019) confirms the need to protect LSIS over the long-term and sites have therefore been safeguarded in line with [Policy EC2 \(Protecting employment sites and delivering new workspace\)](#). New development within LSIS should be predominantly for industrial and commercial uses in the B Use Class, with priority given to Class B1 uses, as discussed below.
- 8.26. In order to make the best use of land there will need to be a managed process of employment site intensification. The Lewisham Employment Land Study (2019) provides that the Borough's future requirements are primarily for Class B1 uses.

We will therefore seek to resist proposals in LSIS that are solely for self-storage or larger format warehousing and storage facilities (normally included in the B8 Use Class). The built formats of warehousing units or self-storage facilities often do not provide for flexible re-use and are characterised by low employment densities, with limited opportunities for jobs compared to other development typologies. We need to ensure that these larger scale storage uses do not predominate on what is, in Lewisham, a very limited supply of employment land. However, it is acknowledged that storage facilities can help to support the wider regional economy, particularly the logistics sector. They also provide valuable space for smaller businesses and businesses requiring additional off-site provision. We will therefore consider proposals where applicants can show there is a local demand for the warehousing or storage use. Proposals must also demonstrate that there are no suitable or available sites in SIL where this type of development can be more appropriately located. This should include a detailed site survey investigating availability of sites both within and in proximity to Lewisham, including its neighbouring Boroughs and in those in the London southeast sub-region. All proposals for large format storage and warehousing should deliver an element of flexible workspace to meet needs of micro, small and medium sized business.

- 8.27. To secure the long-term viability of employment floorspace and to help facilitate the renewal of LSIS land, we will support proposals for the co-location of employment and other complementary uses on selected sites, as identified in [Policy EC5.B](#) above. Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the masterplan process. Our expectation is that there will be no net loss of employment floorspace capacity through the co-location process. Consistent with the [draft London Plan](#), floorspace capacity is defined as existing commercial floorspace on site or the potential commercial floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater). In applying the policy principles consideration will be given to the characteristics and operational requirements of different industrial uses, and in particular, yard and servicing space that is often essential for some commercial and industrial uses. Through the design-led process, proposals should consider how to maximise provision of floorspace capacity through the layout and configuration of buildings and spaces, in line with [Policy EC3 \(Location and design of new workspace\)](#).
- 8.28. Where the co-location of uses on LSIS identified in [Policy EC5.C](#) is proposed, development proposals should be designed to ensure there is no net loss of industrial capacity, and to seek net gains wherever possible. The net loss of industrial capacity will only be considered in very exceptional circumstances. Applicants must provide evidence to suitably demonstrate that the loss is necessary owing to reasons of feasibility and the loss has been minimised as much as reasonably practical. This must include evidence of different site layout, design and development typologies considered through the design-led process, taking into account individual site circumstances such as location and site configuration. Furthermore, to offset the loss of industrial capacity applicants will be required to demonstrate that a wider public benefit would be achieved

through the scheme. Finally, proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element, in line with the **draft London Plan policy H5 (Delivering affordable housing)**.

- 8.29. In the interim period where a site-wide masterplan has not been approved or agreed by the council, proposals for non-employment uses within LSIS will be resisted unless they meet the criteria of **Policy EC5.E**. This is to ensure that the employment generating function of LSIS land remains intact and is not eroded by the piecemeal introduction of non-employment uses.
- 8.30. Whilst LSIS is protected for Class B Uses it is recognised that other ancillary uses can help to support the attractiveness and viability of an employment site. Such uses may include small-scale workplace crèches, cafes, business services, community facilities and public amenity spaces. We will consider proposals for such non-employment uses on their individual merits, having regard to site circumstances. The intention is to ensure that LSIS remain attractive and viable places for business and that other uses do not compromise their predominantly commercial and industrial function.
- 8.31. All development on LSIS land must be sensitively integrated into the site and its surrounds and not prejudice the continued operation of industrial and commercial uses. To safeguard local economic interests, we will resist proposals that result in an overconcentration of similar or other non-commercial uses. Proposals will therefore be considered having regard to the cumulative impact of any non-employment uses. Many LSIS are located in proximity to town and local centres or transport hubs. Applications should therefore give consideration to the necessity of providing a non-commercial use within the LSIS where there may be similar accessible provision nearby.

## **EC 6 Mixed-use Employment Locations (MEL)**

- A. The comprehensive redevelopment of Mixed-use Employment Locations will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace. All development within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals will be expected to provide demonstrable improvements in the overall physical and environmental quality of the MEL, and ensure that new development is well integrated with adjoining and neighbouring land uses.
- B. All new development will be expected to protect and enhance the employment generating function of MEL land. Development proposals will be required to maximise the amount of Class B1 employment floorspace through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs. Proposals will be expected to make provision for new modern workspace and associated operational land (including yard space) and to ensure that this element is appropriately integrated within the MEL and its surrounding area.

- C. Where the comprehensive development of an MEL, or a site within the MEL, has been delivered through the masterplan process, all future proposals involving the redevelopment or change of use of land and floorspace must:
- a. Retain, and wherever possible seek to increase, the proportion of industrial capacity (including Class B floorspace) across the MEL, as originally approved in the masterplan; and
  - b. Ensure there is no net loss of existing industrial capacity.

### Explanation

- 8.32. Mixed-use Employment Locations were first designated in Lewisham's Core Strategy (2011). These locations consisted of older, poorer quality and redundant industrial land, buildings and uses that were often incompatible with their neighbouring residential areas. To help facilitate regeneration in the north of the Borough, the council made provision for the plan-led consolidation and redevelopment of MEL land. The key aim was to tackle deprivation and inequality by improving the quality of the urban environment, delivering new housing and securing investment in strategic transport and community infrastructure. To secure mixed and balanced communities, and to safeguard employment capacity locally, local plan policies required new development on MELs to deliver 20 per cent of new built floorspace as employment floorspace.
- 8.33. Since the Core Strategy came into effect a number of MELs have come forward for redevelopment (with works having started and/or completed on some sites, and planning consent granted on others). Developments have made provision for new modern and improved employment floorspace, including affordable workspace. However, monitoring information indicates that the 20 per cent requirement has not always been achieved on committed sites. This is mainly owing to the introduction of taller and tall buildings with significant amounts of residential floorspace on some sites, presenting feasibility challenges for meeting the proportionate employment floorspace thresholds. However, the delivery of new modern workspace in mixed-use schemes has been demonstrated to be viable, with new completed schemes contributing to transformational investment in the local area. We therefore remain committed to the plan-led consolidation of MELs to support growth and regeneration objectives.
- 8.34. The Lewisham Employment Land Study (2019) provides that MEL locations should continue to be protected for employment generating uses. Therefore, they have been safeguarded in line with [Policy EC2 \(Protecting employment sites and delivering new workspace\)](#), whilst recognising their ongoing role in supporting strategic regeneration objectives. This policy should be read in conjunction with relevant site allocation policies, which set out further detailed site development principles, requirements and guidelines. These reflect the key role of MELs in contributing to the delivery of the spatial strategy. In particular, to support the creation and enhancement of well-connected, mixed and liveable neighbourhoods in the Deptford and New Cross areas.

- 8.35. MELs are important to the achievement of the Local Plan objectives and have significant potential to deliver new modern workspace in the Borough. We will therefore seek to ensure that development maximises the amount of new employment floorspace provided by the redevelopment of sites. Through the masterplan process, applicants will be expected to provide evidence of efforts made to maximise provision of employment floorspace and associated operational land. This may include evidence of the site layout and design options explored through the design-led process, along with consideration given to a different workspace typologies (e.g. light industrial, co-working, incubator or accelerator space), and nature of employment uses.
- 8.36. Comprehensive redevelopment of MEL land must provide for a demonstrable uplift in the number of jobs, both within the site and across the MEL. Employment uplift will normally be considered against the applicant's evidence of the number of jobs provided by the most recent authorised use on the site. Where land is vacant or a site has been cleared, the baseline jobs figure should be established using the last active use. What comprises a 'significant uplift' in the number of jobs, in line with Policy EC6.B, will be considered on a case by case basis, taking into account individual site circumstances. At a minimum, applicants should demonstrate that the new development will deliver a higher employment density and an increase in the number of jobs. Notably, jobs secured during the planning, design and construction phases will not count towards the uplift, which must be calculated for the operational phase of development, and limited to on-site employment provision secured only. The quality of employment provision will also be taken into account when considering proposals.
- 8.37. In line with [Policy EC3 \(Location and design of new workspace\)](#) it is expected that all new development will make provision for high quality and flexibly designed workspace, including an appropriate fit out. Consideration will need to be given to the layout of development in accommodating different uses, including the functional relationship and interface between them, at the early stage in the planning and design process. This will help to ensure the workspace provision is appropriately integrated and can be maintained over the long term.
- 8.38. The comprehensive mixed-use redevelopment of some MEL sites has now been realised, for example, at Plough Way (Core Strategy Strategic Site Allocation 5). It is important that the new employment provision secured here, and at other such recently delivered MEL sites, is retained over the long term. We will strongly resist any future proposals for redevelopment of any part of an MEL site, including changes of use, which would result in a net loss of the employment floorspace originally consented through the masterplan process. Where redevelopment is acceptable in principle, proposals should seek opportunities to provide net gains in workspace and jobs.

## EC 7 Non-designated employment sites

- A. Non-designated employment sites make an important contribution to Lewisham's local economy by providing workspace for businesses and job opportunities. New

development should not result in the net loss of viable industrial capacity on such sites.

- B. To ensure the continued viability of non-designated employment sites, proposals for employment-led, mixed-used development will be supported where a site is within a highly accessible location, or the site forms part of a cluster of commercial, industrial and/or other employment generating uses, and the development:
- a. Maximises the amount of industrial capacity provided, including employment floorspace;
  - b. Provides demonstrable improvements in the site's suitability for continued employment use, having particular regard to [Policy EC3.C \(Location and design of new workspace\)](#);
  - c. Does not compromise the employment generating function of the site and any adjoining or nearby sites, particularly where they form part of a complementary cluster of uses;
  - d. Ensures appropriate protection of amenity both for the users of the development and neighbouring properties; and
  - e. Secures the provision of affordable housing for any residential element introduced, in line with [Policy H3 \(Genuinely affordable housing\)](#).
- C. On all other non-designated employment sites (i.e. those which fall outside the location requirements in (B) above) development should not result in the loss of viable industrial capacity, unless it can be demonstrated that the building or site is not suitable for continued business use having regard to:
- a. Feasible alternative commercial, industrial and/or employment generating uses;
  - b. The condition of the existing building(s) and reasonable options for the refurbishment and/or reconfiguration of floorspace to enable continued occupation by employment generating uses;
  - c. Site constraints including layout, access and compatibility with neighbouring uses;
  - d. Long-term vacancy; and
  - e. Evidence of recent and continuous marketing, covering a minimum period of 24 months and at an appropriate rental or sale value.
- D. On sites where the introduction of a residential element is acceptable in line with (C) above, proposals will be required to secure the provision of affordable housing, in line with [Policy H3 \(Genuinely affordable housing\)](#).
- E. Where proposals involve the loss of employment land and floorspace a financial contribution towards training or other employment related initiatives will be sought, in line with [Policies EC9 \(Workplace training and job opportunities\)](#) and [DM2 \(Infrastructure funding and planning obligations\)](#).

## Explanation

- 8.39. There are a number of smaller sites outside of the Borough's designated employment areas that support a range of commercial, industrial and other employment generating uses. Both individually and cumulatively, these sites play an important role in the local economy through their offer of complementary business services and activities, as well as providing a source of local job opportunities. However non-designated employment sites are under increasing pressure from higher value land uses, such as housing. There is a risk that the functional integrity of these sites will be compromised or lost without an appropriate level of protection. We will therefore seek to safeguard these sites for employment use and strongly resist proposals involving the loss of industrial capacity. However, it is recognised that flexibility is needed to respond to market signals, ensuring that a site is not unnecessarily protected when there is no reasonable prospect of it remaining in employment use.
- 8.40. To maintain the viability of non-designated employment sites, we will support proposals for employment-led, mixed-used redevelopment where a site within a highly accessible location or the site forms part of a cluster of employment generating uses. This includes sites within town centre or edge of centre locations, or where several employment, retail or related community or cultural uses in proximity to one another form a cluster of complementary activities. All applications for such enabling development must be accompanied by an assessment that demonstrates the mixed-use scheme is necessary for reasons of economic viability (i.e. a non-employment use is required to make employment development viable). Where there is a net loss of employment floorspace, we will seek that any residential element makes provision for affordable housing, in line with [Policy HO3 \(Genuinely affordable housing\)](#). The viability assessment must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.
- 8.41. In considering proposals, we will seek that the maximum reasonable amount of floorspace is delivered taking account of the minimum amount of non-commercial floorspace needed to make development viable. Proposals should clearly set out the net change in industrial capacity resulting from the development, including operational land and yard space, along with an indication of the number of jobs to be accommodated by the new employment element. Proposals should seek to increase employment densities to realise net gains in jobs even where the amount of floorspace is diminished.
- 8.42. Where enabling mixed-use development is proposed, it is important that uses do not impact on the functional integrity of the site or inhibit its ability to continue supporting commercial uses. Furthermore, development will be expected to make appropriate provision for flexible or adaptable workspace including an internal fit out of buildings, in line with the requirements of [Policy EC3 \(Location and design of new workspace\)](#).
- 8.43. Elsewhere in the Borough, we will seek to safeguard viable non-designated employment sites for employment generating uses. Changes of use will only be permitted where it is satisfactorily demonstrated that a building or site is not viable

for employment development, as justified through an active and continuous marketing campaign. In line with London Plan Supplementary Planning Guidance, the minimum time period for marketing should be for at least two years. However we may apply this requirement more flexibly based on individual site circumstances. All development and uses will need to be sensitively integrated into the locality and positively contribute to amenity.

- 8.44. Where proposals involve the loss of employment floorspace a financial contribution towards training or other employment related initiatives will be sought, in line with [Policies EC9 \(Workplace training and job opportunities\)](#) and [DM2 \(Infrastructure funding and planning obligations\)](#).

## EC 8 Railway arches

- A. Development proposals involving railway arches will be supported where:
- The principal use is for an appropriate commercial or industrial use, or otherwise for an operational use associated with the railway;
  - They do not obstruct or have an adverse impact on the public highway and railway network;
  - They have fully investigated and maximised opportunities to improve accessibility in the local area, including connections through the arches, where appropriate;
  - The design of development is appropriate to its setting, including positive frontages in town centre locations; and
  - Existing lower-cost or affordable workspace is retained or re-provided, in line with [Policy EC4 \(Providing suitable business space and affordable workspace\)](#).
- B. Proposals involving the comprehensive redevelopment of sites that include, or are adjacent to, railway arches will be expected to address the use of the arches through the masterplan process.

### Explanation

- 8.45. There are a number of railways intersecting the Borough, some of which are supported by arches at points including within designated employment areas and town centres. There are opportunities to maximise the use of the space within these arches and the ancillary land adjacent to them. Many arches are already being used for a variety of commercial and industrial uses, with some providing low-cost and affordable workspace. This provision is important to smaller and independent businesses, including in the creative and cultural industries. We will support the continued use of arches in this way and work with stakeholders to maximise opportunities for new or enhanced workspace that is appropriate to its location.
- 8.46. All development proposals should help to improve the quality of the urban environment, make a positive contribution to local character and protect the amenity of neighbouring properties. Where railways sever or impede local area

connections, proposals will be expected to fully investigate opportunities to open up arches and introduce routes to improve accessibility. In the case of major applications, including the comprehensive redevelopment of sites, railway arches should be considered through the site masterplan process. This will help to ensure land and space is put to its optimal use and supports delivery of the spatial strategy.

## EC 9 Workplace training and job opportunities

- A. To support objectives for delivering an inclusive local economy, new development is encouraged to actively source local business, recruit local workers and make available job and training opportunities to Lewisham residents.
- B. All proposals for major development will be required to provide job and training opportunities to Lewisham residents, including apprenticeships. This will be secured by way of conditions or planning contributions.
- C. Development proposals involving a net loss of employment floorspace in designated employment locations and non-designated employment sites will be resisted, unless such loss is part of a plan-led process of employment land consolidation. Where new development results in a net loss of employment floorspace, contributions will be sought towards local employment and training initiatives, to be secured through conditions or planning contributions.

### Explanation

- 8.47. It is important that local residents are able to share in London's economic growth and prosperity. To achieve a more inclusive local economy, Lewisham residents must be well equipped to access jobs, advance career prospects and fulfil their aspirations. Everyone, regardless of their background or experience, should be able to develop their skills through lifelong learning and have good access to these opportunities.
- 8.48. High unemployment levels, low incomes and deprivation persist in parts of the Borough because of certain barriers to employment that people experience, most notably the lack of skills that are required in the jobs market. There are particular local issues with respect to adult literacy and numeracy, for example. We will address these underlying causes of deprivation in a proactive way, including through the planning process.
- 8.49. Applicants, developers and business owners are encouraged to recruit local labour, source local business and provide residents with opportunities for workplace training, such as apprenticeships. Consideration should be given to sourcing at all stages in the development process, and particularly in the construction and operational phases. This will not only benefit residents but the use of local labour and business can also limit the environmental impact of new development, for example, by helping to reduce the need for long distance commuting and the transport of materials. Major developments provide greater

scope for local jobs and training opportunities, and all such proposals will be expected to demonstrate how they will contribute to meeting the policy objectives.

- 8.50. We will seek to prevent against the loss of all employment floorspace given the Borough's forecast future requirements. In exceptional circumstances where such loss can be appropriately justified, development will be expected to make compensatory provision through planning contributions. Some flexibility may be applied in the case of Mixed-use Employment Locations, where the consolidation of employment land is managed through the plan process.
- 8.51. Further details on the nature and level of contributions sought are set out in the council's Planning Obligations SPD (2015), or any equivalent document which may supersede it in the future.

## EC 10 Town centres at the heart of our communities

- A. Town centres are at the heart of Lewisham's communities and focal points for retail, commercial, cultural, leisure, and civic activities. Town centres will be positively managed in order to ensure they are attractive and lively places that are resilient to future challenges, particularly those presented by new technology and changes in consumer behaviour.
- B. The long-term vitality and viability of Lewisham's town centres will be secured by:
- Focussing future growth and investment within and around them, particularly to strengthen connections to surrounding neighbourhoods;
  - Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the locality, including their built form, historic and cultural character;
  - Ensuring they are safe and healthy places that are accessible to all, with high quality public realm that encourages street level activity along with opportunities for social interaction and relaxation;
  - Delivering an appropriate mix and balance of uses in order to attract businesses and visitors, including provision of a wide range of workspaces and premises to accommodate a variety of shops, services and facilities; and
  - Promoting town centres as vibrant places of daytime, evening and night-time activities.

### Explanation

- 8.52. Town centres are at the heart of Lewisham's communities. They all have distinctive features that reflect and help to reinforce the Borough's character and diversity. Town centres are also important hubs of daytime and evening activity, and offer a variety of accessible retail, commercial, cultural, leisure and civic facilities. The Local Plan seeks to ensure that town centres continue to have an important role in supporting our local communities, including by directing future growth and investment to and within them.

- 8.53. On whole, Lewisham has a well-functioning network of town centres with retail and related service provision that meets the daily needs of local residents, workers, students and other visitors. However some centres are performing better than others, for example, as evidenced by vacancy rates. It is important to prevent against the decline of our high streets and centres by encouraging the take up of units and appropriately managing uses, along with implementing measures to improve their vitality and viability in the short-term.
- 8.54. Equally, there is a need to ensure that town centres remain resilient and adaptable to change over the long-term. This is particularly in response to changes in consumer behaviour and modern business activities, including multi-channel (online) shopping, which are creating new challenges. Whilst online shopping is affecting the retail sector, traditionally a stronghold of town centres, this has opened opportunities for the re-use of buildings. Complementary cultural, leisure and community uses are increasingly taking up space in town centres, helping to attract visitors. Furthermore, town centres are now becoming a focal point for higher-density mixed-use development, including housing. Whilst protecting the retail function of the Borough's town centres is crucial, we will seek to ensure that centres are able to evolve and adapt over time, so that they continue to support the communities in which they are situated.
- 8.55. Lewisham's town centres have distinctive characteristics that are reflected in their built form, historic fabric and cultural character. Lewisham's Characterisation Study (2019) is helpful in articulating this. Where new development is proposed it is important that this contributes positively to the character of the townscape. Furthermore, development will be expected to deliver high quality urban environments that are safe and accessible to all, and which promote the health and well-being of the population. Centres experience a large number of visitors, including workers, and host a range of civic, cultural and leisure activities. A well-designed and appropriately managed public realm is therefore essential. It is also imperative that town centres remain lively and active places that are able to support a variety of uses, and where people have opportunities for leisure and relaxation throughout the daytime and evening.

## EC11 Town centre network and hierarchy

- A. All new development must support and reinforce Lewisham's town centre network and hierarchy. Proposals will be required to demonstrate how they will enhance town centre vitality and viability, commensurate with the role and function of the centre, in accordance **Table X** below.
- B. Development proposals for main town centre uses should be directed to centres within Lewisham's town centre hierarchy. They should also support the appropriate distribution of these uses in order to meet the Borough's future need for 5,300 net additional square metres of retail floorspace over the ten year period 2020-2030. The majority of new retail floorspace will be accommodated in Lewisham and Catford town centres.

- C. Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its future reclassification as a Metropolitan centre. This includes supporting investment and facilitating delivery of strategic infrastructure necessary to ensure the centre can effectively serve a local and wider sub-regional catchment.
- D. The council will seek to resist proposals for new out-of-centre retail uses, including retail parks. It will investigate the role and function of existing out-of-centre retail sites in order to identify future opportunities to optimise site potential in supporting the spatial strategy and delivering sustainable communities in the Borough.

<b>Lewisham's Town Centre Network and Hierarchy</b>		
Classification	Location	Role/function
Major town centre	Lewisham Catford	
District town centre	Blackheath Deptford Downham Forest Hill Lee Green New Cross Gate - <b>Consolidated</b> Sydenham	
Local centre (formerly neighbourhood local centre)	Bellingham - <b>New</b> Brockley Cross Burnt Ash - <b>New</b> Crofton Park Downham Way Hither Green - <b>New</b> Honour Oak / Brockley Rise - <b>New</b> Grove Park Ladywell - <b>New</b> Lewisham Way New Cross Road – <b>New (changed from District)</b> Upper Sydenham - <b>New</b>	
Shopping parade	There are over 80 parades dispersed across the Borough	

### Explanation

- 8.56. This policy establishes the Borough's town centre hierarchy and describes the main role and function of the centres within it. The London Plan classifies Major and District town centres whereas Local Centres are designated by local planning policy. Shopping parades and other neighbourhood service nodes, including corner shops, are included in the hierarchy given their complementary function but are not formally designated. The boundaries of the town centres within this hierarchy are shown on the Policies Map, along with the corresponding Primary Shopping Areas for Major and District Centres.
- 8.57. All new development is expected to facilitate delivery of the Borough's spatial strategy by supporting and reinforcing Lewisham's town centre network and hierarchy. Proposals will need to reflect the main development principles for each

of the centres in the hierarchy. This means having regard to the unique role of each centre in supporting communities within their catchment, both within and outside of the Borough.

- 8.58. Major centres typically contain over 50,000 square metres of retail and related town centre floorspace, offering a range of comparison and convenience goods along with complementary leisure and cultural functions. They have Borough-wide catchments and may draw trade from several Boroughs depending on their location. The Major centres of Lewisham and Catford are the highest order centres in Lewisham and will continue to perform a key strategic role as focal points for community activity.
- 8.59. Lewisham town centre is a key focal point of the Borough and is its principal shopping and leisure destination as well as a major transport hub. Whilst Lewisham is currently defined as a Major centre it is undergoing significant transformation and offers the potential to be reclassified as a Metropolitan centre in the future, as indicated by the **draft** London Plan. The town centre already benefits from excellent public transport links, and the proposed Bakerloo Line Extension (BLE) route with a key interchange at the centre would further entrench the sub-regional importance of the centre. This new Local Plan will supersede the Lewisham Town Centre Local Plan (2014) in setting the strategic framework to deliver the vision for a Metropolitan centre.
- 8.60. Catford town centre is distinguished by its unique civic and cultural functions that the Local Plan seeks to reinforce and build upon through targeted regeneration and renewal, aided by investment in strategic transport infrastructure.
- 8.61. Other District centres... to be completed.
- 8.62. Local centres... to be completed.
- 8.63. Parades... to be completed.
- 8.64. With the levels of growth planned in the Borough up to 2040, it is important that neighbourhoods are supported with appropriate provision of shops, services and community facilities. Lewisham's Retail Capacity Study Update (2019) forecasts needs for retail floorspace within the Borough over the plan period, with need figures set out in five year intervals. It indicates that 5,300 net additional square metres of retail floorspace are needed over the ten year period 2020-2030 (comprising -500 sqm comparison and +5,800 convenience goods). It also suggests that some 14,500 net additional square metres of retail floorspace will be needed in the fifteen year period 2020-2035 (comprising 6,900 sqm comparison and 7,600 sqm convenience goods).<sup>23</sup>
- 8.65. The study also identifies that the majority of this floorspace can be accommodated in Lewisham and Catford Major Centres. The council will monitor

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<sup>23</sup> The Lewisham Retail Study Update (2019) suggests that figures beyond the 10-year period 2020-2030 should be considered as indicative and reviewed throughout the plan period.

progress towards the delivery of this requirement through the Authority Monitoring Report process.

- 8.66. There are established out-of-centre retail facilities in Lewisham, including at Bell Green and Bromley Road. Whilst recognising there is a need for additional retail floorspace in the Borough over the plan period, Lewisham's Retail Capacity Study Update (2019) identifies that this capacity can be accommodated within the existing town centre network, particularly at Lewisham and Catford centres, and is not reliant on new out-of-centre development to meet future requirements. Indeed, it forecasts a future reduction in the need for out-of-centre retail floorspace.
- 8.67. All new proposals for out-of-centre development will be assessed having regard to the NPPF and **Policy EC 12 (Location of new town centre development)**. We will investigate the role and function of existing out-of-centre retail sites in order to identify future opportunities to optimise their potential in supporting the spatial strategy and delivering sustainable communities in the Borough. This includes opportunities that may arise through planned strategic infrastructure investment, particularly in respect of any future commitments to the Bakerloo Line Extension.

#### **MAP – TOWN CENTRE HIERARCHY (MAJOR, DISTRICT, LOCAL CENTRES)**

### **EC 12 Location of new town centre development**

- A. A 'town centres first' approach should be applied when considering the location of new retail, commercial, leisure and cultural uses (i.e. main town centre uses).
- B. Within Major, District and Local Centres development proposals for new retail, commercial, leisure and cultural uses will be supported where they:
- Are compatible with the scale, role, function and character of the centre and its catchment;
  - Sustain and enhance the vitality and viability of the centre; and
  - Positively respond to the delivery of the spatial strategy for the Borough.
- C. Only where it is demonstrated that suitable sites are not available within designated centres will the council consider proposals for new retail, commercial, leisure and cultural uses at edge-of-centre locations, or if no suitable edge-of-centre sites are available, at out-of-centre locations.
- D. Retail impact assessments will be required on proposals for main town centre uses of 500 square metres gross floorspace or more at edge-of-centre and out-of-centre locations. Assessments must demonstrate that:
- There is an identified need for the amount and type of floorspace proposed; and
  - The proposal, either by itself or in combination with other existing, committed or planned development, will not adversely impact on the vitality and viability

of Lewisham's town centre network and hierarchy and its wider catchment.

### Explanation

- 8.68. This policy sets out the 'town centre first' approach for the location of new retail, commercial, leisure and cultural uses (i.e. main town centre uses as defined by the NPPF). Such uses should be directed to the Borough's designated town centres, in accordance with the sequential approach to site selection set out in national planning policy. This means that existing centres should be the focus of the initial site selection exercise. Only where it is demonstrated that suitable town centre sites are not available will we consider proposals at accessible and well-connected edge-of-centre locations. Proposals should include a statement setting out how the development is compatible adjoining and neighbouring uses. Out-of-centre development is at odds with the Borough's spatial strategy and is therefore strongly discouraged, however proposals will be considered where it can be shown through the sequential approach that there are no suitable sites available.
- 8.69. Inappropriate edge-of-centre and out-of-centre developments, either individually or cumulatively, can compromise the integrity of the town centre hierarchy by competing with established centres and undermining their economic performance. We will therefore seek to ensure that all efforts have been made to direct new development to existing centres, particularly the Borough's Major centres for larger format retail schemes. Applicants will be expected to give consideration to a range of site options and demonstrate flexibility with respect to the scale and format of development in order to overcome potential site constraints within town or edge-of-centre locations.
- 8.70. Outside of designated centres, retail impact assessments will be required for proposals of 500 square meters gross floorspace or more. This local threshold is more rigorous than that set by national policy and is informed by Lewisham's Retail Capacity Study Update (2019). It provides wider scope for the consideration of proposals that could adversely impact on Lewisham's town centre hierarchy and compromise delivery of the spatial strategy.
- 8.71. Flexibility will be applied to proposals for commercial uses in the B1 Use Class, recognising that these uses will also be acceptable in designated employment areas, consistent with [Policy EC3 \(Location and design of new workspace\)](#).

## EC 13 Optimising the use of town centre land and floorspace

- A. Development proposals should optimise the use of land and floorspace within town centres by:
- a. Delivering new mixed-use schemes on individual sites and through comprehensive redevelopment of multiple sites, where appropriate;
  - b. Investigating opportunities for the reuse and reconfiguration of existing space, or the provision of new additional space above shops and commercial premises; and
  - c. Avoiding designs that comprise of single-storey development.

- B. Within town centres proposals for new mixed-use development, including development involving the expansion, reuse or reconfiguration of existing floorspace, will be considered having regard to:
- a. The role and function of the centre;
  - b. Impact on town centre vitality and viability;
  - c. Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and
  - d. Compliance with other policies.
- C. Subject to (A) and (B) above, where a proposal includes a residential use the development must:
- a. Not adversely impact on the function, appearance and character of the town centre, including its shopping and other frontages; and
  - b. Provide adequate access arrangements for all of the building occupiers including separate secured access for the residential element.
- D. Development proposals involving existing retail and commercial units should ensure ancillary floorspace that is integral to business operations (such as space for storage and back-office functions) is not compromised or lost.

### **Explanation**

- 8.72. It is important that Lewisham's town centres are positively managed in order to secure their long-term vitality and viability. This means making them more adaptable and resilient to change, as well as maximising the use of land within them. To support the continued commercial role of centres and facilitate their diversification, we will seek to optimise opportunities for additional sources of land and space to come forward through the planning process. This includes underused or vacant upper storeys of existing town centre buildings and airspace above relatively low-density or single-storey commercial uses. These spaces can help to accommodate a range of uses to meet local needs including for workspace, community facilities and housing.
- 8.73. Proposals for new single-storey development in town centres will be strongly resisted given the imperative to make efficient use of the Borough's limited land supply. This is particularly in accessible town centre locations that are better suited to a wider mix of uses and where higher levels of density are appropriate. However it is recognised that for some uses a multi-storey format may not be deliverable owing to issues of compatibility of use(s), fit with local character, site constraints or development viability. Where single-storey buildings are proposed, applicants will be expected to provide a statement and supporting evidence clearly justifying why a multi-storey development is not appropriate or deliverable.
- 8.74. Mixed-use development may involve the intensification or reconfiguration of existing sites. We have set parameters for strategic town centre sites in the site allocation policies of this Local Plan, which will help to ensure future development is appropriate to its location and designed to a high quality standard. Elsewhere,

proposals for intensified mixed-use development will need to demonstrate that they can be supported by good levels of public transport accessibility and are compatible with the role and function of the centre within which they are located, in addition to complying with other policies.

- 8.75. All development proposals, including changes of use, should ensure that any ancillary floorspace within a commercial unit is retained. This includes space for storage, back office functions and amenities, such as toilets and cleaning facilities. It is important that development does not compromise the continued business operation of existing commercial premises, whether through the reconfiguration of space or site redevelopment.
- 8.76. This policy helps give effect to the NPPF and London Plan in seeking to facilitate sustainable development by locating housing within town centres. In addition to meeting local housing need, residential development in such highly accessible locations can help to strengthen town centre vitality and viability by generating footfall and street level activity. We will take a positive view on mixed-use residential schemes which make better use of underused or vacant sites and buildings, including spaces above relatively low density retail and commercial uses, provided they do not adversely impact on the function and character of the centre.

## EC 14 Major and District Centres

- A. All new development within Major and District centres must support the vitality and viability of the town centres and make a positive contribution to their local character. Development proposals will be required to submit a statement to demonstrate how the use is appropriate to its location and will provide for a beneficial mix of uses within the town centre.

### Primary Shopping Areas

- B. Primary Shopping Areas are the locations within Lewisham's Major and District centres where retail uses are concentrated. Proposals for new retail development are encouraged to locate in the Primary Shopping Areas in order to support and enhance these complementary clusters of uses.
- C. In Lewisham and Catford major town centres, development proposals should ensure that Class A1 (retail) uses in Primary Shopping Areas are maintained at a minimum of 50 per cent, as a proportion of all units. This will help to ensure that a sufficient level of shopping provision is available as part of the wider town centre offer. Proposals that result in the percentage of A1 uses falling below this threshold will only be supported where:
- It can be demonstrated that the premises have been vacant and actively marketed, for a minimum continuous period of one-year, and there is no reasonable prospect of the unit continuing in an A1 use;
  - The use is an appropriate main town centre use;

- c. The use will significantly enhance, and not adversely impact on, the vitality and viability of the town centre, whether individually or cumulatively with other development;
  - d. The use will attract visitors to and generate activity within the town centre;
  - e. An active frontage is provided at the ground floor level; and
  - f. There will be no harmful break in the continuity of the remaining retail units, so to ensure the predominant retail function and character of the Primary Shopping Area is maintained.
- D. In the District town centres of Blackheath, Deptford, Downham, Forest Hill, Lee Green and New Cross Gate development proposals for Class A1 (retail) uses should seek to locate in the Primary Shopping Area, and only where suitable sites are not available should proposals locate to sites elsewhere in the town centre. Within the Primary Shopping Area, proposals for main town centre uses which are not A1 uses will be supported where:
- a. It can be demonstrated that the use will not adversely impact on the vitality and viability of the town centre, including by the overconcentration of non-retail uses;
  - b. The use will attract visitors to and generate activity within the town centre; and
  - c. An active frontage is provided at the ground floor level.
- E. In Sydenham District Centre, development proposals will be considered against the requirements set out in (C) above.

The wider town centre area

- F. Within the Major and District town centre boundaries, and outside of Primary Shopping Areas, development proposals for main town centre uses will be supported where:
- a. The use does not result in a harmful overconcentration of similar uses, having regard to [Policy EC17 \(Concentration of uses\)](#); and
  - b. An active frontage is provided at the ground floor level, or if this is not possible, a window display or other appropriate positive frontage.
- G. Proposals for residential units on the ground floor level or below, both within the Primary Shopping Areas and the wider town centre area, are inappropriate and will be strongly resisted. This includes proposals for the conversion of units currently in a main town centre or complementary commercial, cultural or community use.

## MAP – MAJOR/DISTRICT CENTRE BOUNDARIES & PRIMARY SHOPPING AREAS

### Explanation

- 8.77. This policy defines the Primary Shopping Areas within Lewisham's Major and District Centres, which are reflected on the Policies Map. Primary Shopping Areas are characterised by their predominantly retail function and remain a focal point

for town centre activity, particularly as they tend to be in the most accessible parts of the centre. We will seek to ensure that the functional integrity of these areas is maintained and enhanced, so to support the long-term vitality and viability of the town centres.

- 8.78. The Local Plan provides flexibility for a wide range of uses to locate within town centres. It is nonetheless important that a critical mass of retailing uses is maintained within the Primary Shopping Areas to reinforce their retail role and character. All proposals for Class A1 uses should seek to locate within these areas. Only when suitable sites are not available here should other town centre locations be considered in the site selection process.
- 8.79. A threshold approach will be used to manage the balance of uses in the Major Centres of Catford and Lewisham, so that Class A1 (retail) uses form the majority of uses within the Primary Shopping Areas. These centres are highest order centres in the Borough's town centre hierarchy. The Lewisham Retail Capacity Study (2017) and Update (2019) provides that they must continue to play a key role in accommodating the Borough's current and future needs for retail floorspace. The 50% threshold has been informed by our latest town centre surveys. It is considered a realistic and reasonable indicator for the point at which the Primary Shopping Areas can retain their principal retail function and provide sufficient capacity to help meet Lewisham's future floorspace needs. Proposals that would result in the overall percentage falling below this minimum level will be resisted. However, some flexibility may be applied where it can be suitably demonstrated through evidence of a vacancy and marketing exercise that the premises have no reasonable prospect of being retained in an A1 use, and other requirements are satisfied.
- 8.80. In the Borough's District Centres, proposals for Class A1 uses should seek to locate to the Primary Shopping Areas in the first instance. Main town centre uses for non-retail uses will only be supported where the use will make a demonstrable improvement to town centre vitality and viability, along with satisfying other tests. Unlike for Major Centres, a threshold approach will not be applied in the District Centres (except Sydenham) as these have evolved over time to perform distinct functions within their local area catchments. For example, in Blackheath, the centre is characterised by its café and restaurant culture and the catchment relies less heavily on its retail function. In Deptford, the centre's main retail element is the market, and shops along the high street play a more ancillary role. In short, there are variances in the role and nature of uses in the District Centres. A standard threshold approach is not considered appropriate given this situation, and in a few cases, the comparatively low baseline of A1 uses present in the Primary Shopping Area would make delivery of a high threshold challenging. However, we will continue to work with stakeholders and applicants to protect and improve local shopping provision, recognising that centres will continue to evolve in response to the population and household growth within their catchments.
- 8.81. A threshold approach will be applied in Sydenham District Centre, with the expectation that Class A1 uses will form the majority of uses in the Primary

Shopping Area. Sydenham town centre is unique amongst the Borough's District Centres in that it has a very high level of shops, with a comparatively lower level of services. Our latest surveys show that Class A1 uses comprise roughly three-quarters of total units across the centre, and more than half of units in the Primary Shopping Area. This suggests that the centre is performing a key role in supporting this southern part of the Borough with shopping provision. We will continue to support this role, whilst providing flexibility for other complementary uses to come forward.

- 8.82. We will regularly monitor the percentage of uses in Major and District centres and report findings in the Authority Monitoring Report (AMR). Applicants will be required to refer this information as a starting point for considering the balance of uses, and may be required to provide their own assessment, for example, where several months have passed since the publication of the AMR. To determine the existing Primary Shopping Areas A1 percentage figure, the number of Use Class A1 units should be divided by the total number of units within the Primary Shopping Area.
- 8.83. Breaks in the continuity of shopping frontages threaten to diminish the retail function, character or appearance of town centres. We will therefore seek to restrict the conglomeration of non-retail uses in Primary Shopping Areas. Where a proposal would result in a harmful break of the retail frontage (normally 3 or more adjoining non-retail uses) it must demonstrably improve town centre vitality and viability, such as by introducing a use that encourages linked trips or providing more active shopfronts.
- 8.84. Complementary uses that attract visitors to the retail core, offering opportunities for meeting and relaxing, such as cafes and coffee shops, can enhance the vibrancy of town centres. Such uses will therefore be supported where they do not compromise the dominant retail function of the Primary Shopping Area, along with satisfying other requirements.
- 8.85. Active frontages are vital to maintaining the vibrancy of town centres. All development must make a positive contribution to the townscape and interface well with street level activity. Where a new non-retail use is introduced within a town centre frontage it will be required to provide an active frontage, preferably associated with the use itself and where this is not suitable through a window display or other feature creating visual interest.
- 8.86. Within town centres proposals for residential uses on ground floor or basement levels are not appropriate and will be resisted. This is owing to the detrimental impact these uses can have on the vitality and viability of the town centre, along with the character of the townscape. Impacts include the introduction of harmful breaks on the continuity of frontages and, where conversion is considered, the loss or compromising of existing space for commercial and related town centre uses.

## EC 15 Local Centres

- A. All new development within Local Centres must support the vitality and viability of the centres and make a positive contribution to their local character. Development proposals will be required to submit a statement to demonstrate how the use is appropriate to its location and will provide for a beneficial mix of uses within the centre.
- B. Class A1 (retail) uses, with smaller and moderately sized units, are encouraged to locate in Local Centres. Where such provision already exists, this should be protected in order to ensure a balanced mix of shops and complementary services, community and cultural facilities. Development proposals involving the loss of Class A1 retail uses will only be supported where:
  - a. It is demonstrated through a marketing exercise, of a minimum continuous period of six-months, that there is no reasonable prospect of retaining the unit in retail use;
  - b. The replacement use is an appropriate main town centre, community or employment generating use; and
  - c. An active frontage is provided or where this is not suitable a window display or other positive frontage.
- C. Proposals for the change of a main town centre use to a residential use at the ground floor level or below will be strongly resisted, and only acceptable where:
  - a. It is demonstrated through a marketing exercise, of a minimum continuous period of two-years, that the unit has been vacant during this time and there is no reasonable prospect of retaining it in an appropriate main town centre, community or employment generating use; and
  - b. There would be no adverse impact on local area character, including the continuity of the shopping frontage.

### Explanation

- 8.87. Local Centres complement Lewisham's larger Major and District Centres. They play an important role in providing a range of shops and services that meet the day-to-day needs of residents and others within the Borough. Local centres are particularly important for less mobile members of the community, including the elderly and people with mobility issues, who may be not be able to visit larger town centres on a regular basis.
- 8.88. We have reviewed the Borough's existing network of Local Centres and shopping parades, taking into account the number of units and mix of uses within them, their local function and the need for provision to support the levels of growth anticipated over the plan period. This research suggests that there is scope to consolidate and increase the number of centres, as reflected in **Table X** (Town centre network and hierarchy) and the Policies Map. A number of new Local Centres have been designated by elevating their status from shopping parades. This is because they exhibit a critical mass of business units with a mix of town centre uses, host a key community facility as an 'anchor' attracting visitors and are relatively accessible to the local catchment.

- 8.89. Development proposals for retail uses consisting of smaller and moderately sized units and floor-plates are encouraged to locate in District Centres. Where such shopping provision already exists, this should be protected in order to ensure that centres accommodate a balanced mix of uses. We will seek to prevent against the loss of retail units in these locations, whilst providing a measure of flexibility to take account of viability, and to allow centres to adapt in response to local demand. Where proposals involve the change of use away from a Class A1 retail use, they should provide sufficient evidence to demonstrate that suitable alternative provision is easily accessible nearby. This is particularly in respect of more essential day-to-day services, such as grocery shops and chemists.
- 8.90. Active frontages are vital to maintaining the vibrancy of Local Centres. All development must make a positive contribution to the townscape and interface well with street level activity. Where a new non-retail use is introduced within a frontage it will be required to provide an active frontage, preferably associated with the use itself and where this is not suitable through a window display or other feature creating visual interest.
- 8.91. We will strongly resist the conversion of main town centre uses at the ground floor or below to residential use. This is in order to protect the function of Local Centres and the character of their townscape. Only where it can be demonstrated through an active marketing exercise that there is no continued demand for the existing or an appropriate alternative use will proposals be considered. Viability will then be considered in combination with impact on the continuity of frontages and local character. Development that results in a 'harmful break' will not be supported. This will be considered on a case by case basis, but generally refers to the introduction of a use that detracts from the continuity of a publicly accessible and active frontage, and is incoherent with the prevailing streetscape and townscape.

## **EC 16 Shopping parades, corner shops and other service points**

- A. Class A1 (retail) uses located at shopping parades, corner shops and other service points (i.e. outside Town Centres and Local Centres) provide important day-to-day provision for Lewisham's neighbourhoods and should be protected wherever possible. Development proposals involving the loss of Class A1 retail uses at these locations will only be supported where:
- a. It is demonstrated through an active marketing exercise, of a minimum continuous period of six-months, that there is no reasonable prospect of retaining the unit in Class A1 retail use;
  - b. Similar alternative provision is available within a comfortable walking distance, normally within 400-800 metres;
  - c. The replacement use is an appropriate main town centre, community or employment generating use; and
  - d. An active frontage is provided or where this is not suitable a window display or other positive frontage.
- B. Outside of Town Centres and Local Centres, proposals for the change of a main town centre use to a residential use at the ground floor level or below will be resisted, and only acceptable where:

- a. It is demonstrated through an active marketing exercise, of a minimum continuous period of one-year, that the unit has been vacant during this time and there is no reasonable prospect of retaining the unit in an appropriate main town centre, community or employment generating use; and
- b. There would be no adverse impact on local area character, including the continuity of the shopping parade or other frontage.

### **Explanation**

- 8.92. There are a number of shops located outside of the designated Town Centres and Local Centres. These are dispersed across the Borough in shopping parades, at corner shops and other locations. These shops support Lewisham's communities by offering easily accessible goods and services and help cater to the essential day-to-day needs of residents, workers and visitors, including those with mobility issues. These shops are distinguished from units in out-of-centre retail parks and large format retail warehouses, such as at Bell Green Retail Park, which are dealt with elsewhere in the Local Plan.
- 8.93. Given the context of growth within the Borough and future demand for retail provision, we will seek to ensure that shops outside of centres are retained wherever possible. Proposals involving the change of use will only be considered where it is demonstrated through a continuous marketing exercise, covering a minimum period of six-months, that the existing or alternative retail use is not viable. Marketing must reflect a realistic and competitive price appropriate to the local area, with preference given to the use of agents with local or specialist expertise. Furthermore, changes of use will only be appropriate where it can be shown that there is similar alternative provision available locally, normally within 5 to 10 minutes walking distance (roughly 400-800 metres). In terms of alternative provision, some flexibility may be applied where the use in question provides a bespoke offer which is not necessarily an essential good or service, such as a wine merchant or chocolatier. Where these requirements are satisfied, we will support proposals for alternative employment generating or community uses that are compatible with the local area.
- 8.94. Out-of-centre shops and facilities are facing significant pressure for change of use, particularly to housing, given the improving residential land values in the Borough. However the introduction of residential uses within shopping parades and other local service destinations can compromise both their functional integrity and townscape value. We will therefore seek to ensure that all reasonable efforts have been made to actively market units for other employment generating or community uses, before giving consideration to residential uses. In this instance, marketing should cover a minimum continuous period of one-year.
- 8.95. All changes of use must maintain the continuity of shopping or other frontages in the locality. We will resist proposals that result in a harmful fragmentation of shopping frontages, either individually or by virtue of their cumulative impact. Additionally, development proposals will not be supported where they fail to make a positive contribution to local character, consistent with other Local Plan policies. Ground floor residential development, in particular, has the potential to interrupt

the established rhythm of the streetscape and townscape in neighbourhood shopping parades.

## EC 17 Concentration of uses

- A. All development should contribute to the delivery of mixed and balanced communities, including by supporting the vitality and viability of the Borough's town centres. Proposals will be resisted where they result in a harmful overconcentration of night-time activities, hot food takeaways, betting shops and associated uses, and financial and professional services (including payday loan shops and other similar uses).
- B. The concentration of uses will be assessed having regard to the number of units within a 400 metre radius of a proposed development site. Applications must be accompanied by sufficient information to allow for an assessment of concentration and potential impacts arising from the use.

### Hot food takeaways

- C. Proposals for hot food takeaways (Use Class A5) will only be supported where it is demonstrated that:
- They will not result in a harmful overconcentration of uses, having regard to (A) and (B) above;
  - They are located at least 400 metres away from the boundary of a primary or secondary school; and
  - The proportion of takeaways in the shopping frontage complies with the thresholds set out in **Table X** below.

Location	Threshold applied
Primary or secondary School	400m away from school boundary
Major / District Centre	Proportion of A5 uses does not exceed 5% of units
Local Centre	Proportion of A5 uses does not exceed 10% of units
Shopping Parade (20 units or more)	Maximum of 2 units in A5 use
Shopping Parade (19 units or less)	Maximum of 1 unit in A5 use

### Food and drink services

- D. All development proposals for uses involving the service of food and drink must make adequate arrangements to protect the amenity of adjoining and neighbouring properties, in line with [Policy QD9 \(Amenity\)](#).
- E. Where proposals for uses involving the service of food and drink are acceptable in principle, a condition will be sought requiring the operator to achieve and operate in compliance with the Healthier Catering Commitment Standard.

## Explanation

- 8.96. Lewisham, like other inner-London Boroughs, features areas that are densely developed and where a wide range of uses are located in close proximity to each other. As the Borough continues to grow and develop in the future, it is important

that its communities can benefit from an appropriate mix and balance of uses. The Local Plan seeks to carefully manage the location of uses recognising that excessive concentrations of particular uses can have harmful impacts, including on the liveability of residential areas, the vitality of town centres and the well-being of the local population.

- 8.97. Development proposals that are likely to result in a harmful concentration or saturation of similar uses in a locality, including within town centres, will be resisted. This is particularly in respect of night-time economic activities (including nightclubs and bars), hot food takeaways, betting shops and associated facilities (such as adult gaming centres), and some financial and professional services (particularly payday loan shops and pawnbrokers). However, proposals for all uses will be considered on their individual merits.
- 8.98. Proposals will be assessed having regard to the nature and scale of development, servicing requirements, operating hours, security and community safety, transport and other amenity impacts, along with compatibility with local character. We will consider if a proposal is likely to result in a negative impact on the surrounding area, whether on its own or cumulatively in combination with other similar uses. A 400 metre radius, established as a straight line distance from the proposed site, is considered an appropriate range from which to assess impacts. This measure is generally accepted as 5 minutes walking distance and provides a useful benchmark against which other similar provision could be easily accessed in the locality. We will have particular regard to the Borough's more deprived areas, where the impacts of some uses may be more pronounced.
- 8.99. Town centres are now accommodating a wider range of services and facilities that complement their traditional retail function. This extended offer includes food and drink establishments. These uses can play an important role in supporting town centre vitality and viability, such as by generating activity and providing opportunities for extended visits and linked trips. Food and drink establishments can also promote well-being, with provision of space for people to relax and socialise during the daytime and night-time. For these reasons we are broadly supportive of food and drink establishments. However we will seek to guard against excessive concentrations or clusters of uses where these threaten to undermine the liveability of local communities and the vitality of town centres.
- 8.100. Hot food takeaways are now recognised as an ongoing concern with respect to the wider systems approach to health and well-being. This policy helps give effect to the [draft London Plan Policy E9 \(Retail, markets and hot food takeaways\)](#), which encourages Boroughs to manage the concentration of such A5 uses.
- 8.101. Food and drink establishments regularly attract a high number of visitors and by virtue of their operation may give rise to environmental and amenity issues. Proposals will be expected to make adequate arrangements for operational requirements whilst ensuring protection of amenity. This includes consideration of litter, commercial waste disposal, fumes, noise, traffic and parking. Planning

conditions may be used to ensure there are no adverse impacts on local area amenity.

8.102. The Healthier Catering Commitment is a scheme that helps food businesses in London to provide healthier food to their customers. Hot food takeaways are often associated with unhealthy food, however it is accepted that other uses supporting the food and beverage industry also make provision for items that are high in calories, fat, salt and sugar and which could adversely impact on health outcomes. This includes A1 and A3 cafes, restaurants and coffee shops. To make it easier to access healthy food options in Lewisham, we will seek that operators achieve compliance with the Healthier Catering Commitment Scheme.

## EC 18 Culture and the night-time economy

### Cultural quarters

- A. Lewisham benefits from the presence of Cultural Quarters comprising local clusters of cultural, community and commercial activities. The following Cultural Quarters are designated in the Local Plan:
  - a. Deptford Creekside;
  - b. New Cross; and
  - c. Forest Hill.
- B. Proposals for cultural, community and commercial uses within Cultural Quarters will be encouraged and supported, having regard to other Local Plan policies. Development proposals should seek to retain or make appropriate re-provision to accommodate existing cultural, community and commercial uses where these make a positive contribution to the area. Development proposals that would adversely impact on the distinctive character and function of the Cultural Quarter will be strongly resisted.
- C. Temporary activities and meanwhile uses (such as festivals, markets, exhibitions, performances and other cultural events) will be supported within Cultural Quarters where these will not have an adverse impact on local amenity, public safety and the highway network or compromise the function of employment locations.

### Night-time economy

- D. Night-time economic activities should make a positive contribution to the communities within which they are located by:
  - a. Supporting the local economy through provision of a wide range of employment generating uses and jobs along with opportunities to carry out business beyond normal daytime hours;
  - b. Enhancing the vitality and viability of town centres;
  - c. Reinforcing local character and identity, and creating more inclusive communities, through provision of a locally distinctive and expanded leisure, cultural and entertainment offer; and
  - d. Protecting and improving local amenity.

- E. Proposals for night-time economic activities should be directed to appropriate town centre locations, giving priority to the following designated areas of night-time activity:
  - a. Areas with more than local significance:
    - i. Major centres of Catford and Lewisham;
    - ii. District centres of Blackheath, Deptford, and New Cross Gate;
    - iii. Local centre of New Cross Road;
  - b. Areas with local significance:
    - i. District centres of Deptford and Forest Hill.
- F. Proposals for night-time economic activities located outside of town centres will only be supported where it can be shown that the use will complement and not undermine existing venues in town centre locations.
- G. All proposals for night-time economic activities must demonstrate that they:
  - a. Will not result in an unacceptable impact on the amenity of properties in the immediate and surrounding area;
  - b. Will support town centre vitality and viability by ensuring an appropriate balance of uses, and will not result in a harmful overconcentration of uses, in line with other Local Plan policies;
  - c. Are located in places of good public transport accessibility with easy to reach Night Service transport options; and
  - d. Can be safely accessed during all hours of operation.

## **Explanation**

### Cultural Quarters

8.103. Lewisham benefits from the presence of its distinctive Cultural Quarters. These are local concentrations of cultural, community and commercial activities (particularly in the creative and digital industries). The Cultural Quarters reflect the unique character and diversity of the Borough, along with performing important economic and social functions. The designation of the Cultural Quarters helps to formalise and build on the existing character and uses within these locations. They reflect the presence of a mix of complementary uses, along with a key community anchor, such as an education or cultural institution. Further detailed policies for Cultural Quarters are set out in the character area section in Part 3 of the Local Plan.

8.104. We will seek to promote Cultural Quarters as an integral component of Lewisham's local economy and cultural offer. Development proposals for community, cultural and complementary commercial uses will be supported within these locations, having regard to other Local Plan policies. Cultural Quarters include Locally Significant Industrial Sites and it is vital that the functional integrity of the LSIS is secured and not compromised. Temporary activities and uses such as festivals, markets, exhibitions, performances and other cultural events will be supported within Cultural Quarters where they do not impact on local amenity.

## Night-time economy

- 8.105. The night-time economy refers to economic activity taking place between the hours of 6pm and 6am. Night-time economic activities cover a broad range of uses but typically concern leisure, cultural and entertainment venues associated with the Class A (retail) and D2 (assembly and leisure) Use Classes, along with some Sui Generis uses (such as night clubs). The London Plan considers the night-time economy a strategic priority and seeks to promote the Capital as a 24-hour global city in order to maximise opportunities for economic and cultural development. Lewisham is well placed to play a key role in this regard, with vibrant and diverse communities and town centres that can both anchor and benefit from night-time activities.
- 8.106. The **draft London Plan** identifies several categories of night-time economy clusters across the Capital. It recognises that Lewisham is host to several Major and District Centres that exert “more than local significance” in this function, including Lewisham, Catford, Blackheath, and New Cross. We also recognise the important role of the Deptford and Forest Hill in contributing to community vitality through their cultural and leisure offer. Accordingly, Deptford and Forest Hill District Centres will also be considered an appropriate location for night-time economic activities. For the most part these centres are located in Lewisham’s Creative Enterprise Zone where night-time economic activities will help to support and strengthen the Borough’s cultural capital.
- 8.107. Consistent with other Local Plan policies that support the town centre hierarchy, night-time activities should be directed to the above noted strategically important locations. Proposals in other town centres will be considered having regard to the nature and scale of the development in relation to role and function of the centre. Whilst we are broadly supportive of appropriately located night-time activities, we will seek to ensure that proposals do not result in excessive concentrations of uses that adversely impact on town centres and local amenity.
- 8.108. Proposals for night-time activities at out-of-centre locations are generally discouraged. They should only be taken forward when it is demonstrated through the sequential approach that no suitable town centre sites are available. This will help to avoid situations where clusters of activity develop cumulatively over time as these threaten to undermine town centres, as well as the viability of the established economic and cultural facilities within them. However, we will allow some flexibility for consideration of out-of-centre locations recognising these may be preferable in certain circumstances, such as where there are site constraints or to better manage particular impacts on local amenity. In these circumstances, we may use temporary consents so that we can monitor and review impacts over time.
- 8.109. Irrespective of site location all development for night-time activity must benefit from good public transport accessibility. This includes options for night-time public transport such as the Night Bus or Overground Night Service – the strategic clusters are already serviced this way. Proposals are also encouraged to

incorporate public realm treatments, including appropriate lighting, wherever possible in order to create a more attractive and legible environment. These measures will help to ensure that all visitors and workers can easily and safely access venues.

## MAP – STRATEGIC AREAS OF NIGHT-TIME ACTIVITY

### EC 19 Public houses

- A. Public houses are unique and integral features of Lewisham’s neighbourhoods and cultural identity, and perform important community, social and economic functions locally. There will be a presumption in favour of the retention of public houses in Lewisham. Development proposals involving the loss of a public house that has heritage, economic, social or cultural value to the community, including through change of use or redevelopment, will be refused unless there is robust and authoritative evidence to demonstrate that:
- a. Legitimate efforts have been made to preserve the facility as a public house, including through evidence of regular maintenance and upkeep, good management and through business diversification;
  - b. The public house is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use, in the foreseeable future as evidenced through attempts at different business models and management, and an active marketing exercise of a minimum continuous period of three-years; and
  - c. All feasible options for the re-provision of the public house have been fully investigated, and where these are not considered deliverable sufficient justification is provided.
- B. Development proposals affecting a public house, including its operational and ancillary amenity space, will be refused unless there is robust and authoritative evidence to demonstrate that the viability of the pub, and its current and future operation, will not be compromised and development will not detract from the character and appearance of the building, including any features of historic or cultural significance.
- C. Development proposals involving the replacement or re-provision of a public house must ensure the replacement facility is of comparable character and quality as the existing public house and has an appropriate amount and configuration of floorspace to enable the continued viability of the public house.
- D. Where the change of use of a public house is considered acceptable, development proposals will be expected to retain the building and other associated features where these makes a positive contribution to local character, including by their historic, streetscape and townscape value.

### Explanation

- 8.110. Public houses, or pubs, are a unique and integral feature of the British cultural identity of Lewisham. They are fundamentally community facilities that promote social cohesion, offering a welcoming environment for people of all backgrounds to socialise and interact. Many local pubs are heritage assets in their own right, or have played a part in the Borough's cultural and historical development. This may be reflected in their built form or through a pub's association with people or events that have shaped the Borough's history. Pubs often have longstanding ties to their neighbourhoods and strong affiliations with local communities and community groups, and therefore contribute to people's sense of place and belonging.
- 8.111. There are many different community functions that pubs can perform. For example, pubs often include amenity space which is used as venues for functions, performance space, and informal meeting space for residents and community groups. Pubs also support the local economy and are particularly vital to the visitor and night-time economy. In recent years Lewisham, like many other London Boroughs, has experienced a decline in public houses. Recognising the important social and economic role they play, we will seek to guard against the loss of these community and cultural facilities.
- 8.112. Development proposals involving the demolition or loss of an existing public house, including through change of use, must submit evidence to demonstrate that the pub is not financially viable and there is no reasonable prospect of the premises remaining in this use, or an alternative community use. We will expect to see full details of patronage levels and trading accounts over the past 3 years, including accounts from previous management where appropriate. In addition, applicants must provide a statement documenting the steps taken by the owner or operator to respond to viability concerns, including falling patronage levels and profit margins. This might cover considerations given to business diversification (for example, expanding the food and beverage offer), promotions or building refurbishment. Finally, proposals will need to provide proof of a marketing exercise covering a minimum continuous period of three-years, including details of commercial agents, advertisements and lease terms offered. During this time the pub must be actively marketing at a reasonable local market rent. We will consider whether any ties or restrictive covenants have affected interest. Proposals will be resisted where there is good reason to believe that the viability of the pub has been compromised by deliberate neglect or mismanagement.
- 8.113. Public houses require dedicated operational spaces. They also often feature function rooms or ancillary amenity space, including outdoor gardens, which are critical to supporting their role as community facilities and places of gathering. Where proposals involve a reduction or reconfiguration of such operational and ancillary spaces, it must be demonstrated that this will not have a detrimental impact on the financial viability of the public house. Furthermore, proposals must show that the remaining residual space will be of a sufficient amount and quality to continue to meet the needs of pub users. Operational and ancillary spaces include, but are not limited to, beer gardens, function rooms, kitchens, cellars and accommodation integrated into the building.

- 8.114. Where sites are redeveloped, including through comprehensive redevelopment, our priority is to protect pubs particularly where they are of historic, cultural or community interest. However, in certain circumstances it may be acceptable that a facility is replaced or re-provided. Proposals will be required to demonstrate that they have considered all reasonable options for retaining the pub in situ. Where this is not possible, the replacement provision must be designed to a sufficient quality and standard to ensure the continued viability of the pub. This aim of this policy is to ensure there is a genuine intention to retain the facility in viable use, so to prevent against future changes to alternative uses.
- 8.115. National planning policy recognises the value of public houses as community facilities. We will therefore seek to protect against their loss, having regard also to [Policy CI 1 \(Safeguarding and securing community infrastructure\)](#). Where the loss of a pub is proposed, proposals must suitably demonstrate that there is similar alternative provision elsewhere in the local area. If there is sufficient evidence to support that the loss is acceptable in principle, proposals will be expected to retain the building and any ancillary land or other features, where these makes a positive contribution to local character.
- 8.116. Development proposals involving the loss of public houses listed as Assets of Community Value will be assessed against this and other relevant Local Plan policies.
- 8.117. To support the implementation of this policy, we have set out marketing requirements for proposals affecting public houses in an Appendix to the Local Plan, which all proposals will be required to comply with, as appropriate.

## EC 20 Markets

- A. Development proposals should protect and seek to enhance existing markets. New markets or market spaces will be encouraged where they complement and support Lewisham's town centre network and hierarchy, along with the cultural vibrancy of the Borough.
- B. Proposals for new markets or market space should be directed to appropriate town centre locations. Where such provision is proposed outside of centres, proposals will only be supported where it is demonstrated that there are no suitable town centre sites available, with preference given to edge-of-centre locations, and they:
- Do not adversely impact on the vitality and viability of the town centre network and hierarchy;
  - Make beneficial use of vacant or underused sites;
  - Are located in areas of good public transport accessibility and can be accessed safely by visitors;
  - Can be appropriately accommodated on streets, where appropriate; and
  - Are temporary in nature.
- C. Proposals for new development affecting existing markets within town centres will be considered having regard to:

- a. The priority given to retaining markets as part of the town centre offer and ensuring appropriate re-provision of market space, where there is a demonstrable demand; and
  - b. The impact on town centre vitality and viability with particular consideration given to:
    - i. Provision of a range of premises and floorspace to support small and start-up businesses;
    - ii. Local character, including distinctive character of the market; and
    - iii. Public realm and townscape.
- D. All proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on the amenity of adjoining and neighbouring properties, or have a detrimental effect on the functioning of the local road network.

### **Explanation**

8.118. Lewisham is well served by local markets (including street markets, specialist and farmers' markets) that complement and support the vitality and viability of the Borough's town centres. These markets play a vital economic role by extending consumer choice and access to a wide range of goods and services as well as supporting employment, including through provision of local jobs and operating space for start-up, small and independent businesses. Markets also have an important social and cultural function. They serve as hubs for community activity and help to reinforce local identity and character. Some of Lewisham's markets, such as Douglas Way market in Deptford, have strong historical connections and are renowned for their unique offer, attracting visitors both from the local area and further afield.

8.119. Proposals for new markets and market space will be expected to apply the 'town centre first' principle of site selection. Markets should complement and support the vitality and viability of the Borough's town centre network and not compete with existing centres for trade. However it is recognised that site availability and other constraints may prohibit additional provision from coming forward. Further, there may be vacant or underutilised sites (such as those with planning consent but where development has not yet commenced) which offer interim opportunities for optimising the use of land in the Borough. We will therefore give consideration to out-of-centre proposals where it can be demonstrated the town centre hierarchy will not be compromised. Applications should detail how the goods and services provided will not undermine the offer in existing centres. Proposals in areas of low public transport accessibility are discouraged. Given the high levels of footfall markets attract it is important that visitors can easily and safely access them during their operating hours. Temporary consents will be used in order to ensure flexibility for assessment of impacts over time.

8.120. Where new development concerns or may impact on existing markets, proposals must demonstrate consideration to the safeguarding of market space including appropriate re-provision, having regard to any identified demand. Where market space is to be reconfigured or reduced proposals will be expected to show that

sufficient provision will remain to meet local needs for employment floorspace, particularly for small and start-up businesses. Development offers the opportunity to improve the functional and aesthetic quality of town centres and the market spaces within them. All proposals should seek to maintain and enhance the unique features of the market and its associated public realm where these make a positive contribution to local character. This is particularly important given the historical and cultural value of many of Lewisham's markets.

- 8.121. All proposals must make adequate arrangements to avoid or mitigate unreasonable impacts on the amenity of adjoining and neighbouring occupiers, and wider local area. This includes consideration of congestion on footpaths and the road network, refuse storage and collection, noise and odour. Proposals for street markets must demonstrate that there will be no detrimental effect on the functioning of the road network.

## EC 21 Visitor accommodation

- A. Local provision of visitor accommodation can help to meet the growing demand across London. Development proposals for new visitor accommodation will be supported where they are appropriately located within or at the edge of town centres, or other well-connected locations where there are good levels of public transport accessibility.
- B. Development proposals for new visitor accommodation should ensure a range of high quality provision in the Borough catered to the varying needs of visitors. Proposals will be supported where they:
- a. Do not result in the net loss of existing housing;
  - b. Are proportionate to their location in terms of size, scale and function;
  - c. Do not result in a harmful overconcentration of similar uses in the locality;
  - d. Provide a level of car parking that is appropriate to the site's public transport accessibility level, whilst seeking to minimise car parking wherever possible;
  - e. Ensure adequate access, drop off / pick up and servicing arrangements appropriate to the size and location of the accommodation;
  - f. Maximise pedestrian linkages and opportunities for walking, cycling and sustainable travel;
  - g. Demonstrate high quality and accessible design standards, with an adequate standard of amenity for occupants and provision of accessible accommodation, in line with **draft** London Plan requirements;
  - h. Make appropriate arrangements for long-term adaptability and sustainability; and
  - i. Demonstrate that an agreement is in place to secure an operator prior to the commencement of the development.
- C. Proposals for visitor accommodation should contribute to local area vitality by providing active ground floor frontages and incorporating ancillary uses and facilities that are accessible for public use, where appropriate.

- D. The council will seek to resist the use of visitor accommodation for permanent occupation. Proposals for serviced apartments will be expected to demonstrate appropriate management arrangements for their use as short-term accommodation (up to 90 days).

### **Explanation**

- 8.122. The visitor economy is an integral part of the local and wider regional economy. It provides residents with job opportunities, supports local businesses and helps to ensure the viability of cultural and leisure facilities. Lewisham boasts an array of leisure, cultural and historic attractions. The Borough is also within easy travelling distance of central London, making it a convenient base for visitors to explore the Capital. The **draft** London Plan estimates that an additional 58,000 bedrooms of serviced accommodation will be needed in London by 2041, and Lewisham has a role to play in meeting this demand.
- 8.123. For the purpose of this policy, visitor accommodation pertains to uses within the C1 Use Class including hotels, bed and breakfasts, traveller / youth hostels, short-term holiday lets and serviced self-catering apartments.
- 8.124. It is important that visitor accommodation contributes to sustainable communities. The location of visitor accommodation is important, particularly given the strategic objective to minimise reliance on car borne transport. We will encourage that new visitor accommodation is located where there is good public transport accessibility. This includes town and edge of centre locations, which are well suited to supporting visitors with a range of complementary facilities and services. Proposals for visitor accommodation outside of town centres will need to be sufficiently justified, for example, with evidence demonstrating a lack of availability of suitable sites.
- 8.125. Visitor accommodation, like all new development, must positively contribute to the character and setting of its site. The nature and scale of the accommodation should be proportionate to its surroundings, recognising the various typologies of visitor accommodation within the C1 use class. For instance, a large format hotel may be more appropriate at a prominent town centre location or at a key transport interchange, whereas a smaller scale boutique hotel or serviced apartment may be more sensitively integrated elsewhere in the Borough.
- 8.126. All visitor accommodation should be designed to a high quality standard. Proposals will be expected to positively respond to the local context, taking into account the distinctive features of the built, historic and natural environments. Particular attention should be given to the quality of materials. We will expect that new development is able to achieve accreditation by the National Quality Assurance Scheme.
- 8.127. Proposals will also need to demonstrate that the accommodation is both sustainable and deliverable. Through the Green Tourism for London programme, hotels should seek to reduce carbon dioxide emissions, water use and waste

generation. Speculative development will not be acceptable as the bespoke nature and requirements of hotel operators may result in the construction of visitor accommodation that does not serve their intended purpose and runs the risk of dereliction. Proposals for visitor accommodation will need to demonstrate that an operator will be identified and secured prior to the commencement of the development. This is necessary to guard against speculative hotel development for which there is no clearly established business demand, and which might preclude the use of land for more beneficial public uses.

8.128. Development will be expected to maximise opportunities to deliver active ground floor frontages and appropriate ancillary uses, particularly in town centre locations. This is important to ensure the visitor accommodation enhances and does not detract from local area vitality. Ancillary uses may include receptions, cafés and restaurants, conference facilities, salons, fitness studios and other space that can be made available for use by the local community as well as visitors using the accommodation.

8.129. In recent years the visitor economy has been bolstered by the growth in short-term serviced accommodation, often offering a more unique and affordable alternative to conventional hotel rooms. It is important that conventional housing supply is not compromised by unlawful use of residential premises for visitor accommodation. Therefore, proposals for serviced apartments will be required to provide details of a management plan, so to ensure rooms will not be occupied for periods of 90 days or more. The council will expect that the use is secured in the form of a licence and not a lease.

## EC 22 Meanwhile uses

- A. Proposals for the meanwhile (temporary) use of vacant sites or units in town centres and designated employment areas will only be supported where the site or unit:
- a. Is being actively marketed; or
  - b. Falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term; and
  - c. The meanwhile use sought:
    - i. Is appropriate to its location, with priority given to suitable employment generating, community or cultural uses;
    - ii. Will not adversely impact on the amenity of adjoining and neighbouring occupiers, in line with the Agent of Change principle (Policy QD 9);
    - iii. Does not preclude the permanent use of the site for appropriate commercial or main town centre uses, or prohibit delivery of the site allocation; and
    - iv. Will be temporary in nature.
- B. Proposals for the meanwhile (temporary) use of vacant land and buildings outside of town centres and designated employment areas will be considered on a case-by-case basis, having regard to their contribution to supporting the Borough's spatial strategy and compliance with other Local Plan policies.

## Explanation

- 8.130. Vacant premises and sites can have a detrimental impact on the vitality and viability of places. This is especially in town centre locations where vacant units can visually detract from local character and result in lower levels of footfall. The Local Plan seeks to optimise the use of land in the Borough including by ensuring that land and buildings do not go unnecessarily unused. We will therefore give consideration to meanwhile (temporary) uses of vacant units or sites, particularly where they support beneficial uses that might not otherwise have site opportunities available. This includes uses that support business development, community activities and those that help to address acute specialist, local housing needs.
- 8.131. Where meanwhile uses are proposed, applicants must submit evidence to demonstrate that the vacant unit or site is being actively marketed, including during the period of meanwhile activity, at market rates that are reasonable to the local economic area. The intention here is to ensure that sites or units are taken up for their intended use whilst recognising some flexibility is needed to respond to fluctuations in the market or other factors. If we consider that a site or unit has been made deliberately vacant in order to secure a temporary consent, the application will be refused.
- 8.132. The Local Plan includes a number of strategic site allocations, some of which are expected to come forward over the medium to long-term. Our priority is to ensure that development is delivered as quickly as possible. However, there are circumstances where site allocations may take longer to be realised, such as when development is phased or time is needed to allow for coordination between different landowners. In the interim period we are keen to ensure that active uses are maintained wherever appropriate. Place Ladywell is a successful example of a temporary use in the Lewisham town centre area, where an innovative modular mixed-use scheme was consented for a fixed period. This meanwhile use provided local provision of specialist accommodation and workspace, and has now been re-located to enable comprehensive redevelopment in line with the site allocation. The scheme has been recognised with several planning and design awards.
- 8.133. All proposals for meanwhile uses must not preclude the future permanent occupation of the site or unit for an appropriate main town centre, commercial or other use. Further, in line with other Local Plan policies, we will expect that meanwhile uses do not have an adverse impact on the amenity of neighbouring properties. Where located in town centres or employment areas, meanwhile uses must not compromise the employment generating function of nearby sites in line with the Agent of Change principle.
- 8.134. To encourage meanwhile uses, the council may consider the future use of Local Development Orders (LDO) allowing temporary uses in specific locations subject to certain conditions being satisfied.

8.135. Where meanwhile uses are approved they will be considered for monitoring purposes. This includes meanwhile residential uses, where conventional units and non-conventional bedrooms will be counted towards the Borough's housing target. This approach is consistent with that advocated in the **draft** London Plan.

## 9 Community infrastructure

### CI 1 Safeguarding and securing community infrastructure

- A. The council will work collaboratively with stakeholders to identify current and projected future requirements for community infrastructure, and to secure the necessary provision of this infrastructure. Need for provision in the Borough will be considered having regard to the Infrastructure Delivery Plan, along with the relevant corporate plans and strategies of its key stakeholders, including for healthcare, education, recreational and other community services.
- B. Proposals for major development will be expected to, and all other development should, plan positively to meet local area needs for community infrastructure. Major developments may be required deliver community infrastructure on-site, where feasible, particularly in those areas where there are acute deficiencies in facilities or services, as identified in the Infrastructure Delivery Plan.
- C. All development proposals should make the best of use of land, including the public sector estate. Innovative approaches to community infrastructure provision (such as the co-location of services, shared use of facilities and development of multi-use facilities) will be encouraged.
- D. New development will be supported where it safeguards and enhances community infrastructure. Where development would result in the loss of an existing community facility, or land and buildings formerly in community use, proposals must demonstrate that:
  - a. There is no current or future need for the existing or an alternative community use, including evidence of an active marketing campaign for the site covering a minimum continuous period of twelve months, and there is adequate alternative provision elsewhere to serve the needs of the area; or
  - b. Replacement provision of an equivalent or improved standard, including in terms of design quality and functionality of use, is proposed to serve the needs of the area; or
  - c. The development is directly associated with a public service transformation programme and necessary to enable or sustain the delivery of service improvements and related investment in community infrastructure.
- E. In exceptional circumstances, where there requirements of (D) above cannot be satisfied, consideration will be given to the use of payment-in-lieu contributions.

Proposals will be expected to provide evidence to demonstrate that the existing or an appropriate alternative community use is not viable.

### **Explanation**

- 9.1. Community infrastructure is also commonly referred to as social infrastructure. It covers a range of services and facilities that contribute towards inclusive and sustainable communities by providing residents and visitors with opportunities to enjoy a good quality of life. Community infrastructure includes provision for health services, education and training, community facilities (including public houses), places of faith, and sport and recreation facilities for people of all ages and abilities. Green infrastructure is also a component of social infrastructure, although it is addressed separately in this Local Plan.
- 9.2. Community infrastructure is essential to supporting inclusive communities along with enabling healthy lifestyles, providing vulnerable people with support and care, and giving children and young people the best start in life. We will therefore ensure that community infrastructure is safeguarded where there is a strategic or local need for it, having particular regard to Lewisham's growing population and the different requirements of the groups within it. At the same time, it is important that opportunities are taken to improve or replace existing infrastructure in order to ensure that facilities within the Borough are maintained at a good modern standard.
- 9.3. New models of community infrastructure provision (such as multi-use and shared use facilities, or co-location of uses) can enable the consolidation or reconfiguration of services, which in turn can provide opportunities to make better use of land and assets. However, any such process to consolidate or reconfigure services, including the disposal of surplus or redundant assets, will need to be carefully managed. It is essential that the Borough's community infrastructure capacity is not compromised and that essential facilities and services are not unnecessarily lost, particularly where there is a demand from a growing population.
- 9.4. Where replacement community infrastructure is proposed applications must include a statement explaining how the new provision will result in demonstrable improvements, both in terms of design quality and functionality of use. This should include an assessment of the existing facility giving consideration to factors such as building condition, flexibility of use, amenities, safety, accessibility and current usage. If the replacement provision is proposed at a different site, applications should clearly set out the reasons why this is necessary and how local area needs will continue to be met. We will seek that new provision does not result in a net loss of floorspace for community use. However some flexibility may be applied where it can be shown that a reduction would not compromise the delivery of services or provision of facilities.
- 9.5. Assessments will be required to justify the loss or transfer of community infrastructure within the Borough. The starting point for any such assessment should be the Infrastructure Delivery Plan (IDP) and, depending on the nature of uses involved on individual schemes, relevant key plans and strategies, whether from the council or its partners. Unless the development proposal is demonstrably associated with a public service transformation programme, in line with Policy C11.D(c) above, applications must be also accompanied by evidence of an active marketing exercise, normally for a minimum continuous period of 12 months. This should take into account the type of provision involved, its condition and site location. The loss of

community infrastructure will be strongly resisted where these requirements cannot be satisfied.

- 9.6. The loss or a change of use of existing community infrastructure will be acceptable where it is clearly demonstrated that the disposal of assets is directly associated with a service transformation programme and necessary to deliver investment in public infrastructure and related services. Applicants will be required to demonstrate through this programme that the facility in question is surplus to requirements or unviable in its current format, and that adequate provision will remain available to meet the needs of the local population. Where the public estate is involved, marketing information will not normally be required. The council will continue to engage with key stakeholders in health, education and other areas to ensure that key corporate programmes and priorities are reflected in the Infrastructure Delivery Plan, so that needs for provision can be appropriately identified and planned for.
- 9.7. In limited and exceptional circumstances, where it is suitably demonstrated that the requirements of (D) above cannot be satisfied we may consider payment-in-lieu contributions. In these circumstances, we will require a statement clearly justifying why it is not feasible to re-provide the infrastructure, whether on-site as part of the redevelopment or off-site in kind. Where a loss is judged to be acceptable by the council, payments will be negotiated on a case-by-case basis having regard to the type of provision in question, with contributions being invested in community infrastructure improvements within the Borough. Further details will be set out in an update to the council's Planning Obligations SPD.

## CI 2 New and enhanced community infrastructure

- A. Development proposals for new community infrastructure, or the alteration, extension or reconfiguration of existing facilities, will be supported where:
- a. The site and building is appropriately located for the intended use and is easily accessible by public transport, walking and cycling;
  - b. The development has been designed to maximise the flexibility and adaptability of space to accommodate a range of community uses and users, wherever practical and feasible;
  - c. The development includes provision of well-integrated facilities that enable it to effectively function as a community use, such as meeting spaces, kitchen facilities, toilets and dedicated storage space;
  - d. The facility is made available for use by the public as much as reasonably practical, and does not unreasonably restrict access to the wider community;
  - e. There are clear arrangements to ensure the facility will be appropriately managed and maintained to an acceptable standard; and
  - f. There is no significant adverse impact on neighbouring uses and the surrounding area (including amenity, traffic, parking and safety impacts) consistent with other Local Plan policies.

### Explanation

- 9.8. Community infrastructure is vital to securing inclusive communities and to meeting the needs of different groups within the Borough. We will therefore be broadly supportive of proposals involving new or enhanced provision. Facilities and services

should be easily accessible by walking, cycling and public transport. Applicants are encouraged to give priority to town and local centres in the site selection process. However other locations will be considered on an individual basis, recognising that some uses may not be ideally located in centres owing to space constraints, site availability or other requirements specific to the community service or facility. All proposals will be expected to demonstrate that the proposed site location is appropriate to the community and group(s) it is intended to serve. This includes consideration for the development's functional relationship and compatibility with adjoining and neighbouring uses.

- 9.9. All proposals for community infrastructure, whether new build or changes to existing facilities, will be expected to investigate opportunities to incorporate design features that allow for flexibility and adaptability of use over the lifetime of the development. These design features should be implemented wherever practical and feasible. It is important that consideration is given to the use of space in accommodating a wide range of uses and end users. Service providers and developers are encouraged to engage with each other and to refer the council's Infrastructure Delivery Plan to identify whether there are opportunities for co-location or shared use of facilities. In addition to enhancing the overall functional integrity of the facility, such interventions can help to support the viability of community infrastructure by making it more adaptable to changing needs over the long term.
- 9.10. Community facilities must be designed to a high quality standard. They should be accessible and inclusive places that help to promote social cohesion. Development proposals will be expected to include well-integrated facilities that enable the effective use of the building as a community space. This may include kitchen areas, toilets and washing facilities, communal areas and meeting spaces, and generous dedicated storage space. We will resist proposals that do not suitably demonstrate that full consideration has been given to the main community function of the development, or the elements within the development intended for community use, through the design-led process.
- 9.11. Applicants are encouraged to investigate opportunities for the shared use of facilities. This will help to ensure that a wide range of individuals and community groups can benefit from provision in the locality, and that facilities are not underused particularly during non-peak hours. Where facilities are integrated into new development, for example in major residential development schemes, these should be made as accessible as reasonably practical. We will resist proposals for facilities where these unreasonably restrict access, for example, for reasons of resident tenure. A statement setting out arrangements in respect of site management and maintenance should accompany proposals, and the council may require a Management Plan prior to occupation.

### CI 3 Play and informal recreation

- A. All people, and particularly children and young people, should have access to a wide range of opportunities for play and informal recreation with facilities that can be reached safely and easily. Development proposals that are likely to be occupied or used by children and young people should seek to increase opportunities for play and informal recreation, particularly in areas where there are identified deficiencies in provision.

- B. New housing development will be expected to incorporate well-designed and high quality formal play provision of at least 10 square metres per child. Provision should be provided on site and made accessible to all children in the development irrespective of housing tenure. Off-site provision will only be acceptable in exceptional circumstances, where it can be suitably demonstrated that delivery of play provision on site is not feasible and residents of the development will not be adversely impacted. Off-site provision will be required to be provided in line with the council's Planning Obligations SPD.
- C. All new play space and provision for informal recreation should be sensitively integrated into the site and locality, and be designed and managed to:
- Ensure the provision is free to use, with unrestricted public access;
  - Provide a stimulating and pleasant environment that enables users of different ages and abilities to move around and play independently;
  - Help ensure the safety of children and young people, including through layout and design features that allow for informal community supervision;
  - Integrate natural features such as trees, landscaped play areas and other greening measures; and
  - Maximise the use of permeable surfaces.
- D. Where large-scale public realm is provided as part of a development proposal, this should incorporate incidental play space to make the public realm more playable. Incidental play space should supplement formal play provision elsewhere in the Borough and provide additional opportunities for physical activity in the urban environment.
- E. Development proposals that result in the net loss of existing play space will be strongly resisted unless:
- Replacement provision of at least an equivalent size and improved quality will be provided, either on the site or in its vicinity, to meet the needs of children and young people in the locality; or
  - It can be suitably demonstrated that the loss would not result in a shortfall of provision in the locality, having regard to existing and projected future need.

### **Explanation**

- 9.12. We are committed to ensuring that children and young people in Lewisham are given the best start in life. In order to achieve this objective it will be necessary that an abundance of opportunities are available for play and informal recreation. Safe and stimulating play is essential to childhood development. It can positively impact on physical health with particular benefits in helping to address and prevent childhood obesity, which is a key issue in Lewisham. Play is also important to mental health and wellbeing as it provides opportunities for learning and social interaction at the early stages of life.
- 9.13. The Lewisham Open Spaces Assessment (2019) undertook an audit of formal play provision in the Borough by looking at the various types of existing provision suited to different age groups. The study concluded that whilst there is satisfactory

provision across the Borough there are deficiencies present in some areas, most notably to the south-east of Catford.<sup>24</sup> All new development should therefore investigate and seek to increase opportunities for play, including by enhancing existing provision, particularly in areas where there are deficiencies. This includes consideration for the types of provision required by different age groups.

- 9.14. New residential development schemes will be required to provide formal play space of at least 10 square metres per child in order to address child occupancy and play space requirements generated by the development. This benchmark is consistent with that set out in the **draft** London Plan. Provision should be proportionally based on the number of children expected to occupy the development and an assessment of future needs. The expectation is that provision will be delivered on-site. Only in exceptional circumstances should off-site provision be considered. Applicants will be required to provide evidence to demonstrate that delivery on-site is not feasible and the needs of existing residents will continue to be met. Normally, off-site provision will be more appropriate for older children and young people as they are able to travel slightly longer distances. As well, suitable play provision for this group might not be compatible within the development and could be better provided elsewhere, for example, as with skateboard parks. Additional details on the application of this policy and the benchmark requirement are set out in the council's Planning Obligations SPD and relevant London Plan supplementary planning guidance.
- 9.15. All new play space should be designed to a high quality standard. It should also be sensitively integrated into the site and its surrounds. Play space should be central to the design-led process with careful consideration given to the specific play requirements of the intended users. Applicants are strongly encouraged to integrate natural or semi-natural features into play space provision, including tree planting and landscaped play areas. Naturalised spaces provide for stimulating and pleasant environments. This is important in an urbanised setting like Lewisham, where it can be more challenging for children and young people to access biodiversity on a regular basis. Naturalised play spaces also help to reduce the need for hardstanding which is important for climate change adaptation and mitigation, for example, by reducing the heat island effect and enabling sustainable drainage.
- 9.16. To support inclusive communities we will seek to ensure that all play space is free to use and accessible to the wider public. We will strongly resist proposals that unreasonably restrict access to play space, for example, by fencing or other interventions designed to provide for exclusive access to residents of particular developments. It is recognised that play provision may need to be limited to regular daytime or early evening operating hours to protect the amenity of residents.
- 9.17. Activity and play need not be restricted to parks and other types of formal play spaces. Incidental play space can be provided where features of the urban environment are made more playable. This is particularly in areas with large-scale public realm (for example around town centres, stations and community facilities) where people of all ages are likely to visit. The design of the wider urban

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<sup>24</sup> The scope of the open space assessment only included play sites that are in ownership and/or management of Lewisham council. It is recognised that overall levels of play provision will also be influenced by private providers. The assessment provides a baseline position for applications to consider appropriate provision of play space in the locality.

environment should encourage children and young people to move around freely and independently in active ways. Therefore all development should give consideration to the design and configuration of spaces and buildings, and how these might function to impede or enhance safe access to play opportunities.

## MAP – PLAY SPACE DEFICIENCY AREAS

### CI 4 Nurseries and childcare facilities

- A. Development proposals for day nurseries and childcare facilities (including child minding, playgroups and related activities) must be appropriately located and designed having particular regard to:
- Accessibility by walking, cycling and public transport;
  - Impact on traffic movements and car parking including access, egress, cross-site movement and drop-off areas, with consideration given to needs of disabled users;
  - Protection of amenity of adjoining and neighbouring uses;
  - Local character; and
  - Provision of fit-for-purpose facilities to accommodate the intended use and all likely users, including suitable outside play space where appropriate.
- B. The use of residential floorspace for day nurseries and childcare facilities will only be supported where it is demonstrated that:
- The development does not result in the loss of a dwelling and the residual residential floorspace meets the requirements and standards for self-contained housing, as set out in elsewhere in the Local Plan;
  - The community use is ancillary to the residential use;
  - There is a specific local area need for the community use proposed; and
  - There are no suitable and available non-residential premises to accommodate the use.

#### Explanation

- 9.18. As with all types of community infrastructure, nurseries and childcare facilities should be appropriately located within the Borough. Priority should be given to well-connected and easily accessible sites, and where the impacts of additional movements arising from the use can be appropriately managed and mitigated. We will expect that applicants fully investigate opportunities to locate such uses in existing D Use Class premises, or other appropriate sites, before considering the use of existing residential premises. Where it is proposed to incorporate a nursery or childcare facility within an existing self-contained (C3 Use Class) property, this must not result in the loss of a dwelling unit, consistent with other Local Plan policies. In most circumstances a detached C3 use will be seen as more appropriate than a semi-detached unit, which in turn is preferential over a terraced dwelling. End of terrace locations will be treated the same as semi-detached properties. We may apply conditions to ensure residential uses are reinstated in any future change of use from a community facility.
- 9.19. Lewisham's Childcare Sufficiency Assessment (2016) provides a baseline assessment of early education and includes key priorities for the childcare market

in Lewisham. We are committed to ensuring that there is sufficient provision of good quality, affordable and flexible provision to accommodate the diverse needs of households within the Borough. All proposals for nursery and childcare provision should therefore engage with the most recently published assessment to identify opportunities for meeting demand and area specific requirements. Such evidence can help to support proposals where conversion of a self-contained dwelling is proposed.

- 9.20. It is important that nurseries and childcare facilities are designed to a high quality standard and are fit-for-purpose, meaning that they function to meet the needs of specific uses and likely range of users. All proposals will be expected to be accompanied by a statement setting out details of operations including: nature of activity; numbers of staff and visitors expected; days and hours of operation; access, parking and servicing arrangements; and measures to protect local amenity. Proposals will be resisted where the development is not sufficiently suited to meeting the needs of all users of the facility, or where it will give rise to significant adverse impacts on the local area.

## CI 5 Burial space

- A. The council will help to ensure that provision is made for the different burial needs of Lewisham's communities by maintaining existing cemeteries and ensuring access to existing spaces for new burials, where appropriate.
- B. Development proposals involving the provision of new burial space or related facilities must demonstrate that the provision:
- Adequately meets the requirements of the various groups within the Borough, including those groups for whom burial is the only option;
  - Is appropriately located and within close proximity to the community it is intended to serve; and
  - Identifies and appropriately responds to potential flood risk issues, including through the incorporation of mitigation measures.

### Explanation

- 9.21. Burial requirements vary amongst London's diverse communities and different faith groups. Community cohesion and integration can be undermined in the absence of suitable local provision. There is no statutory duty for the council to provide burial spaces however recognising the importance of providing opportunities for all individuals and communities to practice their faith, we have an interest in supporting provision to meet local needs wherever possible.
- 9.22. Information on burial space provision is drawn from Lewisham's Open Space Study (2019) and the Greater London Authority commissioned research report, An Audit of London Burial Provision (2011). There are four cemetery sites in Lewisham: Brockley and Ladywell, Hither Green, Grove Park, and Bromley Hill (which is run by Bromley council). The GLA audit concluded that Lewisham is in the 'adequate' category of capacity typologies. This is owing to the amount of reserve land in Lewisham's cemeteries, which indicates it is probable that demand for burial space

over the short to medium term can be met. We will therefore seek to protect the Borough's existing provision of burial space.

- 9.23. The council is currently in the process of carrying out a local assessment of burial space provision. This will support our ongoing monitoring of provision and assist stakeholders in planning positively to meet community needs. We will continue to assess capacity available to meet Lewisham's identified needs over the plan period, taking into account new planned provision and the impact of changes in legislation, including The Social Fund (Children's Funeral Fund for England) Regulations 2019.
- 9.24. Where capacity issues arise the re-use of existing spaces can assist in meeting demand and would be considered. The re-use of burial space is encouraged by the London Plan, following provisions set out in Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allowing for the re-use of graves in certain circumstances. The council will seek to ensure that any proposals for re-use of burial space comply with the statutory requirements and are sensitive to the site, its surroundings and the local community.

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# 10 Green infrastructure

## GR 1 Green infrastructure

- A. Lewisham's network of green and open spaces, waterways and green features (such as parks, street trees and residential gardens) make an important contribution to local character and heritage. They are also integral to supporting sustainable communities and healthy lifestyles, providing a wide range of environmental, social and economic benefits. Green infrastructure should be protected and opportunities taken to enhance provision across the Borough, including by enhancing or creating new links between green infrastructure.
- B. Development proposals will be expected to investigate and maximise opportunities for enhancing existing green infrastructure and creating new provision on site through the design-led process. Consideration should be given to the site setting within the wider landscape and the long-term management of green areas and planting. This includes provision of sufficient space where large canopy trees can be retained and new trees established without pressure for their future removal.

### Explanation

- 10.1. Green infrastructure refers to the network of green and open spaces, waterways, street trees, green roofs, public and private residential gardens, allotments and other assets, such as semi-natural and natural drainage features, across the Borough. It includes parks and public spaces as well as private gardens and other spaces with vegetation. Together these elements of the environment help to support strategic objectives across a number of policy areas such as: promoting public health and wellbeing, mitigating against and adapting to the impacts of climate change (including by reducing flood risk), improving air and water quality, and conserving natural habitats and species. A strategic approach to green infrastructure is necessary to ensure that green assets are planned, designed and managed in an integrated way. In London's metropolitan and heavily urbanised setting, it is important that green infrastructure is not considered in isolation of other features of the built environment.
- 10.2. Whilst the environmental value of green infrastructure is clearly evident its social and economic value is becoming increasingly recognised. Lewisham's Open Spaces Assessment (2019) includes information on the natural capital account, which considers the economic, social and environmental value of green infrastructure.<sup>25</sup> Research indicates that Lewisham currently enjoys benefits accruing from green infrastructure to a value of up to £2.1 billion, a figure that is

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<sup>25</sup> The Corporate Natural Capital Accounting (CNCA) is a methodology used to assess the social, economic and environmental value of green infrastructure, and was developed by the Natural Capital Committee in its report to the UK Government. It considers factors such as the costs of public inactivity, the value of recreational visits to green infrastructure, impact of green infrastructure on property values, and the value of the various environmental functions green infrastructure performs. See Lewisham's Open Space Assessment (2019) for further details.

comparable to the adjacent inner-London Boroughs. This helps to put into perspective the wider benefits of the local network of green infrastructure.

- 10.3. In addition, the protection and enhancement of green infrastructure in Lewisham is necessary to support the **draft** London Plan objective to make London at least 50% green by 2050, so that it can achieve National Park City status. Many of the Borough's trees are located in private gardens especially at the ends of rear gardens where combined garden areas provide the space for large canopy trees to develop and mature. These trees contribute to the Borough's urban forest providing rear outlook amenity, wildlife habitat, air pollution reduction, improved ground drainage, climate change mitigation and health and wellbeing benefits. Development proposals need to maximise opportunities to retain these trees for their ecosystem services and avoid compromising and encroaching available space for them, for example when considering rear extensions, the location of garden studios, when redeveloping whole sites and subdividing houses and gardens.

## GR 2 Open space and Lewisham's green grid

- A. Open spaces are integral components of Lewisham's network of green infrastructure and will be protected.
- B. Development proposals, particularly those located within areas that are deficient in open space, should maximise opportunities to introduce new publicly accessible open space and improve connections to existing open spaces. All major developments will be expected to incorporate publicly accessible open space unless it can be clearly demonstrated that this is not feasible.
- C. Development proposals involving the loss of open space will be strongly resisted. In exceptional circumstances the loss of open space will be permitted where replacement provision of at least an equivalent amount and better quality is provided within the local area catchment. All replacement open space must be publicly accessible.
- D. Development proposals involving the reconfiguration of existing open space will be supported where:
  - a. There is no net loss of open space and net gains are achieved wherever possible;
  - b. There is no detrimental impact on the environmental function of the open space, including support for nature conservation;
  - c. Demonstrable improvements in open space provision will be achieved, particularly in addressing identified deficiencies in the quality and quantity of open space in the locality and public accessibility to it;
  - d. The reconfiguration is delivered through comprehensive development, in line with a site wide masterplan, and will ensure a viable future for the open space.

- E. Development proposals for ancillary uses on open space (such as outdoor leisure facilities, outdoor play and fitness equipment, refreshment facilities, event space and public toilets) that help to improve the quality of open space and promote access to a wide range of users will be supported where they:
  - a. Are demonstrably ancillary to the use of land as open space;
  - b. Are necessary to facilitate or support the appropriate use of the open space;
  - c. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;
  - d. Positively respond to local character, including by maintaining or enhancing the visual quality of the open space and its setting;
  - e. Are of a scale and function that is proportionate to the nature of the open space; and
  - f. Are designed to a high quality standard, are accessible and inclusive to all, and do not detract from the amenity provided by the open space.
  
- F. Development proposals will be expected to maintain and enhance Lewisham's network of open spaces, including by improving access to and connectivity between these spaces. Priority should be given to measures that encourage walking, cycling and other active travel modes along routes that link open spaces such as the South East London Green Chain, Waterlink Way, the Thames Path and other local elements of the All London Green Grid.
  
- G. Development proposals located adjacent to open space should positively respond to the character of the open space and seek to protect and enhance the habitat value and visual amenity provided by it.
  
- H. Neighbourhood forums are encouraged to undertake detailed assessments to identify appropriate sites to designate as Local Green Space in neighbourhood development plans.

### **Explanation**

- 10.4. Open spaces form a vital component of Lewisham's infrastructure and particularly its network of green infrastructure. Open spaces, including waterways and water spaces, make a significant contribution to the character of the Borough. They also play a key role in supporting the physical health and mental wellbeing of the local population by providing opportunities for recreation and supporting active lifestyles. Lewisham benefits from provision of a wide range of good quality open spaces which total around one-fifth of the area of the Borough. They include urban green spaces, green corridors and a variety of public open spaces such as parks, cemeteries, churchyards, allotments and community gardens. There are also areas of Metropolitan Open Land which are designated through the London Plan.
  
- 10.5. As the Borough's population increases the pressure on existing parks and open spaces will invariably rise. The Lewisham Open Spaces Assessment (2019) considers the amount of open space that is needed to support the projected future population over the plan period, based on a fixed quantity standard. This suggests that a significant amount of additional provision will be required to maintain the standard over the long-term. Due to the finite availability of land and pressure to

accommodate new development, such as for housing and workspace, there will be limited opportunities to create new open space. It is therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced.

- 10.6. The Lewisham Open Spaces Assessment (2019) provides an overview of existing open space provision across the Borough and in neighbouring authorities. It includes an assessment of public access to these open spaces and identifies areas where there are deficiencies in access to certain types of provision. Whilst all development proposals should investigate and maximise opportunities to enhance open space this is particularly important in areas of deficiency. We will expect all applications to engage with the Open Spaces Assessment (2019), or any subsequent update, to inform the planning and design process. Furthermore, applicants should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on open spaces, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.
- 10.7. New development can help to enhance provision even where it is not feasible to deliver new public open space on site. Through the design-led process proposals should seek to create new routes or improve connections to existing spaces, including through public realm enhancements, particularly in areas of deficiency. Planning contributions towards open space provision may be sought, particularly where development is likely to increase pressure on existing provision in the local catchment area such through the introduction of more residential units and households. Contributions may include measures that support public access to open space, along with the functional quality and amenity value of it.
- 10.8. The reconfiguration of open space can be an effective approach to addressing deficiencies in the quantity and quality of provision. It can also help to overcome site constraints where it would otherwise be difficult to deliver new development, such as for housing, workspace or community facilities. We will therefore give consideration to proposals involving the reconfiguration of open space where they provide demonstrable improvements in the functional value of open and public access to it. In order to ensure certainty over the protection of open space and beneficial outcomes for the wider community, all proposals for reconfiguration must be delivered through comprehensive redevelopment and in line with a site-wide masterplan.
- 10.9. The London Mayor has prepared supplementary planning guidance on the All London Green Grid (ALGG).<sup>26</sup> The ALGG promotes the creation of a high quality and multifunctional green infrastructure network across London with the principal aim of supporting sustainable communities. The ALGG includes different types of open spaces, green corridors and the linkages between these (including wider public realm, corridors along transport routes, footpaths and cycle ways). The ALGG defines a number of Green Grid Areas across the region and Lewisham sits within the 'South East London Green Chain Plus' area. The Local Plan helps give effect to the ALGG and some of the key strategic objectives are reflected in the sub-areas section of this Plan. All development proposals will be expected to

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<sup>26</sup> Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. 2012. Mayor of London.

positively engage with the ALGG guidance in supporting a linked network of green infrastructure locally that improves public access to open spaces.

- 10.10. The NPPF provides scope for neighbourhood forums to designate Local Green Space through the neighbourhood plan process. National policy provides that Local Green Space is afforded the same level of protection as Green Belt land. Neighbourhood forums are well placed to identify high quality green spaces that are valued by the local community and whose protection could help to support Local Plan objectives. We will therefore encourage forums to undertake detailed assessments to support the designation of Local Green Space. It is recommended that all such assessments apply a robust methodology and are published as part of the technical evidence base. This will assist with public understanding of the proposals and support the plan examination process.

**MAP – OPEN SPACES**

**MAP – GREEN GRID**

**MAP – OPEN SPACE DEFICIENCY**

### **GR 3 Biodiversity and access to nature**

- A. Nature conservation sites will be safeguarded and protected in order to preserve or enhance priority habits and species, as well as to help ensure the public benefits from easy access to green spaces with wildlife value.
- B. Development proposals will be expected to identify and retain existing habitats and features of biodiversity value. They should also seek positive gains for biodiversity wherever possible, particularly in areas that are deficient in public access to nature conservation. Biodiversity should be fully integrated into the design-led process with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and management of buildings, spaces and their associated landscaping.
- C. Development proposals on sites that are within or adjacent to Sites of Importance for Nature Conservation, Local Nature Reserves, Ecological Corridors or other sites of special biodiversity interest must protect and enhance the nature conservation value of the site. Development that has a direct or indirect harmful impact, either individually or in combination with other development, will only be supported where it can be demonstrated through the following approach that:
  - a. The harm to the special biodiversity interest cannot be reasonably avoided;
  - b. Where avoidance is not possible, the proposal will minimise and mitigate the impact;
  - c. Appropriate compensation is provided in exceptional circumstances where the benefits of the development clearly outweigh the harm to the biodiversity interests.
- D. Development must not adversely impact on internationally designated nature conservation sites that are located outside of the Borough.

- E. All major development and other development proposals likely to impact on sites with special biodiversity interests must be accompanied by an Ecological Assessment carried out by a suitably qualified assessor.
- F. The council will seek to manage positively the nature conservation value of habitats and sites by:
  - a. Securing management plans, where appropriate, in order to ensure the achievement of conservation objectives; and
  - b. Positively engaging with stakeholders, including the Lewisham Biodiversity Partnership, to protect and enhance the Borough's open spaces and sites of conservation value.

### **Explanation**

- 10.11. Lewisham features a wide variety of important wildlife habitats and sites of biodiversity value. These include Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves and other areas of habitat value such as parks and open spaces, ecological corridors, waterways and incidental green space. It is imperative that wildlife habitats are protected and appropriately managed so that their special biodiversity value is maintained and, ideally, improved over the long-term. Protection is important not only to support nature conservation objectives but also to maximise the many other benefits associated with green infrastructure including the management of flood risk, air and water quality, and climate change adaptation and mitigation.
- 10.12. Growth and regeneration can be compatible with nature conservation objectives when development is considered in a holistic way. In order to deliver sustainable communities we will require that nature conservation is fully integrated into the site selection, design and development process. All development proposals should seek to protect habitats and species and further maximise opportunities to enhance biodiversity wherever possible. Applicants should refer the local Biodiversity Action Plan, "A Natural Renaissance for Lewisham", which sets out information on the vision and opportunities for the Borough in this regard along with details on priority habitats and species.
- 10.13. Access to nature is a key component of living in an urban environment as it offers opportunities for respite, relaxation and education. Lewisham residents generally benefit from good access to green and open spaces. However in some parts of the Borough people do not enjoy easy access to green spaces with wildlife value. Localities where people are further than 1 kilometre walking distance from a publicly accessible site of Metropolitan or Borough level significance for nature conservation are defined by the London Plan as 'areas of deficiency'. Lewisham has 5 such areas covering 14 per cent of the Borough. The largest of these is located in the northwest, spreading from the River Thames in the north to Brockley in the south and the boundary with Southwark in the east. The other four areas, which are smaller and more discrete, are located around Deptford, Forest Hill, Lee and Lewisham town centre. Where new development comes forward opportunities should be taken to introduce additional biodiversity features across the Borough, and particularly in the areas of deficiency. Further information is set out in the

Lewisham Re-Survey of Sites of Importance for Nature Conservation Study (2016). For development proposals, applicants should refer the deficiency maps developed by Greenspace Information for Greater London (GiGL). These are regularly updated taking into account the latest available information on nature sites, and use a method of accurately mapping areas of deficiency in public access based on actual walking distances along roads and paths.

- 10.14. All proposals will be expected to clearly identify biodiversity interests both within and in proximity to the site. They should set out how the development will positively respond to these interests whilst also demonstrating how harm will be avoided. In line with national policy, if significant harm resulting from a development cannot be avoided then mitigation measures will be required. This could include biodiversity offsetting or other measures to support implementation of Lewisham's Biodiversity Action Plan, which will be secured by way of planning obligations or planning conditions. Applications must clearly address why mitigation measures are necessary and any such mitigation must be agreed with the council in advance of the commencement of development. Mitigation measures should only be considered in exceptional circumstances. Proposals will be resisted where it cannot be suitably demonstrated that all reasonable efforts have been made to avoid harm to biodiversity interests at the outset of the site selection, design and development process.
- 10.15. Proposals for major development and other development with a potential to impact on the nature conservation value of sites, including designated sites with special biodiversity interests, will be required to submit an up-to-date Ecological Assessment. A suitably qualified ecologist, such as one registered with the Chartered Institute of Ecology and Environmental Management (CIEMM) will be expected to undertake this assessment. Surveys should be carried out during an optimal time of the year for observation. They must contain a sufficient amount of detail to identify and consider the relevant biodiversity interests and potential impacts on them. Applicants are expected to make surveys available to Greenspace Information for Greater London (GiGL) to assist in the collection of information in Lewisham and the region.
- 10.16. Lewisham does not contain any designated European nature conservation sites.<sup>27</sup> However there are 4 such sites within 15 kilometres of the Borough boundary which, given their proximity, have the potential to be impacted by development. These sites include the Lee Valley Special Protection Area (SPA) and the Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation (SAC). Where a development proposal has the potential to impact on a European site by virtue of its location, nature of use or scale, then applicants should consult Natural England to confirm whether a Habitats Regulations Assessment is required. Proposals that are likely to have significant adverse impacts on European sites will be strongly resisted.

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<sup>27</sup> Designated under European Union council Directive on the conservation of wild birds (79/409/EEC) 1992, European Union council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.

10.17. Development proposals may be required to be accompanied by a site management plan. This will normally be secured by way of planning condition. The need for a management plan will be established on a case-by-case basis taking into account the biodiversity interests on or in proximity to the site, as well as the nature and scale of development proposed. Management plans can help to ensure that habitats and species are not harmed during the construction process, and that site specific interventions and mitigation measures are fulfilling their objectives over the lifetime of the development, including through regular maintenance and monitoring. Applicants are strongly encouraged to liaise with local stakeholders, including the Lewisham Biodiversity Partnership, to discuss opportunities for support in this regard.

**MAP – DESIGNATED NATURE CONSERVATION SITES**

**MAP - AREAS DEFICIENT IN ACCESS TO NATURE**

#### **GR 4 Urban greening and trees**

- A. Development proposals should incorporate high quality landscaping and optimise opportunities for urban greening measures, including by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. Urban greening should be fully integrated into the design led-process with consideration given to the site setting within the wider landscape, as well as the layout, design, construction and long-term management of buildings and spaces.
- B. Development must positively respond to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.
- C. Major development proposals will be expected to increase green cover on site to achieve the target Urban Greening Factor (UGF) in the **draft** London Plan, unless it can be suitably demonstrated that this is not technically feasible. The target UGF score is 0.4 for predominantly residential development and 0.3 for predominantly commercial development. Existing green cover retained on-site will count towards the target score. Planning contributions may be sought where the target UGF is not achieved.
- D. Development proposals should maximise the use of living roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these features has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. Living roofs and walls will be supported where they are appropriately designed, installed and maintained. Proposals should have regard to the latest industry good practice guidance to help ensure that green roofs and walls are designed to maximise environmental benefits and will function effectively over the lifetime of the development.
- E. Development proposals should seek to retain existing trees, as well as the associated habitat with regard for the urban forest, and maximise opportunities for

additional tree planting and green infrastructure, particularly trees in characteristically urban settings such as streets. All proposals must suitably demonstrate that tree retention along with tree and other green infrastructure planting have been considered as part of the design-led process and the development will:

- a. Provide for the sensitive integration of all trees whilst ensuring any new or replacement on-site provision is of a high ecological quality (including appropriate species, stem girth and life expectancy) and positively contributes to the microclimate;
  - b. Protect veteran trees and ancient woodland;
  - c. Retain trees of quality and associated habitat, wherever possible, with appropriate arrangements to secure their protection throughout demolition, construction, and external works, to the occupation stage of development;
  - d. Avoid the loss of, and mitigate against adverse impacts on, trees of significant ecological, amenity and historical value;
  - e. Ensure building foundations are sufficient to be climate change resilient in proximity to trees; and
  - f. Ensure adequate replacement tree planting where the retention of trees is not reasonably practical, with replacement provision that meets the requirements of (a) above.
- F. Proposals involving the removal of protected trees (i.e. those covered by a Tree Protection Order and trees within Conservation Areas), or those that would have a detrimental impact on the health and visual amenity provided by protected trees, will be strongly resisted. The council may identify and seek to protect trees that are of a significant amenity, heritage, ecological, or other value through the development management process.
- G. Major development proposals, and where appropriate other development proposals, will be required to submit a Landscape Design Strategy and Arboriculture Survey to demonstrate that landscaping and other urban greening measures are appropriate to the site, can be implemented effectively and suitably managed over the lifetime of the development.

### **Explanation**

10.18. Urban greening is a term used to describe a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include, but are not limited to, tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening offers a number of environmental benefits including for biodiversity enhancement and climate change resilience, particularly by helping to reduce the urban heat island effect and flood risk. Greening can also enhance the character of areas and improve the visual amenity of spaces and buildings, and provide green corridors for connecting wildlife habitats, which is particularly important in a highly urbanised setting like Lewisham.

- 10.19. The **draft** London Plan introduces the Urban Greening Factor (UGF) requirement for major development proposals. The UGF is a model used to provide a baseline for the amount of green cover that development will be expected to achieve, taking into account various site development factors. We will apply the recommended interim UGF factors for major residential and commercial development as advocated by the **draft** London Plan. Existing green cover retained on site as part of a development proposal will count towards the target UGF score. Relevant major development proposals should meet and seek to exceed the target score. Some flexibility may be applied on a case-by-case basis where it is suitably demonstrated that the target cannot be achieved for reasons of technical feasibility or financial viability, in which case proposals should show that they have been designed to achieve the highest score possible.
- 10.20. Living roofs and walls will normally be required as part of the package of urban greening measures delivered on sites. They will be supported where they appropriately respond to local character and comply with other Local Plan policies. This includes consideration for the historic environment, where development must preserve the significance of heritage assets. Green roof assembly should as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and be installed on a waterproof membrane on an applicable roof. Buildings should be designed to have sufficient structural capacity and integrity to resist all loads for soil, moistures, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer. Green and living roofs should be designed in with photovoltaic panels. Proposals must demonstrate how the installation and maintenance will comply with the standards in the Green Roof Code of Best Practice for the UK 2014, or any national equivalent.

#### Trees

- 10.21. Trees and the urban forest are an integral part of the Borough's network of green infrastructure and have many beneficial functions. In addition to enhancing local character and amenity, including air quality, they provide extensive areas of habitat for wildlife, which is particularly important in an urbanised setting like Lewisham. Trees also have an important role in climate change adaptation and mitigation. For example, they reduce strain on drainage systems by absorbing rainfall and enable positive microclimatic effects through cover and shade. Recognising the significant environmental value of trees the **draft** London Plan sets out the Mayor's aspirations to increase tree cover in London by 10 per cent by 2050, which this policy provides support for.
- 10.22. Trees should be considered at the early stages of the planning and design process in order to maximise their many beneficial effects including on ecology, local character and amenity. Where proposals include elements of public realm we will require tree provision that is commensurate with the nature and scale of development. All proposals will be expected to retain and protect existing trees, ensuring they can be sustained over the long-term. This includes trees of quality which are Category A and B trees as defined by British Standard BS5837:2012

and also Category C & U trees within biodiverse habitat areas. New development should not result in an unacceptable harm to or loss of trees, particularly where these are protected by a Tree Preservation Order, are located in a Conservation Area or make a significant contribution to local ecology, public amenity and local character, including historic character.

- 10.23. Where it can be suitably demonstrated that the loss of a tree is acceptable, such as when the tree is considered dangerous to the public or where removal is necessary to secure site redevelopment consistent with the spatial strategy, then replacement planting will normally be required. We will prioritise on-site replacement unless there are exceptional circumstances that necessitate off-site provision, in which case planning contributions may be sought. When a financial obligation is required for replacement trees the value may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) or a similar methodology. Financial contributions will be expected to include on-going maintenance costs where trees are planted in the public realm.
- 10.24. New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases. Where new trees are to be planted, the species type should be chosen using the 'Right Place Right Tree' approach as advocated by the Mayor's London Tree and Woodland Framework. When purchasing trees, they should be responsibly sourced ideally from a domestic nursery with UK grown or imported trees appropriately quarantined for a minimum of one year within the UK before sale. This ensures plant health and non-infection by foreign pests or disease.
- 10.25. The council makes Tree Preservation Orders (TPOs) to protect specific trees or particular areas, groups or woodland with amenity value from deliberate damage and destruction. If a tree is subject to a TPO, consent will be required before any work that might affect the tree can be carried out. It is a criminal offence to prune, fell or damage protected trees without appropriate consent and the council will enforce breaches in accordance with relevant policy and legislation.

#### Landscape design strategy

- 10.26. A site's landscape and its relationship to existing and future development, and immediate surrounds, should be considered comprehensively from the start of the design-led process. Proposals should have regard to the existing character of the site including landform and features of the natural landscape (such as trees on or in proximity to the site). Where existing landscapes contribute to local distinctiveness, development should positively respond to those features. Applicants are encouraged to refer Lewisham's Characterisation Study as a useful starting point for understanding landscape features in the Borough.
- 10.27. A Landscape Design Strategy must be included with all major development proposals and proposals for sites where a Tree Preservation Order is in place. Other applications may also be required to provide this information having regard to individual site circumstances and the biodiversity interests involved. The Landscape Design Strategy will be expected to include an assessment of the relevant site features and nature conservation interests, details of work required to

ensure the successful implementation of the strategy, and a management plan. The management plan should address maintenance of hard and soft landscaping features over the lifetime of the development, with specific details covering a minimum 5-year period from occupation. Considerations may include: planting plans with species, frequency of maintenance operations such as weeding, irrigation and the use of hydration bags for trees, checking stakes and ties, plant condition, mowing times for long grass sward areas, materials and minimising hard surfacing, details of building subsidence and other liabilities such as climate change resilient foundations within zone of influence of trees, permeable surfacing and SUDs drainage, wildlife connectivity such as hedges for boundary treatment and hedgehog gaps when fencing is used, underground services and infrastructure in relation to root protection areas of existing trees and new tree planting areas, security and access arrangements to landscaped areas.

- 10.28. Arboriculture Surveys should be undertaken separately and help to inform the Landscape Design Strategy, where one is required. Surveys should provide details of existing species (with information on spread, roots and position of trees), details of trees affected by the development (including measures to be taken to protect retained trees during the construction process), and other plans for the positive management of trees. Plans and documents will be expected to be submitted in accordance with the British Standards 5837 (2012).

## GR 5 Food growing

- A. Allotments and community gardens will be protected in order to support sustainable food growing locally and to enhance opportunities for leisure, social interaction and education.
- B. Major development proposals for housing and proposals for community facilities are encouraged to include provision of space for community gardening and food growing. Where such existing provision exists and a site is to be redeveloped, this should be retained or re-provided.

### Explanation

- 10.29. Allotments and community gardens form part of the Borough's network of green infrastructure. They are an important resource for local food production, support biodiversity and promote sustainable communities, for example, by providing opportunities for recreation and social interaction. For children and young people food growing offers opportunities for education outside of the traditional classroom setting. Allotments and community gardens are invaluable to those who do not have access to a private garden and therefore help to promote more inclusive communities.
- 10.30. All major development proposals for residential and community uses are encouraged to incorporate provision for food growing. This should be considered early in the design-led process, so that provision is of a high quality standard, suitably meets the needs of the intended end users, and is accessible to people of

all ages and abilities. Consideration should also be given to the integration of ancillary facilities, such as storage space for equipment and connections to water sources, which are vital to ensuring that provision is convenient and useable.

## GR 6 Geodiversity

- C. The council will protect the Borough's geodiversity assets and seek to promote understanding of them by:
- a. Designating a Regionally Important Geological Site at Beckenham Place Park; and
  - b. Ensuring development proposals make a positive contribution to the protection and enhancement of geodiversity.

### Explanation

- 10.31. Geodiversity involves the many components that make up the landscape and its character. This includes physical features, such as rocks and soils, as well as the processes that help shape landforms such as erosion and sedimentation. An awareness of geodiversity helps us to understand our environment and how we can better adapt to it. As geodiversity is a natural resource that cannot be replaced or recreated it is important that geological interests are appropriately managed.
- 10.32. Informed by research prepared by the Natural England and the London Geodiversity Partnership, the London Plan identifies scope for the designation of a Regionally Important Geological Site at Beckenham Place Park, which the Local Plan takes forward. This RIG consists of a small portion of land near the park's entrance which is notable for its natural exposures of clay and sands, known as the Harwich Foundation. The exposure benefits from its location at either side of a Green Chain walk within the park where there is good opportunity for public access. We will protect the geodiversity interests at this site and promote appreciation and understanding of them, such as by supporting way finding signs, interpretative boards and public access improvements where appropriate.

**MAP – RIG BOUNDARY (See London's Foundations report, Site 3 in appendix)**

# 11 Sustainable design and infrastructure

## SD 1 Responding to the climate emergency

- A. Lewisham council has declared a climate emergency. In response to this a strategic and coordinated approach will be taken to ensure that the Borough contributes significantly to mitigating climate change and is made more resilient to its environmental, social and economic impacts. Local actions are both necessary and integral to supporting wider regional and national actions to address global climate change.
- B. To help ensure that the Borough develops in a way that is environmentally sustainable the council will:
- a. Help Lewisham to become a zero-carbon Borough as part of a zero-carbon London;
  - b. Designate, protect and seek to enhance a network of green and open spaces, as well as improve linkages to and between them;
  - c. Designate sites of importance for biodiversity, protect habitats and species within the local ecological network, and seek net gains in biodiversity wherever possible including through urban greening;
  - d. Implement measures to reduce flood risk and ensure resilience against the impact of flooding across the Borough, and seek to improve the quality of water bodies;
  - e. Ensure that new development does not adversely affect the amenity of the local population and habitats, including by mitigating impacts on and improving air quality in the Borough;
  - f. Help London to achieve net waste self-sufficiency by promoting the circular economy in order to increase the re-use and recycling of materials and achieve reductions in waste going for disposal.
- C. A plan, manage and monitor process will be used to support the successful transition to a zero-carbon Borough. This process will help to ensure that the Local Plan reflects the most current national and regional planning policy requirements and standards for carbon management, along with the council's latest technical evidence and strategies to deliver low and zero carbon outcomes.

### Explanation

- 11.1. Lewisham council is one of the first local authorities in the UK to declare a climate emergency.<sup>28</sup> This declaration has been made recognising that a changing climate will have severe and enduring social, economic and environmental implications, and that tackling climate change is an issue of inequality as the greatest impact will be on the most vulnerable and those least able to protect themselves. A strategic and coordinated approach to addressing climate change is necessary.

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<sup>28</sup> London Borough of Lewisham. Meeting of council on 27 February 2019. Motion 2 declared to be unanimously carried.

Collaborative action will need to be pursued by authorities at different levels and across administrative boundaries – in London, the UK and beyond – in order to realise significant positive gains in carbon reduction and to limit global warming.<sup>29</sup> At the same time it is imperative that Lewisham’s communities are made more resilient to the on-going effects of climate change. We are committed to accelerating action on climate change understanding that locally specific responses are urgently needed to help address this global issue in a meaningful way, and that local authorities will need to show more leadership in this regard.

- 11.2. The Local Plan will play an important role in helping the Borough respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaptation in respect of the future use and management of land within Lewisham. It also sets out policies to ensure that new development is designed, constructed and operated in a sustainable way. These policies cut across a number of topic areas, many of which are included in the following section, and reflect the complexity of matters that must be taken into account when planning positively for climate change resilience.
- 11.3. The **draft** London Plan sets a strategic objective for London to become a zero-carbon city by 2050, which we are committed to helping achieve. A plan, manage and monitor process will be used to support the successful transition to a zero-carbon Borough. We will regularly assess performance against our strategic objectives through the Authority Monitoring Report process. This will help to inform any necessary changes to our policy approaches. In addition, we will take the opportunity to regularly review policies to ensure they reflect the latest requirements and standards at the regional and national levels, also taking account of the council’s latest technical evidence and strategies. For example, we have committed to preparing a future Climate Change Action Plan and to investigate options and feasibility of becoming a zero-carbon Borough by 2030. Through the Local Plan review process we will seek to align any future corporate strategies and actions with the local planning framework.

## SD 2 Sustainable design

- A. Development proposals will be required to submit a Sustainable Design Statement. This should clearly set out how sustainable design principles have been integrated into the design-led process, including consideration of the construction and operation phases of development. The statement should be proportionate to the nature and scale of development proposed with a sufficient level of detail to demonstrate that the relevant policy requirements have been satisfied. For major development proposals the Sustainable Design Statement should refer and complement other detailed statements including for:
  - a. Landscape design and urban greening;
  - b. Nature conservation;

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<sup>29</sup> The United Nations Framework Convention on Climate Change (FCCC), Decision 1/CP.21, more commonly referred to as the Paris Agreement, seeks to limit global warming to 1.5 degrees Celsius from pre-industrial levels.

- c. Energy use and heat risk management;
  - d. Air quality;
  - e. Flood risk and water management;
  - f. Ground conditions; and
  - g. Waste reduction and the circular economy.
- B. Proposals for new self-contained major and minor residential development will be required to achieve the BRE Home Quality Mark.
- C. Proposals for major residential domestic refurbishment will be required to achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent.
- D. Proposals for new non-residential development of 500 square metres gross floorspace or more, including mixed-use development, will be required to achieve an 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or future equivalent.
- E. Development proposals for major non-residential refurbishment, including mixed-use development, will be required to achieve a certified 'Excellent' rating under the BREEAM Non-Domestic Refurbishment scheme, or future equivalent.
- F. Sustainable retrofitting measures to existing buildings and other development will be supported where they comply with other Local Plan policies, including on the historic environment.

### **Explanation**

- 11.4. A significant step change in the design quality and environmental performance of buildings and spaces is needed to achieve the Local Plan's strategic objectives, particularly for climate change adaptation and mitigation. Sustainable design principles should therefore be considered early in the planning and design stages and be fully integrated throughout the development process, including the construction and occupation stages. The principles cut across a number of topic areas within the Local Plan but are most predominant in the policies included in this section. All applicants will be expected to submit a Sustainable Design Statement explaining how the proposed development positively engages with these principles. The statement will be a key consideration in the determination of planning applications. It should therefore address the relevant policy requirements whilst taking into account the nature and scale of development. The statement should clearly identify the need for any site-specific mitigation and demonstrate that adequate measures will be delivered and effectively implemented.
- 11.5. The Home Quality Mark is a nationally recognised standard for new housing that has been established by the Building Research Establishment. It provides an indication of the expected health and well-being benefits and environmental footprint of new residential development. All proposals for new self-contained residential development should achieve the Home Quality Mark, as demonstrated through an independent assessment by a qualified assessor. Proposals are

strongly recommended to achieve a minimum 3 star rating and for developers and/or agents to make the Home Quality Mark assessment publicly available, for example, as part of any promotional material. Published ratings will also assist the council with monitoring implementation of the Local Plan policies.

- 11.6. Proposals for new non-residential development (including refurbishments) and non-self-contained housing will be expected to meet the Building Research Establishment Environmental Assessment Methodology (BREEAM) 'Excellent' standard. BREEAM provides a nationally recognised sustainable design standard for different types of development and covers a wide range of sustainability considerations. Applications for qualifying development are encouraged to submit BREEAM pre-assessments as part of the Sustainable Design Statement, identifying the credits to be targeted and measures to achieve these. All proposals will be considered having regard to individual site circumstances and the nature of development proposed.
- 11.7. For commercial and industrial uses applicants must justify that the required 'Excellent' rating cannot be reasonably delivered on-site, including through evidence of a BREEAM pre-assessment. It is recognised that for some types of developments the BREEAM requirements may pose particular challenges, for example, where there is no defined end-user and/or the council has agreed that buildings do not need to be fully fitted. However, our expectation is that shell only and shell and core proposals should be capable of meeting the BREEAM credits, taking into account the flexibility provided by the BREEAM methodology.
- 11.8. Sustainable retrofitting measures can help to improve the energy performance of existing buildings and minimise carbon emissions in the Borough. Even small-scale development, such as householder schemes, can incorporate measures that improve the environmental performance of buildings. This may include internal roof, floor and wall insulation, energy efficient fixtures, or urban greening. We will therefore broadly support sustainable retrofitting recognising the positive contribution this can play locally. It is important that all such proposals preserve or enhance the significance of heritage assets and their setting (such as Listed Buildings and buildings within Conservation Areas) in line with other Local Plan policies. Where heritage assets are concerned, applicants are encouraged to refer the latest Historic England guidance for further information.

### SD 3 Minimising greenhouse gas emissions

- A. Development proposals should help Lewisham to become a zero-carbon Borough by reducing greenhouse gas emissions in the operation stage and minimising energy demand (annual and peak) in accordance with the **draft** London Plan energy hierarchy, as follows:
  1. Be lean: use less energy and manage demand during operation.
  2. Be clean: exploit local energy resources and supply energy efficiently and cleanly.
  3. Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.

4. Be seen: monitor, verify and report on energy performance.
- B. Major development proposals will be required to demonstrate how the zero-carbon target will be met by applying the energy hierarchy, in line with **draft** London Plan policy SI2 (Minimising greenhouse gas emissions). Details of the approach used to meet the target should be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.
  - C. Major development proposals will be required to achieve a minimum on-site reduction of at least 35 per cent (beyond the baseline of Part L) of the current Building Regulations.<sup>30</sup> They should also calculate and minimise emissions from any other part of the development that are not covered by Building Regulations (i.e. unregulated emissions).
  - D. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, development proposals will be required to make contributions to address the identified shortfall through:
    - a. A cash-in-lieu contribution to Lewisham's carbon offset fund; or
    - b. Appropriate off-site measures where these can be demonstrated to be deliverable.

### **Explanation**

- 11.9. The **draft London Plan** sets a strategic objective for London to become a zero-carbon city by 2050. In order for the Borough to contribute to meeting these objectives in becoming zero-carbon itself, it will be necessary for new development to maximise energy efficiency and reduce carbon emissions. A zero-carbon target for major residential developments has been in place for London (and Lewisham) since October 2016 and will apply to major non-residential developments from 2019. To meet the zero-carbon target an on-site reduction of at least 35 per cent beyond the baseline of part L of the Building Regulations 2013 is required. Should the Building Regulations change over the plan period, then the policy threshold will be subject to review through the London Plan review process.
- 11.10. We will seek to ensure that all development proposals are designed giving priority to on-site carbon reductions. Consideration may be given to off-site contributions where it can be clearly and suitably demonstrated that carbon targets cannot be fully achieved on-site. These contributions will be required to address any shortfall and will be secured by planning obligations. Further details on carbon offset payments are set out in the council's Planning Obligations SPD. Carbon costing will be established in accordance with the London Plan and its associated guidance.

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<sup>30</sup> Building Regulations 2013. If these are updated during the plan period, the policy threshold will be reviewed in accordance with the London Plan review process.

## SD 4 Energy infrastructure

- A. Development proposals should be designed in response to a site-specific assessment of the most effective and efficient energy supply options, taking into account energy masterplans where appropriate. For large-scale schemes, applicants are encouraged to engage at an early stage with the relevant energy suppliers and bodies to establish future energy and infrastructure requirements necessary to support the development.
- B. Proposals for new-build development, and wherever possible proposals for conversions or alterations to existing buildings, should prioritise connection to decentralised heat networks. Major development proposals will be expected to provide a feasibility assessment for connecting to, and if possible extending, existing or planned future heat networks on or in proximity to their site. Minor new-build development proposals should optimise opportunities to connect to existing heat networks.
- C. All major and minor development proposals should be designed for future connection to a heat network, having regard to Heat Network Priority Areas of the London Heat Map and other local area opportunities, including those identified in energy masterplans.
- D. Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system. The heat source must be selected in accordance with the **draft** London Plan heating hierarchy, as follows:
  - 1. Connect to local existing or planned heat networks.
  - 2. Use zero-emission or local secondary heat sources.
  - 3. Use low-emission combined heat and power (CHP) where there is a case for CHP to deliver an area-wide heat network.
  - 4. Use ultra-low NO<sub>x</sub> gas boilers.
- E. CHP and ultra-low NO<sub>x</sub> gas boiler communal or district heating systems will only be acceptable where it is demonstrated that these sources are necessary, with proposals having fully investigated other options in the heating hierarchy, and there will be no adverse impact on air quality. Proposals will be considered having regard to **Policy SD6 (Improving air quality)** and relevant London Plan policies. Air Quality Assessments will be required to include full dispersion modelling to assess impacts on nearby receptors.
- F. Where CHP and ultra-low NO<sub>x</sub> gas boiler systems are acceptable in line with (E) above, proposals should be designed in a way that enables, and does not preclude, the decarbonisation of the site wide communal network in the future.
- G. Major housing development proposals will be required to, and all minor housing proposals should, submit an estimated heat unit supply price (£/kWh), annual standing charges and projected annual maintenance costs for their proposed Energy Strategy. This should include information detailing any assumptions the calculations are based on.

- H. Where site-wide communal and district heating systems are operational, heat and energy service providers will be encouraged to enter into customer charters with domestic and small business customers.

### **Explanation**

- 11.11. In order to achieve the strategic objective for Lewisham to become a zero-carbon Borough it will be necessary to change the way in which energy is used and supplied locally. This means shifting from a reliance on natural gas as the main energy source to a wider range of low and zero-carbon and renewable sources. Decentralised energy covers a range of technologies that do not rely directly on the electricity transmission network or gas grid. It is expected to play an increasingly important role in London's energy supply. Decentralised energy is vital to energy security and helping the Capital become more energy self-sufficient. It also offers opportunities in respect of carbon reduction as a sustainable energy source. In responding to the climate emergency we are committed to promoting decentralised energy locally and will seek to exploit opportunities for network investment, particularly as new development comes forward.
- 11.12. Development proposals should prioritise connection to decentralised heat networks wherever technically feasible. The London Plan identifies Heat Network Priority Areas where there are opportunities to facilitate decentralised energy network development. These areas feature heat densities that are sufficient for heat networks to provide an economically competitive option for supplying energy. They include parts of Lewisham and areas in adjoining Boroughs. Applicants are encouraged to refer the London Heat Map for the latest information on heat demands, supplies and networks across London along with the extent of Heat Network Priority Areas. The Heat Map is accessible online and updated regularly.
- 11.13. The council has prepared a suite of studies investigating the potential for decentralised energy network development in the Borough. This includes the Lewisham Heat Network Feasibility Study (2016), New Cross Heat Network Route Feasibility Assessment (2015) and Lewisham Town Centre Low Carbon and Decentralised Energy Report (2010). Building on this evidence we will prepare a Decentralised Energy Masterplan to provide an updated position on the most feasible options for network development. All proposals will be expected to refer to the latest local evidence for guidance in considering energy sources, and to ensure that opportunities for decentralised energy are maximised.
- 11.14. All proposals for major residential and commercial development will be expected to submit a feasibility assessment to fully evaluation connecting to an existing or planned future heat network where it is located on or in proximity to the site. The feasibility assessment should evaluate technical and financial viability and consider a range of factors included but not restricted to: capability of the network to supply part of the heat demand, location of development and distance to network pipes, physical barriers and other developments in the areas that may also be required to connect. For the purpose of this policy, a planned future network is one that is considered by the council likely to be operational within 3

years of the grant of planning permission. All minor new-build development proposals should also seek to secure connection to heat networks. Proposals will be expected to include an Energy Statement as part of the Sustainable Design Statement. This should provide sufficient information to demonstrate that feasibility has been fully investigated, having regard to the latest London Plan supplementary planning guidance.

- 11.15. In areas where there are no existing or planned district heat networks proposals should be designed for future connection to a heat network. This will help to ensure that connection is made more financially viable and technically feasible in future years. Proposals should have regard to the spatial strategy for the Borough as this provides an indication of the areas that are expected to accommodate significant growth and where network development is likely to be delivered over the long-term.
- 11.16. Consistent with the **draft** London Plan, all major development proposals within Heat Network Priority Areas and elsewhere should have a communal heating system served from a single energy centre, with the heat source for the system selected in accordance with the heating hierarchy. Proposals will be expected to demonstrate that the feasibility and viability of implementing options at the higher end of the hierarchy have been fully investigated before considering the use of CHP or gas boiler systems. We will seek to resist proposals that rely on CHP or gas boiler systems where their use is not sufficiently justified. Where the use of an ultra-low NO<sub>x</sub> is justified, this should achieve an emissions rating of <40 mg/kWh. Furthermore, all such proposals must not result in any adverse impact on air quality, in line with **Policy SD 6 (Improving Air Quality)** and relevant London Plan policies.
- 11.17. Where development proposals including CHP and ultra-low NO<sub>x</sub> gas boiler systems are acceptable in principle, they should be designed in a way that enables, and does not preclude, the decarbonisation of the site wide communal network in the future. Proposals should include information on the opportunities and potential measures in this respect. This could include, for example, details describing how the development could accommodate the plant space required for such decentralised energy networks, and how the individual dwellings have been designed to allow for and accommodate future connections.
- 11.18. Heat networks and communal heating systems must be designed, constructed, commissioned and operated in accordance with CIBSE CP1.2: Heat Networks Code of Practice. All developments that are required to connect to an existing or planned heat network in accordance with policy must explicitly demonstrate in their Energy Strategy how the scheme will comply with the above Code of Practice.
- 11.19. Where households and businesses are reliant on decentralised heat networks it is important that there are clear expectations for service standards. We will encourage the use of customer charters or publically available right of challenge in a fair and independent way. Such charters and ombudsman are useful in establishing clarity on matters such as system maintenance and end-user pricing, and can be particularly helpful to more vulnerable uses (for example, those in or at

risk of fuel poverty or start-up and micro-businesses). All developments that are required to connect to an existing or planned heat network in accordance with this policy should ensure that the future network operator will be registered with the Heat Trust Scheme (Heat Customer Protection Ltd.) The scheme sets out common customer service standards and protection requirements that are comparative to regulated utilities, drawing on legislation and good practice guidance.

## SD 5 Managing heat risk

- A. Development proposals should minimise internal heat gain and the impacts on the urban heat island through the design, layout and orientation of buildings and spaces, as well through the use of materials and urban greening measures, having particular regard to [Policy GR4 \(Urban greening and trees\)](#).
- B. All new development should be designed to reduce the potential for overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy, as follows:
  - 1. Minimise internal heat generation through energy efficient design.
  - 2. Reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation, and the provision of green roofs and walls.
  - 3. Manage the heat within the building through exposed internal thermal mass and high ceilings;
  - 4. Provide passive ventilation.
  - 5. Provide mechanical ventilation.
  - 6. Provide active cooling systems.
- C. Development proposals will only be supported where there is sufficient evidence to demonstrate that priority has been given to the implementation of feasible measures at the higher level of the cooling hierarchy through the design-led process.
- D. Major development proposals will be required to submit an Energy Statement to demonstrate how they will meet the requirements of (B) and (C) above
- E. Major development proposals incorporating amenity space and public realm should be designed to create a comfortable pedestrian environment, including through provision of shade and other passive cooling measures.

### Explanation

- 11.20. In recent years London has experienced higher than historic average temperatures along with more severe hot weather events. Heat risk is becoming an increasingly important issue, particularly in the context of a growing population and global climate change. All new development should therefore be designed to manage heat risk.
- 11.21. The urban heat island is experienced in areas where there is extensive urban development. Buildings and spaces in these areas absorb and retain heat during

the day and night. In a heavily urbanised place like London, this process results in the city being several degrees warmer than its surrounding areas. The urban heat island poses a significant health risk to vulnerable groups, such as older people or those with certain health conditions, particularly during peak summer months. All new development will therefore be expected to minimise internal heat gain and manage heat risk through the design, layout and orientation of buildings and spaces, along with the use of materials. Proposals should incorporate measures in line with the Mayor's cooling hierarchy, recognising that Lewisham should play a role in positively supporting regional planning objectives. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime.

- 11.22. Applicants should refer the latest Chartered Institution of Building Services Engineers (CIBSE) guidance on assessing and mitigating overheating risk in new developments, including TM59 for domestic development and TM52 for non-domestic development. The London Mayor's Energy Planning Guidance should also be referred. Proposals should undertake dynamic thermal modelling to ensure that development does not overheat, and this should address temperatures likely to be experienced over the lifetime of the development, having regard to CIBSE guidance and datasets included in document TM49.
- 11.23. Severe hot weather events can discourage pedestrian activity. Development will therefore be expected to be designed to promote a comfortable pedestrian environment, by helping to ensure that opportunities for respite, such as shaded areas, are integrated into the public realm and that other indoor amenity spaces are cool and well-ventilated. Where necessary, a contribution to cooling measures for spaces and streets outside the development boundary may be appropriate, for example, to make the public realm more comfortable and attractive for pedestrian travel. This is consistent with the Healthy Streets approach advocated by the Local Plan, in line with the [draft London Plan](#).
- 11.24. All major development proposals will be expected to submit an Energy Statement. This should clearly set out how measures at the higher end of the cooling hierarchy have been considered and given priority through the design-led process. We will seek to resist proposals that use measures at the lower levels of the hierarchy unless there is evidence to demonstrate that this is necessary, for example, for reasons of technical feasibility.
- 11.25. Whilst all development proposals will be expected to give consideration to managing heat risk, it is recognised that the feasibility of measures will be commensurate with the nature and scale of development. Minor developments, and in particular householder extensions, may have limited scope to implement some measures at the higher end of the hierarchy. However all minor development proposals are encouraged to investigate potential measures and incorporate these wherever possible. The urban heat island effect can be mitigated through the cumulative positive impacts of smaller developments. For this reason, the loss of established soft landscape features without replacement will be resisted for all proposals and new soft landscaping will be encouraged wherever possible.

## SD 6 Improving air quality

- A. Air quality is a significant public health issue in Lewisham. All new development should contribute to improving air quality within the Borough and reducing the population's exposure to poor air quality, in line with **draft London Plan Policy SI1 (Improving air quality)** and by supporting the achievement of objectives in Lewisham's latest Air Quality Management Plan.
- B. New major development must be at least air quality neutral and all development proposals must demonstrate that they will not:
  - a. Lead to further deterioration of existing poor air quality;
  - b. Create any new areas that exceed air quality limits, or compromise the achievement of compliance with targets in areas that currently in exceedance of the legal limits; and
  - c. Create an unacceptable risk of high levels of exposure to poor air quality; and
- C. Development proposals should be designed to prevent or minimise exposure to existing air pollution and implement measures to help improve air quality. Particular consideration should be given to the siting, layout and design of proposals located in Air Quality Management Areas and Air Quality Focus Areas, as well as for developments that are likely to be used regularly by large numbers of people (including public open space) and vulnerable groups, such as children and older people.
- D. Air Quality Assessments will be required to be submitted with proposals for:
  - a. Major development;
  - b. Minor development within an Air Quality Management Area and/or Air Quality Focus Area if the development is likely to adversely impact on air quality or introduce new sensitive receptors to exposure to an area of existing poor air quality; and
  - c. Community infrastructure (including health, education and leisure facilities), or other uses that are likely to be used regularly by vulnerable groups.
- E. Development proposals must demonstrate how they will comply with the Non-Road Mobile Machinery Low Emission Zone requirements and reduce emissions from the demolition and construction of buildings following the Mayor's 'The Control of Dust and Emissions for Construction and Demolition' SPG (2014), or subsequent guidance.
- F. Development proposals will be considered having regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (B) and (C) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided on-site. In exceptional circumstances, where it is demonstrated that this is impracticable or inappropriate, off-site provision may be acceptable where equivalent air quality benefits will be delivered in the local area.

## Explanation

- 11.26. Air quality is a significant public health issue in Lewisham and across London. The link between air quality and public health outcomes is well documented. Air pollution is estimated to reduce life expectancy of every person in the UK by an average of 7 to 8 months and in Lewisham, the proportion of all-cause adult mortality attributable to air pollution is 6.5 per cent, which is higher than the national average.<sup>31</sup> This policy supports the London Mayor's commitment to making air quality in London the best of any major world city. It also helps give effect to the NPPF which sets out that local plans should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs).
- 11.27. Alongside London Plan, including **draft policy SI1 (Improving air quality)**, the implementation of this and other Local Plan policies on sustainable transport, green infrastructure, energy, sustainable design and waste management will together contribute towards the objective of improving air quality across the Borough.
- 11.28. There are currently 6 AQMAs in Lewisham. These cover all the areas north of the A205 (South Circular) together with major roads in the south. The AQMAs have been declared for several pollutants. Monitoring indicates that the Borough is exceeding the EU annual average limit for Nitrogen Dioxide at some locations. Furthermore, whilst the Borough is meeting the EU Limits for Particulate Matter (PM10) it is exceeding the World Health Organisation air quality guideline annual average for this pollutant. In addition to AQMAs there are also 10 Air Quality Focus Areas (AQFAs) in the Borough; these areas are locations that have been identified as having high levels of pollution and human exposure. The current AQMAs and the Mayor's 'London Datastore' maintains an up-to-date list of AQFAs across the Capital, taking account of changing circumstances and latest available evidence. AQMAs are identified in **Figure X** and may be subject to periodic review and updating.
- 11.29. New major development will be required to be at least 'air quality neutral' and no development shall lead to a further deterioration of existing poor air quality. Development proposals should also reduce the population's exposure to poor air quality, particularly for those groups who are most vulnerable to its impacts such as children and young people and older people. New development, as a minimum, must not cause new exceedances of legal air quality standards or compromise achievement of compliance in those areas currently in exceedance, as currently provided by the Air Quality Standards Regulations 2010.
- 11.30. Applicants should refer to refer relevant London Plan supplementary planning guidance for further information on the Air Quality Neutral and Air Quality Positive standards. The council's latest Air Quality Action Plan and associated monitoring

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<sup>31</sup> Lewisham Joint Strategic Needs Assessment, A Picture of Lewisham. 2019.

reports should also be referred, along with our Good Practice Guide: Control of Pollution and Noise from Demolition and Construction Sites.

- 11.31. Proposals will be considered taking into account the individual and cumulative impacts of development in an area, consistent with national policy. We will have particular regard to proposals for major development and those located within AQMAs and AQFAs, recognising the existing localised levels of poor air quality and potential impacts of larger schemes. Applicants should take particular care where development is likely to be used regularly by vulnerable groups. This includes proposals for community facilities and specialist housing. Exposure to poor air quality can be avoided through the site selection process and/or through site layout and design solutions. New developments will be expected to contribute to actively reducing air pollution in Air Quality Focus Areas, supporting measures to improve air quality.
- 11.32. Air Quality Assessments (AQAs) will be required for certain types of qualifying development. Assessments must address impacts arising during the construction, occupation and operational phases of development. They should also consider the wider cumulative impacts on air quality arising from development within the locality.
- 11.33. Where an AQA indicates a potential negative impact on air quality, appropriate measures that will minimise or offset impacts from the development should be identified and implemented on-site. Planning permission will be refused unless appropriate mitigation measures are adopted to reduce the impact to acceptable levels. In practice, it may not always be possible to achieve Air Quality Neutral standards or to acceptably minimise impacts using on-site measures alone. If on-site measures are insufficient to make the development acceptable, the AQA should demonstrate that it is possible to include measures in the local area with equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement, where appropriate.
- 11.34. An AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that the impact on nearby receptors is minimal.
- 11.35. Development that involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to the Institute of Air Quality Management Dust Guidance and the London Mayor's SPG on 'The Control of dust and Emissions during Construction and Demolition'. Mitigation measures should be included in the Construction Management Plan. All medium and high risk sites should include real time construction dust monitoring, in line with the London Plan guidance.

#### MAP – AIR QUALITY MANAGEMENT AREAS / AIR QUALITY FOCUS AREAS

### SD 7 Reducing flood risk

- A. The council will seek to reduce flood risk and ensure resilience against the impact of flooding by:

- a. Using a sequential approach to the location of new development to avoid, where possible, flood risk to the population and property whilst taking account of the long-term impact of climate change;
  - b. Directing new development to those areas of the Borough that are at the lowest risk of flooding, having regard to Lewisham's Strategic Flood Risk Assessment (SFRA), by applying the Sequential and Exception Tests in accordance with national planning policy;
  - c. Requiring that all new development does not increase flood risk in the Borough, reduces the risk of flooding from all sources and is designed to remain safe and operational under flood conditions;
  - d. Working in partnership with stakeholders to implement the flood risk management actions in the Thames Estuary 2100 Plan; and
  - e. Seeking that new development maximises opportunities for river restoration, in line with Lewisham's River Corridors Improvement Plan SPD
- B. A site specific Flood Risk Assessment will be required for all development proposals within Flood Zone 2, 3a and 3b, all major development in Flood Zone 1, and elsewhere in the Borough where development may be at risk of other sources of flooding. The assessment must provide sufficient evidence for the council to assess whether the requirements of the Sequential and Exception Tests have been satisfied, and will be expected to:
- a. Be proportionate with the degree of flood risk posed both to and by the development;
  - b. Take account of all potential sources of flooding both on and off-site;
  - c. Make an appropriate allowance for the hazard posed by climate change over the lifetime of the development, informed by the latest Government guidance; and
  - d. Have regard to the recommendations of the latest Lewisham SFRA and the Lewisham Local Flood Risk Management Strategy.
- C. Where proposals satisfy the Sequential and Exception Tests the site layout and design of development should ensure that:
- a. The most vulnerable land uses are directed to areas of the site that are at lowest risk of flooding;
  - b. There is no net loss of flood storage capacity and adequate provision is made for flood storage and compensation, with priority given to on-site provision;
  - c. There is no detrimental impact on the natural function of the floodplain and floodwater flow routes across the site;
  - d. Appropriate mitigation measures are incorporated to address any residual flood risk, including safe access and egress for all likely users of the development; and
  - e. Flood risk is not increased elsewhere.
- D. Development proposals will be required to provide a site-specific Flood Emergency Response Plan to manage actual and/or residual flood risk, where appropriate.

### **Explanation**

- 11.36. The water environment is a defining feature of Lewisham. The Borough fronts onto the River Thames and the river poses a potential risk of flooding, although the adjacent land area benefits from the River Thames Tidal Defences. Lewisham also falls within most of the catchment of the River Ravensbourne and its tributaries, including the Quaggy, the Pool and Kyd Brook, which outfalls into the River Thames at Deptford Creek. The Honor Oak Stream (Chudleigh Ditch), another tributary of the Ravensbourne, also passes through the Borough. Elsewhere there are localised areas that are at potential risk from other sources of flooding including through surface water run-off, ground water flooding, surcharge from the sewer network and the blockage of culverts and gullies.
- 11.37. It is important that development does not increase flood risk to people, properties and infrastructure and that all proposals proactively seek to minimise and mitigate risk wherever possible. This is particularly important in locations that are known to be at risk of flooding. Applicants will be expected to consider risk from all sources of flooding using appropriate and up-to-date information. Early engagement with relevant stakeholders, including the council as Lead Local Flood Authority, the Environment Agency (EA) and Thames Water Utilities is strongly advised.
- 11.38. The council regularly reviews its Strategic Flood Risk Assessment (SFRA), the latest of which was published in 2019 and includes a Level 1 and Level 2 SFRA. The SFRA maps the Borough into flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures. The flood zone maps have been prepared using the latest available data from the Environment Agency however applicants should consult the EA to establish whether the flood zones have since been updated. Lewisham's Surface Water Management Plan (SWMP) provides additional information on other sources of flood risk. All proposals will be assessed against the latest available information.
- 11.39. In line with the NPPF and its associated guidance we will apply a sequential approach to the location of new development. This is in order to ensure that development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. We will consider the appropriateness of proposed uses within the different flood zones having regard to the Sequential and Exception Tests, and informed by Flood Risk Assessments submitted by applicants. Assessments are required to take into account the long-term hazard posed to development by climate change. The latest standing advice on climate change allowances published by the EA should be referred to and form the basis of assessments. Furthermore, the Lewisham Level 2 SFRA (2019) sets out evidence of the flood characteristics in the Borough (including flood depth, velocity, rates of inundation and duration of flooding) that should also be considered.
- 11.40. As part of the preparation of the Local Plan the council has undertaken a Sequential Test to assist in identifying those areas of the Borough that are suitable for strategic sites. Allocated sites that have passed the Sequential Test will not need to apply this test again, unless the proposed use is not consistent with the site allocation.

- 11.41. Where the Sequential and Exception Tests are satisfied we will seek that proposals fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through site layout and development design. This includes appropriate measures to ensure development is safe. Proposals should fully assess and address residual risk, including through flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and resilient design (e.g. to ensure the building's structural integrity is maintained and that drying and cleaning can be facilitated).
- 11.42. Proposals will need to be accompanied by a Flood Emergency Response Plan to ensure safe access and egress from actual and/or residual flooding, where appropriate. This measure is necessary to ensure that building occupiers can be made aware of the responses to various types and scale of flood threat, evacuation logistics, evacuation routes and other safety arrangements in terms of dry access, egress and refuge. Examples of such developments can include proposals with water compatible uses, alterations to existing buildings and building floor levels that have been raised, but where there is remaining flood risk under the 0.1% AEP event.
- 11.43. The Thames Estuary 2100 Plan sets out recommendations and actions that are needed to manage flood risk in the Thames Estuary, taking account of the long-term impacts of climate change. It promotes a multi-agency approach to implementation of priority strategic and local actions with partners including Government bodies, local authorities and developers. The TE 2100 Plan sets Lewisham Borough within 'Action Zone 2 – Central London'. The Local Plan both supports and helps to set a framework for positively managing development consistent with the TE2100 Plan.

#### MAP – FLOOD ZONES

### SD 8 Sustainable drainage

- A. Development proposals should aim to achieve greenfield runoff rates and ensure that surface water runoff is managed as close to its source as possible. Sustainable Drainage Systems (SuDS) should be incorporated into new development wherever possible, with priority given to green and blue over grey features, in line with the London Plan drainage hierarchy, as follows:
1. Rainwater use as a resource.
  2. Rainwater infiltration to ground at or close to source.
  3. Rainwater attenuation in green infrastructure features for gradual release.
  4. Rainwater discharge direct to a watercourse, unless not appropriate.
  5. Controlled rainwater discharge to a surface water sewer or drain.
  6. Controlled rainwater discharge to a combined sewer.
- B. All SuDS will be required to meet the Department for Environment, Food and Rural Affairs' Non-Statutory Technical Standards. They should also be designed to reflect guidance and principles set out in the London Plan Sustainable Design and Construction SPD and the SuDS Manual. In addition, all SuDS should:

- a. Be located and designed having regard to the London Sustainable Drainage Action Plan along with the council's Surface Water Management Plan and Local Flood Risk Management Strategy;
  - b. Be sensitively integrated into the development;
  - c. Maximise opportunities to enhance biodiversity and local amenity;
  - d. Improve the quality of water discharges, with provision for clean and safe water at the surface; and
  - e. Function effectively over the lifetime of the development.
- C. All proposals for major development and development within a Critical Drainage Area must achieve a greenfield runoff rate and volume leaving the site, as demonstrated through a Drainage Strategy. All other development will be expected to achieve at least a 50% reduction in existing runoff rates. Where a greenfield runoff rate cannot be achieved, or SuDS cannot be implemented due to reasons of technical feasibility or financial viability, proposals must demonstrate that:
- a. Surface water runoff (both in terms of volume and flow) has been reduced as much as reasonably practical; and
  - b. Measures to improve water quality have been investigated and implemented, wherever feasible.
- D. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate.

### **Explanation**

- 11.44. Surface water flooding occurs when high intensity rainfall generates runoff which flows and ponds in low-lying areas. It is generally associated with intense rain, saturated soils and an insufficient drainage capacity of the surface water system. Surface water flooding is becoming an increasing issue in London due to continued urban development (increased impermeable area) and climate change (greater rainfall intensity). Lewisham's Surface Water Management Plan (SWMP) identifies 9 Critical Drainage Areas (CDAs) which are particularly susceptible to surface water flooding. The CDAs fall within much of the London Plan Opportunity Area corridor and are also widely present in southern part of the Borough.
- 11.45. New development will be expected to contribute to minimising and mitigating flood risk through the use of Sustainable Drainage Systems (SuDS) and measures. SuDS comprise a sequence of management practices and techniques to slow the rate of surface water runoff and improve infiltration by mimicking natural drainage. This reduces the risk of flash-flooding which occurs when rainwater rapidly flows into the public sewerage and drainage systems. Drainage measures are particularly important in CDAs however we will seek to ensure that new development proactively responds to surface water management throughout the Borough.
- 11.46. Development proposals should seek to reduce flows to a greenfield runoff rate. This is the rate that reflects the natural rate of water runoff from an undeveloped,

naturally permeable site. The volume of runoff must be stored on site and be calculated based on the nationally agreed return period value of a 1 in 100 year critical storm event, including an allowance for climate change. For major development and proposals within CDAs, it is particularly important that schemes optimise the use of Sustainable Drainage Systems to achieve these outcomes. The Government has published Non-Statutory Technical Standards for Sustainable Drainage Systems which proposals will be expected to comply with.

- 11.47. SuDs should be viewed as more than just a tool to manage surface water flooding. Where they are well designed and sensitively integrated into development, SuDS can enhance the amenity value of a site and area by improving the quality and attractiveness of the public realm and open spaces. Furthermore, they offer opportunities to support and enhance biodiversity through the creation of habitats such as ponds and wetlands, along with improving the quality of water discharges. All proposals should apply the principles of the latest SuDS Manual published by the Construction Industry Research and Information Association (CIRIA), which is nationally recognised good practice guidance, or other local guidance where appropriate.
- 11.48. SuDS should be designed giving priority to 'green' or 'blue' over 'grey' measures, although it is recognised that technical feasibility issues may constrain opportunities. This policy provides flexibility to implement a variety of SuDS measures, as the techniques used will depend on individual site characteristics and the nature of development proposed. Applicants will be expected to demonstrate that SuDS will function effectively over the lifetime of the development. A Drainage Strategy must accompany all major development proposals and other proposals within a Critical Drainage Area. This should include a SuDS Management Plan setting out long-term management and maintenance arrangements.
- 11.49. If it is suitably demonstrated that the policy requirements cannot be satisfied, for example, by reasons of site condition (e.g. land contamination or other site constraints) or financial viability, we will require applicants to provide evidence that runoff rates have been minimised as far as reasonably practical.

#### MAP – CRITICAL DRAINAGE AREAS

### SD 9 Water management

Watercourses and flood defences

- A. Development proposals on sites containing or adjacent to a main river or ordinary watercourse will be required to:
- Demonstrate how the objectives of the Thames River Basin Management Plan, London River Restoration Action Plan, Marine Plan for the South East and other relevant local guidance, including the River Corridors Improvement Plan SPD, have been taken into account;
  - Ensure that there is no adverse impact on the natural functioning of the watercourse, including by maintaining an undeveloped buffer zone with an

adequate set back distance from the watercourse, as agreed with the council and the Environment Agency;

- c. Investigate and maximise opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible;
- d. Where appropriate, provide a condition survey of existing flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure the functional integrity of this infrastructure over the lifetime of the development; and
- e. Incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces, including by enhancing public access to these spaces.

#### Water quality

- B. All development proposals should seek to improve water quality and must ensure that there is no deterioration in the quality of a watercourse or groundwater, in line with the European Water Framework Directive 2000.
- C. Where development is proposed within a Source Protection Zone it must not result in an unacceptable risk to groundwater quality.

#### Wastewater and water supply

- D. Development proposals will be supported where it is demonstrated that the local water supply and public sewerage networks have adequate capacity both on and off-site to serve demand arising from the development; or where such capacity does not exist and there are no programmed works, arrangements are made to ensure adequate provision prior to the occupation of development. A Water Supply and/or Drainage Strategy may be required to demonstrate that suitable arrangements are in place to service the development.
- E. Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. The council will give preference to mains foul drainage and seek to restrict the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones. Where non-mains drainage is proposed for foul water, proposals should implement the most sustainable drainage options as supported by a Drainage Strategy.
- F. All proposals for new development should maximise opportunities to alleviate water scarcity and be designed to minimise pressure on the combined sewer network by incorporating SuDS in line with [Policy SD 8 \(Sustainable Drainage\)](#), and by meeting the **draft** London Plan requirements for water efficiency, as follows:
  - a. All proposals for new residential development should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption);
  - b. Major non-residential development should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.

## Strategic role of waterways

- G. Waterways provide multifunctional social, economic and environmental benefits that support sustainable communities. Development proposals should identify and positively respond to the unique attributes of waterways, giving particular consideration to their:
- Environmental function and ecological qualities;
  - Contribution to the Borough's network of open spaces;
  - Recreational and amenity value;
  - Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character;
  - Support for the visitor economy; and
  - Potential to facilitate water transport.
- H. The Lewisham section of the Thames Policy Area is designated in the Local Plan, as reflected in the Policies Map. All new development within the Thames Policy Area will be expected to positively respond to the distinctive character and qualities of the River Thames and its surrounds, in line with [Policy LNA 4 \(Thames Policy Area and Deptford Creekside\)](#).
- I. Convoys Wharf is included within London's network of safeguarded wharves. The council will continue to safeguard Convoys Wharf taking into account extant planning consents and any future safeguarding Direction. Development proposals involving water transport at Convoys Wharf will be considered having regard to [draft London Plan policy SI15](#) (Water transport), along with other relevant policies.
- J. Proposals for water and marine based residential, commercial, community and transport uses (including moorings and jetties) alongside or within a waterway will only be supported where they:
- Are demonstrably a water-dependent use;
  - Are appropriately located and designed, taking into account the nature and scale of the proposed use;
  - Positively respond to, and do not adversely impact on, the open character, historic setting and views of the waterway, its frontage (including foreshore) and the surrounding area;
  - Do not have a detrimental impact on river navigation and flood defence infrastructure;
  - Do not have a detrimental impact on the environment, including water quality in line with (B) above;
  - Do not impede or compromise existing public access points to the waterway, and extend or enhance access wherever possible; and
  - Ensure adequate access and servicing arrangements for all intended users of the development.

### Explanation

Watercourses and flood defences

- 11.50. Watercourses within Lewisham form part of the network of rivers and streams within the London basin and are one of the defining features of the Borough. They contribute to local character and visual amenity, offer health benefits through recreational opportunities and provide the setting for Borough's historical past. Watercourses also have an important environmental role in supporting biodiversity and are critical to climate change adaptation through their flood management function. We will seek to ensure that watercourses are positively managed recognising the many important contributions they make to sustainable and resilient communities.
- 11.51. All proposals will be expected to demonstrate how they have taken into account the Thames River Basin Management Plan and the London River Restoration Action Plan, particularly in contributing to the European Water Framework Directive (WFD) 2000 objectives. Furthermore, applicants should refer Lewisham's River Corridors Improvement Plan SPD. The SPD sets out local guidance to secure high quality development along the Borough's river corridors whilst balancing objectives for environmental protection and flood risk management.
- 11.52. Lewisham's river corridors are heavily constrained by urban development along much of their respective lengths. The River Thames has been heavily modified over time with the growth of London, including the construction of raised defences along much of its width. Considerable modifications have also been made to other river channels in the Borough over the past decades including through canalising and culverting. The compromising of natural river processes can adversely impact on biodiversity and water quality. The council has recently worked with the Environment Agency and other partners to deliver investment in river corridor improvements as part of its ongoing regeneration programme. This includes works along the Rivers Ravensbourne and Quaggy to provide improved defences and dedicated landscaped areas for flood storage, local amenity and improved biodiversity. These schemes have demonstrated that it is possible to put rivers back at the heart of new development and we aim to continue building on these successes.
- 11.53. In order to ensure there is no adverse impact of the natural functioning of a watercourse, or the integrity of a flood defence, all new development must maintain an undeveloped buffer zone with an adequate set back distance from the watercourse. A relief of 8 metres from a main river and 5 metres from an ordinary watercourse should be secured, unless otherwise agreed by the council and the Environment Agency. Buffer zones should be left free of permanent structures, ensure adequate access for the maintenance of flood defences and be sensitively integrated into development in order to enhance their amenity value. Development within 20 metres of a bank of a main river will need Environment Agency consent. Some rivers have defined flood defence assets and proposals will be required to identify assets and these into consideration, where appropriate.
- 11.54. On sites with existing flood defence infrastructure we will seek to ensure that the functional integrity of this infrastructure is secured over the lifetime of the development. We may require proposals to include a Condition Survey of all existing infrastructure and if necessary, make provision for any necessary repairs

or maintenance, to be secured through a legal agreement or planning conditions. Culverts are considered flood defences and sites with existing culverts will be expected to investigate the feasibility of deculverting, with robust justification provided where this is not considered possible.

#### Water quality

- 11.55. The European Water Framework Directive 2000 (WFD) provides the legal framework for the protection, improvement and sustainable use of waterbodies including rivers and groundwater. The improvement of waterbodies to 'good' ecological status or potential, and not allowing the deterioration in the status of waterbodies, are key requirements of the WFD. Applicants are encouraged to refer the Thames River Basin Management Plan for details of the quality of waterbodies in the Borough and throughout the basin district, along with measures needed to meet the WFD objectives for water quality. Proposals will be expected to investigate and maximise opportunities to integrate these measures.
- 11.56. There are groundwater abstraction points in Lewisham that are used for the public water supply. It is important that groundwater at these points is protected from new sources of pollution, and its quality improved wherever possible. The Environment Agency has identified and mapped Source Protection Zones (SPZs) and aquifers within the Borough. We will seek to ensure that all proposals appropriately consider and manage risk to groundwater contamination in these areas and elsewhere across the Borough. Proposals that present an unacceptable risk to groundwater quality will be resisted.

#### Wastewater and water supply

- 11.57. It is vital that development sites and localities are supported by efficient and well-functioning sewerage and wastewater infrastructure, particularly as this plays an important role in the management of flood risk and water quality. Lewisham has a mix of separate and combined sewer systems. Sewer flooding can arise in the foul system when surface water enters via misconnection, or where the capacity of combined systems is exceeded. In both cases this results in surcharge of contaminated surface water. Applicants are encouraged to consult with Thames Water who record sewer flooding incidents by postcode area, and this information gives an indication of sewer flood risk at sites across the Borough.
- 11.58. All proposals will be expected to demonstrate that there is adequate water supply, surface water, foul drainage and sewerage capacity both on and off-site to service demand arising from the development. Applicants are therefore encouraged to engage with Thames Water, or other water and sewerage undertakers as appropriate, early in the planning and design stage. Where there is a capacity issue and there are no planned capacity works or upgrades, the applicant should agree with the infrastructure provider a programme of necessary improvements. These should be implemented prior to the occupation stage. In some circumstances we may require submission of a Water Supply and/or Drainage Strategy, such as where major development is proposed in an area where there are concerns about existing infrastructure provision. This supporting information

should include a detailed model of the network capacity to determine whether mitigation is required.

- 11.59. For surface water, development should ensure that storm flows are attenuated or regulated into the receiving public network through on or off-site storage. Where it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where it is proposed to discharge to a public sewer prior approval from Thames Water Utilities will be required.
- 11.60. The Thames Tideway Tunnel is a major project being undertaken by Thames Water and Thames Tideway Limited. The project will assist in upgrading to London's sewerage system to cope with long-term future demands. A new 25-kilometre interception, storage and transfer tunnel is being constructed, running up to 65 metres below ground and below the River Thames. The sewer will run across London and capture flows from sewer overflow points along the River Thames. There are two temporary major works sites within Lewisham, one at Earl Pumping Station and one at Deptford Church Street. We will continue to work with stakeholders to secure the delivery of this strategic infrastructure.
- 11.61. The built environment plays a significant role in the way water is consumed, distributed and disposed of. London experiences lower rainfall than the national average while having a very large population. It has been declared an area of serious water stress and this trend is likely to be exacerbated by climate change. The council supports London Plan objectives for delivering a sustainable and secure water supply, and addressing water scarcity, particularly in the context of a growing population and increased demand for this valuable resource.
- 11.62. All development should be designed to maximise water efficiency. New residential development will be required to meet the **draft** London Plan target for mains water consumption, which reflects the Optional Requirement set out in Part G of the Building Regulations. Major non-residential development will be expected to meet BREEAM excellent standard for the 'Wat 01' water category, to achieve at least a 12.5% improvement over defined baseline performance standard. In addition, major developments and high or intense water use developments (such as hotels) should include a grey water and rain water harvesting system, and applications will be required to submit robust justification where such a system is not considered feasible.

#### Strategic role of waterways

- 11.63. The term 'waterways' refers to the network of linked waterways in London – also known as the Blue Ribbon Network – which includes the River Thames, its tributaries, canals and other water spaces. Waterways are of strategic importance, particularly in Lewisham given its Thames-side location, and provide multifunctional benefits to the environment and local communities. The Lewisham Characterisation Study (2019) is helpful in explaining the significant role waterways have played in the Borough's historical and cultural development, and the way in which they contribute to local character today. Waterways also form part of the local network of open space, offering recreational opportunities and

amenity value for residents and visitors. Further, as set out elsewhere in this section, the water environment is crucial to supporting biodiversity and flood risk management. All development proposals will be expected to positively respond to the unique attributes of Lewisham's waterways. Applicants should provide planning statements that detail how the different functional values of water spaces have been taken into account. This is particularly important for proposals within the Thames Policy Area, for which further detailed policies are set out in [Policy LNA 4 \(Thames Policy Area and Deptford Creekside\)](#), and reflect the key objectives for the Thames Policy Area: Bermondsey to Woolwich set out in sub-regional strategies.

- 11.64. There is a network of wharves along the River Thames that are protected for use as a wharf by a safeguarding Direction issued by the Secretary of State for Housing, Communities and Local Government. The existing network dates from 2005 and includes one wharf in Lewisham, Convoys Wharf. The London Mayor undertook a review of the network in 2018<sup>32</sup> and this included some recommended changes. The council submitted representations through the formal consultation process, and highlighted its position that the review did not reflect the extant outline planning permission at Convoys Wharf, granted by the Greater London Authority in 2015. In particular, the planning permission has effectively reduced the size of the wharf and sets conditions with respect to its future use. The London Mayor is currently considering consultation responses and will submit recommendations for safeguarding to the Secretary of State, who will then make a determination on the matter. The council will continue to safeguard Convoys Wharf taking into account the extant planning consent and any future safeguarding Direction.
- 11.65. We strongly support the use of Convoys Wharf to facilitate delivery of the Lenox Project, consistent with the extant planning consent at this strategic development site. This involves the restoration of the Lenox, a state-of-the-art naval ship that was built in 1678 in Deptford and was the first of Charles II's thirty ships. The project has significant potential for heritage-led regeneration in the Borough, and will help to promote the visitor economy as well as understanding of Lewisham's historical and cultural development.
- 11.66. It is important that water infrastructure, including residential and commercial moorings, do not adversely impact on the Borough's waterways. Where new development is proposed on or within a waterway, including the foreshore, we will expect applicants to consult with the relevant authorities and bodies including Environment Agency, Port of London Authority and the Canal and River Trust. Early engagement will help to ensure that development is appropriate to its location and does not result in a detrimental impact on waterways, including on navigation, water quality, biodiversity, flood defences and local character. Proposals must demonstrate that there will be adequate access and servicing arrangements to support all intended users of the development, and that any new provision is sensitively located into the site and its surrounds. We will strongly

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<sup>32</sup> The Safeguarded Wharves Review 2018. Greater London Authority. 2018.

resist proposals that inhibit or detract from existing public access to waterways, or preclude future opportunities for enhanced access from being delivered.

## SD 10 Ground conditions

### Contaminated land

- A. Development proposals must demonstrate that any risks associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe.
- B. All proposals for development on land which is suspected of being contaminated or potentially contaminated, or if a sensitive use is proposed, will be required to submit a Preliminary Risk Assessment (Phase 1 Study) to identify the level and risk of contamination on the site and adjacent land, and where necessary:
  - a. Undertake a Site Intrusive Investigation (Phase 2 Study) to provide a detailed assessment of contamination and risks to all receptors;
  - b. Prepare a Risk Management and Remediation Strategy appropriate to the individual site circumstances; and
  - c. Submit a Verification Plan and Closure Report prior to the occupation of the development.

### Hazardous substances

- C. Development proposals involving the storage or use of hazardous substances, or development of a site in the vicinity of a hazardous installation, will only be permitted where it is demonstrated that appropriate safeguards are in place to ensure there is no unacceptable risk to human health, safety and the environment.

### **Explanation**

#### Contaminated land

11.67. Contaminated land is defined within the Environmental Protection Act 1990. It refers to land that has been polluted with harmful substances to the point where it could pose an unacceptable risk to human health and the environment.

Environmental health and planning legislation requires the council to ensure that land is assessed for contamination and made suitable for current and proposed future uses. Through the planning process we will seek that all development is appropriate to its location, whilst requiring landowners and developers to fulfil their responsibility for securing safe development where a site is affected by contamination.

11.68. In order to appropriately identify and manage the risks associated with land contamination we will require proposals to undertake a series of steps to ensure that development is safe. In the first instance a Preliminary Risk Assessment must be undertaken. This should consist of a desktop study and site walkover report that shows all previous and existing uses of the site and adjacent land. It should

assesses the potential contamination risks to identified receptors. Following this preliminary assessment applicants will be required to submit, where appropriate:

- A Site Intrusive Investigation which provides a more detailed assessment of site characteristics and risks to receptors;
- Where contamination is present, a Risk Management and Remediation Strategy to deal with the identified hazards to human health and the environment, along with site management and monitoring arrangements;
- A Verification Plan for any remediation works, completed by a suitably qualified professional, in order to ensure effective measures to protect: occupiers of the development and neighbouring land uses; the structural integrity of new and existing buildings; and any watercourses or aquifers; and
- A Verification/Closure Report, to be submitted prior to occupation, which demonstrates completion and validation of the works set out in the approved Risk Management and Remediation Strategy, including results of sampling and monitoring carried out in accordance with the Verification Plan.

11.69. The council's Environmental Protection (EP) service maintains a Contaminated Land Register and the EP website pages provide information that can direct applicants to further resources which may assist with site investigations and possible remedial measures. Planning conditions may be used to secure appropriate measures prior to the commencement and occupation of development.

11.70. When contaminated land has the potential to affect watercourses or groundwater, the Environment Agency should be contacted, as in certain circumstances it is the responsible authority under the Environmental Protection Act 1990.

#### Hazardous substances

11.71. Hazardous installations consist of sites and facilities for chemical processing, fuel and chemical storage and pipelines. It is important that any risks associated with hazardous substances (including to human health, safety and the environment) are appropriately managed and mitigated. There are listed hazardous installations both within and in proximity to the Borough, including the Lower Sydenham Gas Holders. Whilst hazardous substances are controlled by the separate need for hazardous substances consent along with health and safety regulations, the Local Plan also has a role in ensuring public safety from major accidents, consistent with the NPPF and its associated guidance.

11.72. All planning applications for hazardous installations, or the use of land in proximity to them, must suitably demonstrate that development will not constitute a risk to the population or the environment. In considering proposals and potential risks, we will apply the Health and Safety Executive (HSE) land use planning methodology and consult with the HSE, Environment Agency and other stakeholders as appropriate. Depending on individual site circumstances proposals may be required to submit a Preliminary Risk Assessment and/or a Risk Management Strategy that clearly identifies risks and sets out measures to appropriately manage and mitigate these.

## SD 11 Reducing and managing waste

- A. A circular economy approach will be promoted in Lewisham in order to make a more efficient use of resources, to achieve increases in the re-use and recycling of materials and reductions in waste going for disposal. Development proposals should apply circular economy principles in the design and construction process, in line with Policy **SD 12 (Design to support the circular economy)**.
- B. To help London achieve net waste self-sufficiency and ensure the Borough's strategic waste apportionment target is met, the council will work in partnership with the local authorities comprising the South East London Joint Waste Planning Group to identify and safeguard strategic sites suitable for waste management. The following existing sites will be safeguarded in Lewisham:
- South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross
  - Recycling Centre (HTL Waste Management Services), New Cross
  - Reuse & Recycling Centre (London Borough of Lewisham), New Cross
- C. Development proposals for new waste management facilities will only be permitted where:
- They are required within the Borough to meet an identified strategic need;
  - It is demonstrated that the waste management capacity at existing safeguarded waste sites has been maximised, and there are no opportunities for appropriately increasing capacity at these sites to meet the identified need;
  - They are located within a Strategic Industrial Location;
  - They achieve a positive carbon outcome or demonstrate that steps are in place to meet the minimum greenhouse gas performance target, in line with **draft London Plan policy SI8 (Waste capacity and net waste self-sufficiency)**; and
  - They will not result in any adverse impacts on human health, the natural environment and local amenity, having regard to relevant legislation and other development plan policies.

### Explanation

11.73. The **draft** London Plan advocates the 'circular economy' as a strategic approach to the sustainable use and management of materials and waste. The circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. The main principles of the circular economy, which are explained in detail in the **draft** London Plan, are reflected in the **Diagram X** below. These principles should be applied in the design and construction stages of all new development. The successful implementation of these principles will help to reduce the volume of waste that is produced and will need to be managed both in Borough and across London. Transition towards the circular economy in Lewisham is necessary to support wider regional and national strategies on sustainable waste

management. This is recognising that the continuation of the current linear economy approach (where resources are taken to make products, which are then disposed of at the end of their useful lifetime) would require significant investment in additional waste infrastructure along with land to support this.

11.74. The **draft** London Plan includes a strategic objective for London to be net waste self-sufficient by 2026. This means that all waste generated in the city should also be managed within it, rather than being exported elsewhere. To support this objective the London Plan apportions a per cent share of London’s total waste to be managed by each Borough, which is set out in tonnes. It then requires Boroughs to allocate sufficient land or sites, and identify facilities, to manage the apportioned tonnages of waste. The council will continue with the approach to pool and manage the waste apportionment within its sub-region, working in partnership with other local authorities in the South East London Joint Waste Planning Group. This includes Lewisham along with Bexley, Bromley, Royal Borough of Greenwich, Southwark and City of London. The South East London Joint Waste Technical Paper provides further details on the pooled apportionment and strategic sites with capacity to manage this over the long-term. There are 3 waste management sites safeguarded in the Local Plan, which are located within the Strategic Industrial Location at Surrey Canal Road.

11.75. The South East London Joint Waste Technical Paper provides that there is currently sufficient waste management capacity in the constituent Boroughs to meet the London Plan pooled apportionment. Proposals for new waste management facilities (including extensions to existing facilities) will therefore only be supported where they are required to meet an identified strategic need within the Borough, taking into account the pooled capacity within the sub-region. We will expect all applications to provide evidence of a local need and to demonstrate that capacity at existing sites has been fully maximised before pursuing other development alternatives. Consideration should be given to the enhancement of existing facilities through the site selection process. We will require that all proposals for new or enhanced waste management facilities are located within Strategic Industrial Locations, which are the Borough’s designated locations for general industrial and storage uses. Other employment areas are not appropriate for this type of use. This is because the successful delivery of spatial strategy relies on the intensification of Mixed-use Employment Locations and Locally Significant Industrial Sites, giving priority to Class B1 (light industrial) uses to meet future employment needs. All proposals for waste management facilities will be required to demonstrate that there will be no adverse impacts on human health, the natural environment and local amenity. Proposals will be assessed against relevant London Plan policies, including **draft Policy SI8 (Waste capacity and net waste self-sufficiency)**.

Figure X. Safeguarded waste sites

Facility	Address	Site size	Licensed capacity (tonnes)	Average annual throughput (tonnes)

South East London Combined Heat & Power (SELCHP) energy recovery facility	Landmann Way, New Cross, SE14 5RS	2.30 ha	464,000	426,880
Deptford Recycling Centre	Landmann Way, New Cross, London SE14 5RS	0.63 ha	130,000	52,000
Landmann Way Reuse & Recycling Centre	Landmann Way, New Cross, Lewisham, SE14 5RS	0.24 ha	TBC	5,660

### MAP – SAFEGUARDED WASTE SITES

### IMAGE: CIRCULAR ECONOMY PRINCIPLES (as per draft London Plan).

## SD 12 Design to support the circular economy

- A. All development proposals will be expected to apply circular economy principles in order to minimise waste and support the delivery of sustainable development in Lewisham. Consideration should be given to the circular economy hierarchy for building approaches, as set out in the **draft** London Plan, at the start of the design process taking into account the following principles:
- a. Building in layers, ensuring that different parts of buildings and spaces are accessible and can be maintained and replaced when necessary;
  - b. Designing out waste, ensuring that waste reduction is planned in from project inception to completion (including consideration of standardised components, modular build and re-use of secondary products and materials);
  - c. Designing for adaptability;
  - d. Designing for disassembly; and
  - e. Using materials that can be re-used and recycled.
- B. Major development proposals should aim to be net zero-waste. They will be required to submit a Circular Economy Statement, as part of the Sustainable Design Statement, in line with the requirements of **draft** London Plan policy **S17 (Reducing waste and supporting the circular economy)**.
- C. Development proposals will be expected to sustainably manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases.
- D. Development proposals must be designed to ensure adequate on-site provision for the sorting of recyclable material, composting of organic material and the disposal of general waste during the occupation stage. Proposals will be expected to make provision for:
- a. Dedicated internal and external storage facilities, with flatted residential development including temporary storage space for each unit and communal storage for waste materials pending collection;

- b. Safe and convenient access to storage facilities, both for building occupiers and collection services;
  - c. Well sited and designed development that avoids and mitigates adverse impact on the amenity of building occupiers and neighbouring site users and uses; and
  - d. Separate provision for commercial and household waste where mixed-used development is proposed.
- E. All proposals for new multi-storey flatted residential development, including mixed-use development, must also make provision for sensitively designed storage and collection systems at each floor. Proposals should fully investigate design options for basement servicing before giving consideration to the use of forecourts or ground floor internal storage.
- F. Where public realm is included as part of a development proposal provision for recycling and waste management facilities appropriate to this element will be required. Provision should be sensitively located and designed. This includes accessible and clearly legible facilities to enable the public to easily distinguish between options for sorting of recyclable material, disposal of general waste and where appropriate, composting of organic material.

### **Explanation**

- 11.76. The circular economy supports a holistic and sustainable approach to the use and management of materials. Lewisham can make a significant contribution to helping London achieve net waste self-sufficiency if new buildings and spaces within the Borough are designed in a way that avoids and reduces waste arisings and supports high recycling rates. By seeking that new developments apply circular economy principles in the design and construction process, we aim to prioritise the re-use and recycling of materials over their disposal.
- 11.77. Applicants should refer London's circular economy route map<sup>33</sup> for further guidance on the application of circular economy principles. Large-scale developments present significant opportunities to support the transition to more sustainable and innovative building design and construction, particularly where they are to be delivered through the comprehensive redevelopment of sites. In line with the **draft** London Plan, major development proposals will be required to submit a Circular Economy Statement demonstrating how the circular economy hierarchy has been taken into account. This should be included as part of the Sustainable Design statement. The London Mayor has committed to providing further guidance on Circular Economy Statements, covering the construction phase of development.
- 11.78. Development proposals should seek to maximise opportunities for adaptable design of buildings and spaces. Residential developments are unlikely to come forward for a change of use over the long-term given housing needs in the Borough. However this should not discourage applicants from considering building

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<sup>33</sup> London's circular economy route map, GLA & London Waste and Recycling Board. 2017

options that can extend the life of developments, for example, by using durable materials and designing spaces that can be modified to the needs of different users. Non-residential developments, such as retail and commercial uses, are likely to have shorter lifespans and are therefore well positioned to support more comprehensive approaches to adaptive design. This is in part owing to the changing requirements of building occupiers and business turnover, particularly in the context of London's competitive and evolving economy.

11.79. All development proposals will be expected to consider options for sustainably managing the materials used and arising from the development. Consideration at the early stages in the design process will help to ensure the most appropriate and practical solutions are employed during the construction and occupation stages. It is important that recycling, composting and waste management facilities are well designed and sensitively integrated into new development. This will help to ensure protection of amenity and avoidance of nuisance, both for site occupiers as well as those in surrounding properties. New multi-storey flatted development poses unique challenges given the number of households that require provision, the limited space available for sorting, collection and servicing, and the unique nature of managing waste through vertically stacked buildings. However, this should not preclude occupiers benefitting from suitable and convenient access to facilities, and that waste collection services are not compromised by poorly designed and laid out buildings.

11.80. Public realm must also be adequately serviced with readily accessible and clearly legible recycling and waste management facilities. Public spaces should include adequate provision of facilities that encourage easy separation of recyclable and waste materials at the point of disposal. Not only will this assist with reducing waste but it can help to protect local amenity through the avoidance of unsightly litter.

# 12 Transport and connectivity

## TR1 Sustainable transport and movement

- A. The integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, healthy, liveable and sustainable neighbourhoods in Lewisham. Development proposals will be expected to make the most effective use of land, and optimise the capacity of sites, by taking into account connectivity and accessibility to existing and planned future public transport, along with the priority given to improving opportunities for active travel, including walking and cycling routes and other elements of the public realm.
- B. Development proposals must not adversely impact on the effective functioning and safe use of Lewisham's transport network and public realm.
- C. The land, buildings, space and supporting infrastructure required for the construction and operation of Lewisham's network of strategic and other transport infrastructure will be safeguarded, including for the schemes identified in [Table 12.1](#). New development proposals will be required to provide adequate protection for, and positively respond to the need to facilitate the delivery of, the Borough's network of transport infrastructure.
- D. To encourage a shift to more sustainable transport modes, as well as to tackle local deprivation by ensuring equality of access to opportunities, the council will work positively and in partnership with stakeholders to secure improvements to other elements of the public transport network including:
  - a. Improvements at Lewisham's stations, including enhancements to accessibility and interchange between modes, such as step-free access;
  - b. Bus priority and bus stop infrastructure; and
  - c. The use of the River Thames for passenger-based transport.
- E. Development proposals must contribute to sustaining and creating healthy and liveable neighbourhoods by applying the design-led process and maximising opportunities to improve the pedestrian and cycle environment. This will require that careful consideration is given to the movement and connective function of the public realm, along with its place qualities, having particular regard to Policies [QD3 \(Public realm and connecting places\)](#) and [TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).

### Assessing and mitigating transport impacts

- F. Transport Assessments, Transport Statements and/or Travel Plans must be submitted with applications for Major development and other development proposals that are likely to impact on the capacity and functioning of the transport network (including the walking and cycling network). These should be commensurate with the nature and scale of development proposed, and provide sufficient information to address impacts at the local, network-wide and strategic level where relevant.

- G. Development proposals that do not comply with (B) and (C) above, or otherwise prohibit or prevent the necessary and safe functioning of Lewisham’s strategic transport infrastructure and network, will be refused unless it can be demonstrated that adverse impacts will be avoided or appropriately mitigated. Proposals will be expected to deliver direct mitigation measures, with suitable alternative provision that is agreed by the relevant transport authorities and service providers, and/or planning contributions, where appropriate.
- H. Development proposals will be assessed having regard to the cumulative impact of development, including within Lewisham and neighbouring local authority areas.
- I. Where there are identified capacity issues with respect to the additional travel demand expected to be generated by new development proposals, planning permission will be contingent on the provision of the necessary public transport and active transport infrastructure to cater for this demand, in line with **draft London Plan Policy T4.D (Assessing and mitigating transport impacts)**. Consideration will be given to both existing and planned transport infrastructure, taking into account timeframes and funding committed for any future schemes.

**Table 12.1 – Indicative list of strategic transport schemes**

<b>Scheme</b>	<b>Timeframe</b>
<b>Public transport</b>	
Bakerloo line upgrade and extension	Medium
Lewisham Station and interchange	Short to medium
Brockley Station and interchange	Medium
Surrey Canal Road Station	Short to medium
New Cross to Lewisham Overground extension	TBC
'Metroisation' of London Overground services	Short to medium
<b>Healthy streets and active travel</b>	
A2 New Cross Road / Amersham Gyratory removal	Short
A21 Healthy Streets Corridor ('Lewisham Spine')	Short to medium
A205 (South Circular) Re-routing (Catford)	Short
Ringway Corridor (Southend Land and Whitefoot Lane)	Medium
Healthy Neighbourhoods	Short to medium

## MAP – Public Transport Accessibility Levels

### Explanation

- 12.1. An effective, resilient and safe transport network is necessary to ensure equality of access to opportunities for Lewisham residents and to facilitate growth in an efficient and sustainable way. The integration of land use and transport is an important consideration both at the strategic Borough-wide and individual site level. The Local Plan aims to support delivery of the London Mayor’s Transport Strategy by rebalancing the transport system away from car use and towards more sustainable transport modes. This policy sets out our approach to facilitate this ‘modal shift’ so that Lewisham contributes to the achievement of **the draft London Plan** target for 80 per cent of all journeys in London to be made by walking, cycling or public transport by 2041. The policy also forms part of our response to the Climate Emergency as a means to significantly reduce

greenhouse gas emissions locally, along with tackling the associated issues of air quality and noise.

- 12.2. There is an uneven distribution of transport provision in the Borough particularly in terms of public transport. Neighbourhoods around New Cross, Deptford, Lewisham and Catford are generally well served by rail and bus transport. A high concentration of stations link to frequent services on the Docklands Light Railway (DLR), National Rail and London Overground networks. However, other parts the Borough do not benefit from the same level of provision and connectivity. Furthermore, bus and rail orbital routes are somewhat limited, making radial movements typically faster than orbital trips. The main orbital road links, such as the South Circular Road, contribute to orbital trips being more attractive by car. This situation, combined with the uneven distribution of public transport infrastructure, has contributed to a greater reliance on car use in some areas.
- 12.3. Investment in transport infrastructure is necessary to support the levels of planned growth within the Borough over the plan period, as well as to substantially increase the proportion of journeys being made by walking, cycling and public transport. An indicative list of strategic transport schemes is set out in [Table 12.1](#). These schemes have been signposted as they are critical to the delivery of the spatial strategy for the Borough. However a wider complement of investments and interventions are also needed to address the distinct accessibility issues in local areas. This list should therefore be read together with Lewisham's Infrastructure Delivery Plan and [Table 10.1](#) in the [draft London Plan](#). The Bakerloo line extension to Hayes and interchange upgrades at Lewisham and Brockley stations are noteworthy as they are vital to ensuring the development capacity of sites is optimised, and to addressing the increase in passenger demand arising from London's growth.
- 12.4. We will work proactively with key stakeholders (including the Greater London Authority / Transport for London and Network Rail) along with landowners and development industry partners to deliver new and improved transport infrastructure. This includes safeguarding the land, sites, buildings, space and associated infrastructure required to facilitate the construction and safe operation of Lewisham's transport network. Development proposals will be required to provide adequate protection for, and positively respond to the need to facilitate, strategic and other transport schemes.
- 12.5. High quality public realm underpins the integrated approach to land use and transport. By improving the public realm and making places and streets well-connected, greener, safer and more accessible, we aim to encourage and better enable movement by sustainable modes. Development proposals will be expected to consider public realm at the early stage of the design-led process, having regard to [Policies QD3 \(Public realm and connecting places\)](#) and [TR3 \(Healthy streets as part of healthy neighbourhoods\)](#). High quality public realm will be integral to increasing the number of trips made by walking, cycling and public transport, which in turn has the potential to lead to improved health outcomes, including through uptake in physical activity and improved air quality.

Assessing and mitigating transport impacts

- 12.6. It is important that opportunities are taken to avoid and/or mitigate any potential adverse impacts on the transport network. In order to ensure that impacts are appropriately considered and addressed through the planning process, development proposals will be required to include a Transport Assessment, Transport Statement and/or Travel Plan, where appropriate. The information should be sufficiently detailed and accurate to allow for the clear identification of specific impacts and to inform any necessary mitigation measures.
- 12.7. Transport Assessments should be undertaken in line with relevant good practice guidance, including that published by the Greater London Authority / Transport for London. Transport modelling may be required to demonstrate that a proposal will not result in any adverse impacts, either individually or cumulatively in combination with other development. Healthy Streets Assessments must be included as part of the Transport Assessment for major development proposals, in line with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).
- 12.8. Travel Plans must reflect the Local Plan priority given to supporting and enabling sustainable transport modes, including active travel along with use of public transport. They should address the accessibility requirements of all likely users of the development, taking into account the needs of disabled people and others with specialist mobility requirements.

## **TR2 Bakerloo line upgrade and extension**

- A. The Bakerloo line upgrade and extension is fundamental to supporting strategic growth and regeneration objectives in Lewisham and the wider London region. The council will work in partnership with stakeholders to secure the timely delivery of the Bakerloo line upgrade and extension, in accordance with the **draft** London Plan. It will also seek to maximise the opportunities associated with the Bakerloo line extension by directing investment in a way that significantly improves accessibility across the Borough, tackles deprivation and optimises the development potential of local areas and sites in a sustainable way.
- B. Development proposals will be required to facilitate the delivery of the Bakerloo line upgrade and extension, having regard to policies [TR1.C and TR1.D \(Sustainable transport and movement\)](#).
- C. Development proposals on sites located within 400 metres of a proposed Bakerloo line station will be closely scrutinised to ensure that development does not preclude the delivery of the Bakerloo line extension, and further optimises the future accessibility provided by its introduction into the local area. This may include provision for new or improved public realm and infrastructure enhancements.
- D. Development proposals should optimise the use of land and capacity of sites taking into account the Bakerloo line upgrade and extension and future improvements to Public Transport Accessibility Levels enabled by its delivery. The council will seek to ensure that development on sites in proximity to existing, planned or potential future Bakerloo line stations is appropriately phased in order to secure the most beneficial

use of land, particularly to help meet Lewisham's housing needs, including by implementing [Policy TR1.H \(Sustainable transport and movement\)](#).

## MAP – Proposed Bakerloo line route and potential stations

### Explanation

12.9. Despite its inner-London location Lewisham does not currently benefit from direct access to the London Underground network. However, the [draft London Plan](#) sets out the proposal to upgrade and extend the Bakerloo line from Elephant and Castle to Lewisham and beyond. We strongly support this proposal and will continue to advocate and plan positively for the extension of the Bakerloo line through Lewisham to Hayes. This strategic transport scheme will improve connectivity, increase the capacity and resilience of the transport network in London, as well as support modal shift in the Borough. Some of the key benefits of the extension include:

- The opportunity to upgrade the existing line to allowing for levels of service similar to that of the Jubilee or Victoria Lines. The current Bakerloo line rolling stock and signalling dates from the early 1970s, and is the oldest on the Underground network. As a result, the service is slow and the line is one of the most underutilised in Central London
- Additional capacity by relieving existing demand on parallel lines (Southern/South-eastern/Jubilee) and modes (buses);
- Increased connections and alternative routes will also reduce the need to interchange from London Overground (East London Line) to Central London at New Cross Gate and Canada Water, alleviating crowding on the London Overground and Jubilee Line;

12.10. The Bakerloo line upgrade and extension is also critical to the achievement of our growth and regeneration objectives. The extension will assist in addressing the existing inequality in access to public transport, particularly in the Borough's southern area where we have designated a Strategic Area for Regeneration. The extension will also play a vital role in stimulating investment in helping to unlock the development potential of strategic sites, including those sites around stations and within areas along its route. In addition, the scheme could potentially enable a future London Plan Opportunity Area designation in the Bell Green and Lower Sydenham area.

12.11. Given the expected transformative effects of the Bakerloo line upgrade and extension it is important that new development helps to facilitate and does not preclude its delivery. This includes the safeguarding of land and buildings required for the construction and operation of the extension, including for its route, stations, portals, ventilation shafts and other operational functions. Proposals within 400 metres (approximately 5 minutes walking distance) of a proposed Bakerloo line station will be heavily scrutinised to ensure that development does not prejudice the scheme's delivery, and positively responds to its introduction in the locality. This includes transport and public realm measures to enhance legibility and access to the station and the surrounding area by all sustainable modes of travel.

12.12. Development proposals should optimise the use of land and capacity of sites taking into account the Bakerloo line upgrade and extension and future improvements to Public Transport Accessibility Levels enabled by its delivery. A pragmatic and carefully managed approach to site development will be required. This is in order to ensure that new development contributes to the delivery of sustainable communities, with density levels that are appropriate to the site context, including public transport accessibility and local area character. For major development proposals we will seek that development is appropriately phased. Planning permission may be contingent on the provision of the necessary infrastructure to cater for additional demand arising from the scheme, line with the [Policy TR1.H \(Sustainable transport and movement\)](#) and [draft London Plan Policy T4.D \(Assessing and mitigating transport impacts\)](#).

### TR3 Healthy streets as part of healthy neighbourhoods

- A. The Healthy Streets Approach will be promoted in Lewisham in order to support the delivery of sustainable, healthy and liveable neighbourhoods locally. Priority will be given to measures that encourage and help to facilitate the safe and convenient movement of pedestrians and cyclists along with travel by public transport, including investment in high quality public realm.
- B. Development proposals will be required to demonstrate how they have considered and applied the [draft London Plan](#) Healthy Streets Approach and Indicators. All major development proposals will be required to submit a Healthy Streets Assessment as part of the Transport Assessment. Proposals will be supported where they have positively engaged with the Healthy Streets Approach through the design-led process to deliver appropriate public realm and other improvements that support walking, cycling and the use of public transport.
- C. The Healthy Streets Approach will be given particular priority along key movement corridors that link Lewisham's neighbourhoods and town centres with each other and those outside of the Borough. This includes corridors located in areas with lower levels of public transport accessibility and/or areas experiencing deprivation. Development proposals must have regard to relevant guidance that supports corridor improvements, including the council's future [A21 Corridor Supplementary Planning Document](#).
- D. Development proposals should safeguard and contribute to enhancing the Borough's network of walking and cycling routes, including the strategic routes of the Thames Path, South-East London Green Chain and the Waterlink Way, along with Cycle Superhighways and Quietways. Opportunities to enhance connections between existing and proposed future routes should be investigated and implemented wherever appropriate and feasible. Proposals that adversely impact on the safety, quality and convenience of the Borough's network of walking and cycling routes, and associated infrastructure (including dedicated cycle parking provision), will be strongly resisted unless appropriate mitigation measures are provided.

- E. High quality public realm is integral to the delivery of the Healthy Streets Approach. In line with [Policy QD 3 \(Public realm and connecting places\)](#) development proposals must be designed to maximise the contribution that public realm makes to encourage active modes of travel. This includes measures to enhance site access, permeability and connectivity by maintaining or integrating safe and legible routes for pedestrians and cyclists along with removing barriers to movement.
- F. To support the Healthy Streets Approach, development proposals should provide end-of-trip facilities for cyclists that are accessible and designed to a high quality standard. These facilities should be provided at a level that is commensurate with the nature and scale of development and the required level of cycle parking, commensurate with the parking standards of [Policy TR4 \(Parking\)](#).
- G. To help facilitate more liveable and sustainable neighbourhoods in Lewisham, the council will work with stakeholders and local communities to investigate the feasibility of, and implement where appropriate, traffic management and other measures to improve the quality and amenity of residential areas. This may include interventions to reduce, re-route or calm vehicular traffic (particularly around schools and other community facilities) and/or lower speed limits in localities, as well as to enhance the quality and safety of the pedestrian and cycle environment.
- H. Development proposals should be designed to ensure that the public realm is not adversely impacted by installations, including advertising columns, and seek opportunities to remove redundant installations wherever possible, in line with [Policy QD3 \(Public realm and connecting places\)](#).

#### MAP – Strategic walking and cycling routes

##### Explanation

- 12.13. The Healthy Streets Approach is set out in the [draft London Plan](#) and underpins its objectives for achieving 'Good Growth'. It will be strongly supported in Lewisham in order to achieve a significant step-change away from car use to more sustainable transport modes such as walking, cycling and public transport. The Healthy Streets Approach is reflected in Lewisham's Transport Strategy, which includes a number of objectives that will guide implementation of the Healthy Streets Approach locally and which are given effect through the Local Plan.
- 12.14. Everyone should benefit from safe and convenient access to public transport, local services, community facilities, education, training and employment opportunities. Through the Healthy Neighbourhood Approach and its associated 'Indicators' we will work with stakeholders and development industry partners to deliver a wide range of public realm improvements. Together these should contribute to making Lewisham's neighbourhoods and streets safer, greener and less polluted, more legible and accessible to all. A key guiding principle is to ensure that priority is given to pedestrians and cyclists, making active travel a more attractive option for people to move throughout the Borough.

- 12.15. Lewisham's population will continue to increase in the context of London's growth. Maintaining the current levels and high proportion of journeys made by car is not efficient or sustainable. Many of London's streets are already heavily congested and the road network has limited capacity to absorb further increases in the number of vehicles. In response to this situation, we will seek to deliver a more efficient and effective use of land and road space by promoting travel by walking, cycling and public transport.
- 12.16. In the local context, Lewisham's southern areas currently have the highest levels of dependency on car use for personal travel. This is due to the comparatively low levels of public transport accessibility along with limited opportunities for active travel on high quality cycle and pedestrian routes. The Local Plan places a particular focus on key strategic corridors that can better link the Borough's neighbourhoods with each other. This includes the A21 Corridor which has the potential to significantly improve north to south connections in the Borough, and encourage multi-modal journeys by linking pedestrians and cyclists with bus and rail services. Similarly, the Ringway Corridor (Southend Lane and Whitefoot Lane) can help to improve orbital movements east to west. In addition to the strategic corridors it is imperative that there is good connectivity within and between town centres, along with improved access to community facilities and public transport nodes. Development should support the delivery of a fully integrated active travel and public transport network in Lewisham, with good linkages to neighbouring Boroughs and wider London.
- 12.17. High quality and effectively managed public realm is integral to the successful delivery of the Healthy Streets Approach. All development proposals will therefore be considered in line with the detailed requirements of QD3 (Public realm and connecting places). Proposals should seek to identify and positively address issues of severance and poor connectivity, amenity and pollution (including air quality) to support the creation of attractive, vibrant and accessible urban environments. By transforming the quality of our streets we also aim to encourage people to spend more time in public spaces, which in turn, can provide more opportunities for recreation and socialising, and help to support the vitality and viability of town centres and other places.
- 12.18. By referring the Indicators of the Healthy Streets Approach development proposals should demonstrate how buildings, including their main access points, positively interface with the street and help to improve local area amenity. Proposals should explore options to increase widths to footpaths, and building designs that provide vehicular access away from adjoining street junctions. Where such interventions cannot feasibly be delivered, planning contributions may be sought for public realm enhancements to help mitigate impacts.
- 12.19. Improving safety on Lewisham's roads is also a key objective of this policy. Interventions that prioritise the safe movement of pedestrians and cyclists, and which may consequently impact on vehicle movement (such as by reducing speeds), are necessary to realise modal shift. This approach will support the Mayor of London's 'Vision Zero' strategy of eliminating all deaths and serious injuries on the London transport network from all road collisions by 2041.

12.20. Addressing the current high levels of inactivity amongst Londoners is a key focus of the Healthy Streets Approach. According to data cited in the London Plan, currently only 34 per cent of adult Londoners report having walked or cycled for two ten-minute periods on the previous day. This lack of activity is a cause of many of public health issues, including Type 2 diabetes, colon cancer, coronary heart disease and depression. Implementation of this policy within the Borough will deliver people-oriented infrastructure (such as street furniture, landscaping, and cycle parking) to encourage active travel, improving the health of our local communities over the long-term.

## TR4 Parking

- A. A carefully managed approach to parking provision will be taken recognising the varying levels of access to public transport across Lewisham along with the strategic objectives to deliver inclusive, sustainable and healthy neighbourhoods, including by significantly reducing air pollution and greenhouse gas emissions.
- B. The design of parking provision and the amount of spaces provided in new development should respond to the need to ensure safe and convenient access for all users, and also reflect the priority given to encouraging active modes of travel and use of public transport. Development proposals will be assessed against the parking requirements and standards set out in [draft London Plan](#), including for:
  - a. Residential and non-residential disabled persons parking;
  - b. Cycle parking, with the higher minimum standards applying in Lewisham;
  - c. Car parking;
  - d. Residential parking;
  - e. Office parking;
  - f. Retail parking; and
  - g. Hotel and leisure uses parking (including consideration of coach parking).
- C. When assessing proposals against (B) above, consideration will be given to existing and future planned Public Transport Accessibility Levels, along with the existing provision of step-free access at stations.
- D. Where development proposals for housing require the provision of parking, the design and allocation of space for occupants should be considered in line with the following sequential approach:
  - 1. Disabled persons parking and access arrangements.
  - 2. Cycle parking and associated end-of-trip facilities.
  - 3. Car share or car club parking.
  - 4. Family dwelling car parking
  - 5. Other occupant parking
  - 6. Visitor parking.
- E. Major development proposals, development proposals located within town centres and developments likely to generate a significant number of visitors should investigate opportunities to integrate space for cycle hubs to accommodate provision of cycle hire schemes.

- F. Proposals for car-free development will only be supported where it can be suitably demonstrated that:
- a. The development is appropriately located at a well-connected and highly accessible location;
  - b. The development is located within an existing Controlled Parking Zone (CPZ), or it can be demonstrated that there is capacity on the existing local road network to accommodate the parking demand generated by the development;
  - c. There is sufficient capacity on the public transport network in the locality to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure; and
  - d. There will be no adverse impact on existing provision of on-street parking;
- G. The council will consider the need for Controlled Parking Zones to manage additional or new demand arising from development across the Borough, and will implement these where appropriate.
- H. In order to manage the parking demand associated with new development, the council will consider on a case-by-case basis, whether it is appropriate to require that the development Permit Free (except for Blue Badge holders).
- I. A minimum of 20 per cent of total car spaces provided on-site are to have active provision of electric charging points, with a minimum of a further 40 per cent designed with the cabling prepared for future use. In the case that a development has a Travel Plan in place, the levels of usage of electric vehicles should be monitored, with new charging points installed as demand increases.
- J. Car Parking and Management Plans will be required to be submitted with applications for Major development and other proposals that are likely to generate a significant demand for parking or impact on existing parking provision. This includes parking provision for large public and community facilities, including for sport, leisure and recreation uses.
- K. Development proposals for residential and commercial uses will be expected to investigate opportunities to implement electric vehicle charging points, having regard to the council's Low Emissions Vehicle Charging Strategy.

### **Explanation**

- 12.21. When considering the level of parking provision for new development, we will apply the **draft London Plan** parking standards, as set out in **Policy T5 (Cycling)** and **T6 (Car parking)**, taking into account the car parking standards for different types of land uses. Development proposals will be expected to refer the London Plan for further information on the requirements in this respect.
- 12.22. When assessing proposals against the parking standards, we will take into account the presence of step-free access at stations. Whilst some areas may benefit from high Public Transport Accessibility Levels, the lack of step-free access at stations can significantly constrain access for some users. We will therefore take a carefully managed approach to parking provision where stations are in proximity to, and likely to be servicing, new developments do not currently

benefit from step-free access and/or there are no immediate funding commitments to deliver this provision by the time of the development's occupation.

- 12.23. New development will be expected to encourage and help to facilitate cycling. This will require that careful consideration is given to the design of public realm, as discussed elsewhere in this section, along with the provision of high quality and dedicated facilities for cyclists, including easily accessible, safe and secure cycle parking. Applicants are minded to note that for cycle parking, Lewisham is identified in the [draft London Plan](#) Policy T5 (Cycling) as a borough where the higher cycle parking standards apply.
- 12.24. Whilst we are broadly supportive of car-free or car-capped development, it is important that this type of development is appropriately managed. This will ensure there is no adverse impact on the highway network and local amenity. Car-free or car-capped development will only be acceptable in principle where the development is located within a highly accessible location and within an area where there is an existing Controlled Parking Zone. Consideration will be given to proposals where it can be demonstrated that a new CPZ will be in place by the time of the occupation of development. In addition, there may be some circumstances where car-free development is not acceptable, for instance, to ensure the needs of Blue Badge holders are suitably accommodated.
- 12.25. Cycle hire schemes are becoming an increasingly attractive, convenient and cost-efficient option for people to make part or all of their journeys by cycling. There are a number of schemes within the Capital with different operational requirements, ranging from dedicated docking stations to 'remote collection and drop-off', which are aided by new technology. To encourage cycling we are broadly supportive of these schemes, however their use must be carefully managed to ensure that docking stations or cycles do not result in unsightly or hazardous street clutter, or otherwise adversely impact on the public realm, safety and local amenity. We will encourage proposals to investigate opportunities to make provision of dedicated space to accommodate cycle hubs, so that they can be sensitively integrated into the site and neighbourhood. This is particularly for major development proposals, proposals within town centres and/or those which are likely to attract a significant number of visitors (for example, cultural or education facilities).
- 12.26. Whilst it is recognised that some residents and commercial uses will continue to rely on vehicles, the use of electrically charged vehicles provide an alternative to conventional gas fuelled vehicles. Their use can help to reduce harmful greenhouse gas emissions and mitigate impacts on climate change. We will therefore encourage development proposals to make provision for charging points, wherever vehicle parking is necessary. The council has prepared a Low Emission Vehicle Charging Strategy, which applicants will be expected to refer. The strategy is targeted at increasing the range of charging options for electric vehicle, including both residential and commercial uses.

## TR5 Deliveries, servicing and construction

- A. Development proposals must facilitate safe, clean and efficient delivery and servicing for all of the site's intended occupiers and uses. Delivery and servicing requirements should be considered at the early stage of the design-led process, particularly in mixed-use schemes, in order to ensure practical site layouts and building designs that protect local amenity and avoid or mitigate adverse impacts to the highway network.
- B. Provision of adequate space and facilities for deliveries and servicing should be made off-street, with on street loading bays or other facilities only used where it is demonstrated this is necessary due to feasibility. Larger developments, including major residential schemes, should make provision for well-integrated facilities to allow for deliveries to be received outside of peak hours and for secure, temporary storage of parcels or goods.
- C. Development proposals for commercial and industrial uses should ensure that parking provision for servicing and delivery is commensurate with the specific operational needs of the development. The level and type of parking provision will be considered on a case-by-case basis, and applicants must provide evidence to demonstrate that the provision is appropriate to location, nature and scale of commercial or industrial use.
- D. Major developments and other development proposals that are likely to generate a significant number of vehicle movements from deliveries, servicing or construction will be required to submit a Delivery and Servicing Plan and/or Construction Logistics Plan as part of the Transport Assessment. This should provide a sufficient level of detail about the servicing, delivery and freight requirements of the development from the construction to occupation stages, and demonstrate that all likely adverse impacts on local amenity and the highway network have been avoided or mitigated, recognising that final details may be sought by condition. Consideration should be given to the timing of deliveries.
- E. For larger schemes, including where sites are to be delivered comprehensively through a masterplan, proposals will be required to prepare and implement a site-wide strategy for deliveries, servicing and construction. This should support the design-led process and help to enable coordination and integration of servicing requirements across the site(s).

### Explanation

- 12.27. Freight movement (including for deliveries, servicing and construction) is an important consideration in the planning and design process. At a strategic level, **the draft London Plan** seeks to facilitate sustainable freight movement by rail, river and road through the consolidation of activities, modal shift and improved coordination in the timing of deliveries. We broadly support these strategic objectives, which are given effect locally through the Local Plan.

- 12.28. Careful consideration will need to be given to development involving large-scale freight consolidation and distribution activities. All such proposals should be appropriately located, for example, in Strategic Industrial Locations, and clearly demonstrate how they will positively address sustainable freight movement in the Borough without adversely impacting on the road network, local amenity or the environment. Consolidation and distribution uses should also be commensurate with the role and function of the site or area within which they are located. This is particularly important for employment areas, where our priority is to safeguard land for Class B1 uses to meet identified local needs for workspace.
- 12.29. To support implementation of the strategic approach to freight, and as part of Lewisham's Transport Strategy, we will explore options and work with stakeholders to make provision for centralised delivery hubs, including secure lockers, in optimal locations throughout the Borough. This will support our objectives for traffic reduction with consequential benefits in terms of traffic congestion, air quality and noise pollution.
- 12.30. Largely driven by advances in technology, the logistics and freight industry is rapidly shifting to a model of 'last mile' delivery. It is also adapting to changes in consumer behaviour and the rising popularity of home deliveries, including for groceries, other retail items and takeaway meals. These changes have contributed to the prevalence of delivery vehicles on the road network. They have also introduced new challenges for the design of buildings and spaces.
- 12.31. Delivery and servicing requirements for new development needs to be considered at the early stage of the design-led process. Provision of adequate space and facilities should be made off-street and well-integrated into the site and locality. Larger developments, including residential and mixed-use schemes, have the capacity to generate a significant number of service and delivery trips, which will need to be addressed. Proposals should incorporate delivery receipt and storage facilities that suit the needs the intended occupiers and uses, include secure storage and where possible, containerised (cold storage). Opportunities should be taken to consolidate or coordinate provision in order reduce the number vehicle movements.
- 12.32. All major development proposals, and other proposals that are likely to result in a significant number of freight movements, including in the construction and operation stages will be required to submit a Delivery and Servicing Plans and/or Construction Logistics Plan. These should be prepared having regard to the latest Transport for London Guidance.

## TR6 Taxis and private hire vehicles

- A. Development proposals for offices, taxi ranks, and other operational space associated with taxis and private hire vehicle businesses (including minicabs) will be supported where:
- a. They are appropriately located, giving priority to sites within or in close proximity to town centres and near stations;

- b. The development will not result in a harmful overconcentration of similar uses in the locality;
  - c. It is suitably demonstrated that there will be no adverse impact on local area amenity and the highway network, including existing on-street parking provision;
  - d. Pedestrian and cycle routes will not be impeded, particularly where these are used for access to bus stops, station entrances and other public transport services;
  - e. The development, including any ancillary facilities, is designed to a high quality standard and well-integrated into local area;
  - f. Offices and ranks are accessible and safe during operational hours, including through the use of appropriate lighting and CCTV; and
  - g. Parking spaces delivered on-site to meet the operational use of a building (including offices, hotels, community facilities and major public facilities) have active charging points for all designated taxi spaces, in line with the **draft London Plan**.
- B. Development proposals will be assessed having regard to the cumulative impact of facilities for taxis and private hire vehicles in the locality and the **draft London Plan** strategic target to increase mode share for walking, cycling and public transport to 80% of all trips by 2041.

### **Explanation**

- 12.33. This policy sets out requirements for new development associated with taxi and private hire vehicle businesses, including minicabs. This type of development is distinguished from the land and facilities used for car clubs or car share services, which are dealt with separately in **Policy TR4 (Parking)**.
- 12.34. Our priority is to deliver inclusive and healthy neighbourhoods by encouraging and helping to facilitate active travel and the use of public transport. However, it is recognised that other modes of travel play a role in supporting local residents and visitors, including taxis and private hire vehicles. This travel mode makes up a small proportion of local journeys, around 1 per cent of all trips per day in Lewisham. Yet it is an important part of London's transport network and valuable for a wide range of users. This includes people with reduced mobility who require accessible door-to-door transport services, or who those who do not have access to reliable alternative means of travel, for example, due to the lack of public transport accessibility or infrequent services.
- 12.35. Taxis and minicabs also provide a safe and regulated transport option. They assist people to complete journeys beyond the reach of the bus or train network, or in many cases, provide the only safe and convenient transport option during the early morning, evening and night-time. In addition, the taxi and private hire vehicle industry plays a role in the local and wider regional economy, and is in itself a source of jobs. As of July 2019, there were over 20,000 licensed taxi drivers and 100,000 licensed private vehicle hire drivers registered in London.
- 12.36. A balanced approach is therefore necessary to ensure the appropriate management of land for transport functions, including that required for taxis and

private hire vehicles. Facilities should ideally be located in close proximity to town centres or train stations where there are compatible land-uses, opportunities for linked trips and where journeys are most likely to originate or end. Proposals will be expected to demonstrate that development will not result in an overconcentration of similar uses in the locality. The cumulative impact of development will therefore be a consideration in the assessment of proposals.

12.37. As with all other types of development, proposals associated with taxis and private hire vehicles must be designed to a high quality standard. Taxi offices, ranks and other facilities should be appropriately sited and provide all users of the development with good levels of safety and security, including through sensitively integrated lighting and the use of CCTV. It is also important that facilities are designed to be accessible to all. In line with other Local Plan policies, development proposals will be supported where they do not result in adverse impacts on traffic congestion, public safety, amenity and local character.

### TR7 Digital and communications infrastructure and connectivity

- A. The council will work with stakeholders to secure the provision of high quality, fast and reliable digital infrastructure across Lewisham to support accessible and inclusive communities, as well as to facilitate growth and diversification of the local economy.
- B. In line with **draft London Plan Policy S16** (Digital connectivity infrastructure) development proposals will be required to take appropriate measures to enable full-fibre, or equivalent infrastructure, connectivity to all end users within new development, along with meeting the expected demand for mobile connectivity generated by the development.
- C. Development proposals should demonstrate how they will improve digital connectivity on sites in areas that are poorly served by broadband coverage, including designated employment locations, having regard to Lewisham's Infrastructure Delivery Plan and other relevant information on broadband coverage.

#### Infrastructure and equipment design

- D. Development proposals for communications infrastructure and equipment will only be supported where it can be suitably demonstrated that:
  - a. The equipment is the minimum needed to meet operational requirements, having regard to future demand or planned improvements;
  - b. Opportunities for equipment sharing have been fully investigated and taken into account;
  - c. There is no significant adverse impact on the visual amenity of the occupiers of the host building, where relevant, and neighbouring occupiers;
  - d. If located on a main pedestrian road, a minimum residual footway is provided;

- e. Detrimental impact on the external appearance of the host building or structure, street scene or space on which the equipment is located will be avoided or mitigated; and
  - f. The equipment is sensitively located and appropriately designed, and does not detract from local area character, having particular regard to:
    - i. The need to preserve or enhance the significance of heritage assets, including Listed Buildings and conservation areas;
    - ii. The use of design treatments to ensure the least possible visual impact, including colour, landscape and other interventions to help screen or conceal cabling and other apparatus; and
    - iii. The cumulative impact of telecommunications installations on a structure, site or area.
- E. In order to minimise visual impact all communications equipment should be removed as soon as reasonably practicable once it is not required for use, and older equipment should be upgraded wherever feasible.

### **Explanation**

- 12.38. Communications infrastructure, including digital infrastructure, is playing an increasingly important role in the functioning of cities and society. It is transforming how infrastructure and services are provided, with innovative ‘Smart City’ technologies that make use of information to deliver more resource and cost efficient provision. It is also helping to facilitate different forms of communication between people as well as enabling more convenient and wider access to goods and services. In addition, digital infrastructure is important for business and now considered essential to sustainable economic development.
- 12.39. Digital infrastructure also has implications for physical connectivity and the transport network. For example, new technologies are changing the way in which people work and commute, often reducing the need to travel. Further, smart technologies are supporting efficiencies in the logistics sector, with improved timing and coordination in servicing and deliveries. Over time communication technologies may have significant impacts on the transport network, helping to reduce demand and/or the volume of movements, particularly during traditional peak hours.
- 12.40. Digital infrastructure is considered essential strategic infrastructure and necessary to support more inclusive and sustainable communities. Not all areas of Lewisham benefit from the same level of provision of digital and communications infrastructure. Premium full-fibre broadband is currently only available in 13 per cent of the Borough, and there is very limited availability in the area covering the Lewisham North Creative Enterprise Zone.<sup>34</sup> It is vitally important that full-fibre broadband coverage is enhanced. This is to ensure equality of access to services for Lewisham residents, and to support our economic development objectives,

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<sup>34</sup> London Connectivity, Greater London Authority. Data cited August 2019.  
<https://maps.london.gov.uk/connectivity/>

particularly to grow the cultural and creative industries. We will therefore work with industry stakeholders and development partners to ensure the provision of high quality, fast and reliable digital infrastructure across the Borough, including full-fibre or equivalent broadband.

#### Infrastructure and equipment design

- 12.41. We are committed to ensuring that local residents, organisations and business are well placed to benefit from modern digital and communications technology. However it is important that the development of associated infrastructure is appropriately managed. If not carefully sited and designed, infrastructure and equipment can adversely impact on amenity, local character, heritage assets and the functioning of the public realm.
- 12.42. Communications equipment, including satellite dishes, should be sited and designed so they will have the least detrimental visual impact. It is particularly important that equipment positively responds to local character, including conservation areas, listed buildings and other designated and non-designated heritage assets. In addition to siting, proposals should consider how to conceal equipment using design treatments including colour, landscaping or other means, such as GRP shrouding. Unless extremely well designed into a building or structure, or disguised from view, telecommunications should not be located on a principal street frontage.
- 12.43. All proposals will be expected to demonstrate that they have optimised opportunities to mitigate visual impact, including through engagement with relevant providers and service operators for sharing equipment, such as masts and cabinet boxes. This should include consideration of any planned future improvements necessary to meet the needs of current or future occupiers within a site or area.
- 12.44. The Manual for Streets should be referred for guidance on appropriate residual distances where development is located on a main pedestrian road. In town centres and other high traffic areas, the minimum residual distance of 1.8 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.
- 12.45. Communications equipment and supporting structures (masts, cabinet boxes, satellite and other dishes, antennae, cabling, shrouds and stands) should be removed as soon as reasonably practicable once not required. This will help to ensure that the quality of townscapes and streetscapes are not adversely impacted by unnecessary clutter.

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# Part Three

Lewisham's neighbourhoods and places

# 13 Introduction

## Celebrating Lewisham's diversity and valuing its distinctiveness

- 13.1. Lewisham is a diverse borough comprising many communities of people, neighbourhoods and places, all of which have distinctive identities that should be celebrated and valued. The Local Plan aims to respond to the unique qualities of our communities and neighbourhoods in delivering Good Growth. To achieve the Vision for Lewisham and secure the successful delivery of spatial strategy, new development must respect and positively contribute to Lewisham's local distinctiveness, both in terms of its design qualities and function.
- 13.2. To assist people with understanding and appreciating Lewisham's local distinctiveness, and to establish 'place-based' priorities for guiding investment and sensitively managing growth and new development, this part of the Local Plan is organised around five character areas. These areas contain a number of smaller neighbourhoods which together share similarities that distinguish them from other parts of the Borough.<sup>35</sup> This includes similarities in the prevailing urban form, historic character, topography, landscape and other features. **Figure XX** illustrates the extent of the character areas and their neighbourhoods

### MAP - CHARACTER AREAS AND NEIGHBOURHOODS

- 13.3. Each character area will play an important role in supporting the delivery of the Borough's spatial strategy, helping to accommodate growth that meets local needs (such as for genuinely affordable housing, new workspace and supporting infrastructure). To set clear expectations in this respect, and to ensure that new development is sensitively integrated into our neighbourhoods, the Local Plan sets out a future vision and place principles for each area. These should be used to inform investment decisions and guide development proposals.
- 13.4. In addition, each character area is accompanied by site allocation policies. These establish land use principles and design guidelines for strategic development sites. These sites have been included within the Local Plan because they are considered necessary to support the delivery of the spatial strategy for the Borough.
- 13.5. We have published, and are in the process of preparing, additional guidance to help realise the vision for the character areas and to support implementation of their place principles. This includes supplementary planning documents and masterplans that all new development proposals will be expected to have regard to and positively engage with. Some of the key guidance documents for Lewisham's character areas are signposted throughout the following section.

Lewisham in the context of London

- 13.6. It is recognised that neighbourhoods and communities are defined around different geographies and social contexts, and that people's sense of place is not solely

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<sup>35</sup> The setting of the character areas has been informed by the Lewisham Characterisation Study (2019), which should be referred for further information. We acknowledge the neighbourhood boundaries overlap with each other, and that communities may define themselves around different geographies and social contexts. However, the organisation of the Borough in this way provides a useful starting point for a place-based planning and delivery framework.

shaped by the extent of Lewisham’s administrative boundaries. Places and spaces beyond the Borough also contribute to local distinctiveness and influence the way in which people relate to their surroundings. The vision and place principles for each character area are therefore informed by Lewisham’s relationships with other London boroughs, particularly those adjoining it.

- 13.7. The overarching objective for “An Open Lewisham as part of an Open London” reflects our commitment to strengthening relationships with the rest of the Capital. This will not only promote inclusive communities but is necessary to support the delivery of the London Plan’s spatial development strategy. The Local Plan sets out a shared vision for how Lewisham’s character areas should evolve over time, building on their functional relationships with other parts of London. This includes, for example, cross-boundary relationships established through transport connections and the public realm, the network of green infrastructure (including open spaces and waterways), town centres and the local economy. As well, the character areas will be influenced by their changing sub-regional context, including significant new development delivered in Opportunity Areas near the Borough, such as Canada Water and Old Kent Road in Southwark and at Greenwich Peninsula.

### Delivering the spatial strategy and meeting local needs

- 13.8. In order to support the delivery of the spatial strategy for the Borough, the Local Plan includes site allocation policies. These are planning policies for strategic development sites whose delivery is necessary to secure new investment in Lewisham, and to address identified needs for housing, workspace and town centre uses, including community facilities, within our neighbourhoods. The site allocations will also ensure that growth and development is effectively coordinated over the long-term, so that new investment benefits residents and neighbourhoods throughout the Borough. All of Lewisham’s character areas will play a role in facilitating Good Growth, and site allocations are therefore included within each.

<b>Site allocations – indicative delivery outcomes</b>			
Character area	Houses (net units)	Workspace (net floorspace sqm)	Town centre uses (net floorspace sqm)
Central	7,881	52,444	10,738
North	10,520	-51,427	92,331
East	1,063	3,603	-1,966
South	2,093	8,731	-16,601
West	859	1,817	1,912
<b>Total</b>	<b>22,416</b>	<b>15,167</b>	<b>86,413</b>

# 14 Lewisham's Central Area

## Context and character

- 14.1. Lewisham's Central Area contains the neighbourhoods of Lewisham, Hither Green and Catford. It has a strong relationship with the Ravensbourne, Pool, and Quaggy rivers and their river valley corridors. The housing character is generally varied as a result of post-WWII patterns of development, with conservation areas and listed buildings within and adjacent to the area. The Central Area contains the linked but complementary major centres of Lewisham and Catford.
- 14.2. The character of Lewisham major centre and its surrounds is strongly informed by its shopping and leisure destinations, as well as its and highly active public places, including the strategic rail interchange. It has an urban scale with a tall buildings cluster surrounded by a lower density grid of residential terraces. Many sites have recently been redeveloped with high quality designs. However much of the town centre remains fragmented and disconnected as a result of larger sites and blocks, with areas of poorer quality public realm including the pedestrian and cycle environment, particularly on Lewisham High Street. Many of the older sites have a poor quality retail and leisure offer. Significant redevelopment opportunities exist alongside planned strategic transport investment that will allow the character of Lewisham to be 'reimagined'.
- 14.3. Catford major centre comprises the civic hub of the Borough with a key focal point at the historic Broadway Theatre. The town centre has a generally urban scale that is surrounded by smaller scale residential areas and high quality open spaces. Many key sites have recently been redeveloped to a high quality design standard. However the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre has led to high levels of severance with the town centre and its surrounds, and poor permeability and legibility, especially in the main shopping area. Generally there is a poor pedestrian and cycle environment particularly along the South Circular. Significant redevelopment opportunities exist alongside planned strategic transport investment that will allow the character of Catford to be 'reimagined'.
- 14.4. The A21 corridor is currently dominated by traffic with a poor quality public realm and pedestrian and cycle environment. The High Street is generally not well connected with a finer grained network of streets and paths to its surrounding neighbourhoods, and is dominated by larger sites and blocks leading to irregular east-west connections. Whilst the character of the corridor is well established around Lewisham Hospital (with opportunities to 'reinforce' the existing character), opportunities exist for intensification along the majority of the corridor. Hither Green is characterised by predominantly smaller scale historic residential areas. There is a poor sense of arrival to the immediate west of the train station with limited links across the railway. Opportunities exist for sensitive infill and high quality small sites development to 'reinforce' the existing local character.

## Vision

By 2040...

- 14.5. The Central Area will realise its potential as one of London's key strategic locations for growth and regeneration, with significant new development successfully integrated with existing places and communities to create high quality, inclusive, healthy and liveable neighbourhoods. The arrival of the Bakerloo line extension together with the modernisation of Lewisham interchange will have a transformative effect, unlocking the development potential of sites and improving accessibility within the area, as well as connections to it. The linked but complementary town centres of Lewisham and Catford will benefit from significant new investment and housing development, enhancing their vitality and strengthening the role they play within London and the wider southeast as key visitor destinations and focal points for community, cultural, civic and commercial activity.
- 14.6. The coordinated and comprehensive development of key strategic sites, along with the modernisation of Lewisham interchange, will shape Lewisham major town centre into a metropolitan centre of exceptional quality. It will feature a distinctive character and urban qualities, with new development helping to create a coherent transition from the centre to the surrounding residential areas. The town centre will be better integrated into the neighbourhood. Visitors will benefit from new and improved walking and cycling corridors and accessible links between key destinations, including east-west routes through a renewed Lewisham Shopping Centre, and an enhanced Waterlink Way along the River Ravensbourne as a defining local feature. Lewisham market will remain at the heart of the town centre, and a unique destination in London, with its long term viability secured through sensitively integrated public realm enhancements.
- 14.7. The comprehensive redevelopment and regeneration of Catford major centre will be delivered through a masterplan approach. This will secure its long term vitality and viability, whilst reinforcing and enhancing its role as the Borough's main civic hub, with a complementary cluster of cultural and commercial activities. Regeneration of the town centre will be enabled through
- 14.8. Development of an urban scale will create a thriving neighbourhood with a unique sense of place and strong civic and cultural identity, building on the presence of local assets including the Broadway Theatre. The South Circular road will be realigned, creating a cohesive town centre and improved accessibility along the station approach, to Catford and Catford Bridge train stations. Heritage-led regeneration of the town centre will help to re-introduce the historic lanes, making the centre more permeable and reinforcing the role of The Broadway as key destination and focal point of activity. Public realm enhancements will dramatically improve the environment for pedestrians and cyclists, and create better links to open spaces and the river corridor. Catford will have a thriving local economy, supported by its civic and cultural offer as well as the introduction of new and improved workspace. Key development sites will be delivered to 'reimagine' the character of the area, and revitalise the town centre and its surrounds in a coordinated manner.
- 14.9. The A21 corridor will become a new compact, high quality residential neighbourhood with a unique sense of place, making travel between Lewisham

and Catford easier and more intuitive. Clusters of development at an urban scale around the main road junctions with the A21 will provide rhythm to the corridor. The network of smaller connector streets that feed into the A21 will be improved, providing clear and logical access and crossing points. Enhanced links between the A21 and the river corridor will provide a landscaped presence in parallel to the more urban environment of the A21. Key development sites along the A21 corridor will be delivered to 'reimagine' the character of the area, and remake the corridor as a new place in a coordinated manner. Hither Green's existing character will be reinforced with sensitive infill and small scale development reflecting the historic built environment and diverse land uses. An enhanced sense of arrival will be created to the west of the train station, with improved links across the railway line. Across the area work to re-naturalise the river corridor and improve access to and along it will continue alongside coordinated investment in new and improved public and open spaces.

- 14.10. The whole area will benefit from the delivery of new and improved public realm, accessible open spaces and a re-naturalised river corridor, both for the Rivers Ravensbourne and Quaggy.

#### MAP: CENTRAL AREA KEY DIAGRAM

### LCA1 Central Area place principles

- A. Development proposals must make the best use of land in helping to facilitate Good Growth and ensuring that the regeneration potential of the Opportunity Area<sup>36</sup> is fully realised. This will require that investment is appropriately coordinated within Lewisham's Central Area and that:
- a. A significant amount of new development is directed to the major town centres of Lewisham and Catford, and along the A21 corridor linking the centres, including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;
  - b. New employment development is concentrated within town centres and the Bromley Road Strategic Industrial Location;
  - c. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, along with improving the environmental quality of employment locations;
  - d. The out-of-centre Retail Park at Bromley Road is comprehensively redeveloped for a wider mix of complementary uses; and
  - e. Land is safeguarded to secure the delivery of strategic transport infrastructure, in line with **Policies TR1 (Sustainable transport and movement)** and **TR2 (Bakerloo line extension)** including:
    - i. Bakerloo line extension;
    - ii. Lewisham station interchange; and
    - iii. Realignment of the South Circular road.
- B. Development proposals will be expected to facilitate growth and investment within the Central Area whilst enhancing its place qualities by supporting:

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<sup>36</sup> Refers to the New Cross / Lewisham / Catford Opportunity Area, as established by **draft** London Plan policy SD1 (Opportunity Areas).

- a. Lewisham major centre's transition to a metropolitan centre of sub-regional significance, having regard to Policy LCA2 (Lewisham major centre and surrounds);
  - b. The comprehensive regeneration of Catford major centre, reinforcing its role as the Borough's principal civic and cultural hub, having regard to Policy LCA3 (Catford major centre and surrounds); and
  - c. The transformation of the A21 corridor and its immediate surrounds into a series of healthy neighbourhoods with a distinctive urban character, and reinforcing its role as a strategic movement corridor for sustainable transport modes, having regard to Policy LCA4 (A21 corridor).
- C. Development proposals should help to ensure the Central Area benefits from a high quality network of connections and routes that better link neighbourhoods and places, including green spaces, having regard to Policy LCA5 (Central Lewisham Links).
- D. Hither Green will be designated as a local centre reflecting the role it plays in the provision of local services and community facilities, along with its accessible location near Hither Green station. To help secure the long-term viability of the local centre, development proposals should:
- a. Enhance the character and accessibility to and along the station approach and the centre, including by improving public realm and the legibility of pedestrian and cycle routes; and
  - b. Facilitate the renewal of non-designated employment sites in proximity to the station to secure a complementary mix of commercial and other uses.
- E. The distinctive character of the residential hinterland within Catford, Lewisham and Hither Green will be reinforced. To help meet the Borough's future needs, particularly for housing, sensitively designed and high quality development on small sites (such as infill and backland sites) will be supported.
- F. The river valley network is a defining feature of the Central Area which development proposals should positively respond to by:
- a. Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise;
  - b. Ensuring the layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them; and
  - c. Facilitating the provision of new and enhanced connections to and along the rivers and river valleys, including by extending and improving the Waterlink Way. Walking and cycling links to the river from the town centres of Lewisham and Catford, and the A21 corridor, will be strongly supported
- G. Development proposals for tall buildings in the Central Area where only be acceptable in those locations identified as being appropriate for tall buildings, having regard to the requirements of Policy QD4 (Building heights).

- H. The council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the Central Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer to and positively engage with these documents, including:
- a. Lewisham Characterisation Study (2019);
  - b. Catford Town Centre Masterplan (Forthcoming);
  - c. A21 Corridor Intensification and Development Strategy (Forthcoming); and
  - d. River Corridor Improvement Plan SPD (2015).

### LCA2 Lewisham major centre and surrounds

- A. Continued investment in Lewisham major centre to enable its transition to a metropolitan centre of sub-regional significance in London, and a gateway to the south east, is a strategic priority. To realise this objective and secure the centre's long-term vitality and viability, development proposals must contribute to a coordinated process of transformational improvement to the town centre environment. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant commercial role is maintained and enhanced.
- B. Development proposals will be expected to help facilitate the delivery of strategic transport infrastructure necessary to ensure the centre can effectively serve, and benefit from, a wider sub-regional catchment and to support Opportunity Area objectives. This includes the Bakerloo line extension, Lewisham station interchange, land required for bus services and pedestrian and cycle routes. Detailed site specific requirements are set out in the site allocation policies for the Central Area.
- C. Development proposals should positively respond to the evolving urban scale and character of the centre and its surrounds. They must be designed with particular reference to their relationship with existing clusters of tall and taller buildings, the prevailing townscape and skyline, having regard to [Policy QD4 \(Building heights\)](#). Development should also be designed to provide an appropriate transition from the surrounding residential neighbourhoods, its edges and into the heart of the town centre, with generous setbacks provided along main roads and other routes.
- D. Development proposals must contribute to enhancing the public realm in order to make the town centre a significantly more accessible, safer and attractive environment for pedestrians and cyclists. This will require that a clear hierarchy of streets is established within the town centre and its surrounding neighbourhoods, along with a cohesive and legible network of routes running through and connecting key strategic sites, commercial destinations and public open spaces. Particular consideration will need to be given to movements to and from Lewisham station interchange, connecting Silk Mills Path and residential neighbourhoods to the north, and Lewisham Gateway and the wider town centre area to the south.

- E. Development proposals should be designed to improve access and permeability in the town centre and its surrounding area, particularly where sites are to be delivered through comprehensive redevelopment. This includes new or enhanced east-west routes through the Lewisham Shopping Centre site, along Loampit Vale and Thurston Road, and from Silk Mills Path to Connington Road and Lewisham Road.
- F. Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes improved access to the River Ravensbourne by extending and enhancing Waterlink Way that traverses the wider town centre area, and the River Quaggy at Lee High Road. Proposals should make provision for attractive and robust embankments as a central design feature, particularly along the River Ravensbourne to enhance connections from Silk Mills Path to Lewisham transport interchange and the Lewisham Gateway site, leading to the town centre and the Primary Shopping Area.
- G. Lewisham Market is at the heart of the town centre and will be protected as an important commercial destination and visitor attraction. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making provision for facilities for traders. Effective management of the market and associated public realm will be essential to its long-term viability, and the council will work with stakeholders to secure appropriate management arrangements.
- H. Within the designated town centre area and at its edges, development proposals must provide for an appropriate mix of main town centre uses at the ground floor level. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary commercial, leisure and cultural uses elsewhere. Night-time economic activities will be supported where they positively contribute to the local area.
- I. Positive and active frontages will be required at the street level, particularly along Lewisham High Street, Molesworth Street, Rennell Street and Lewisham Grove – which together help to frame the Primary Shopping Area – as well as Loampit Vale, Lee High Road and Lewisham Road. In order to ensure development interfaces well with the public realm, special attention should be given to design at the ground floor and podium levels of buildings. Where new housing is proposed within the town centre, this will only be acceptable on upper floor levels.
- J. To ensure Lewisham major centre's role as one of the Borough's principal commercial and employment locations, development proposals will be expected to retain or re-provide existing workspace, and deliver net increases wherever possible. A broad range of workspace typologies will be supported within the centre and its immediate surrounds, with priority given to Class B1 uses, including hybrid workspace combining office and lighter industrial workspace appropriate to the area. Provision of workspace suitable for small businesses, including units of 500 square meters or less, will be strongly encouraged.

## LCA3 Catford major centre and surrounds

- A. Reinforcing the role of Catford major centre as Lewisham's principal civic and cultural hub is a strategic priority. To realise this objective and to secure the centre's long-term vitality and viability, development proposals must contribute to a coordinated process of town centre regeneration that positively responds to Catford's distinctive character. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant civic, commercial and cultural role is maintained and enhanced.
- B. Development proposals must be delivered through the masterplan process, in accordance with relevant site allocation policies and the [Catford Town Centre Masterplan](#).
- C. The realignment of the South Circular (A205) will be secured through a partnership approach with key stakeholders, including Transport for London. This will help to facilitate comprehensive regeneration and renewal in the town centre and its surrounds, in particular, by addressing existing issues of severance and pollution to create a more cohesive, safer, healthier and accessible town centre area. Development proposals will be expected to maximise opportunities presented by the road realignment, including through designs that provide safer access across main junctions, new and improved public realm and more accessible, high quality public open spaces.
- D. Development proposals should positively respond to the evolving urban scale and character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass and height between the centre, its edges and surrounding residential neighbourhoods.
- E. Development proposals must contribute to enhancing the public realm in order to make the town centre a significantly more accessible, safer and attractive environment for pedestrians and cyclists. This will require that a clear hierarchy of streets is established within the wider town centre area, along with a cohesive and legible network of routes running through and connecting key strategic sites, commercial, civic and cultural destinations, and public open spaces. Particular consideration will need to be given to movements to and from Catford and Catford Bridge stations and along Rushey Green (A21). Careful consideration will also need to be given to the relationship between vehicular, pedestrian and cycle movements and access at Sangley, Brownhill and Plassy Roads, and the South Circular (A205).
- F. Development proposals must positively respond to the historic and cultural character of the town centre and its surrounds, and preserve or enhance the significance of heritage assets, including by:
  - a. Retaining the Broadway Theatre as an integral local landmark and cultural destination within the centre. Development should be designed to ensure the

- theatre remains a prominent visual feature marking the eastern gateway to The Broadway;
- b. Designing development with reference to the historic fabric of the local area. In particular, development should seek opportunities to enhance the townscape by reinstating the network of historic lanes within the town centre; and
  - c. Addressing the relationship of new development with the Culvery Green Conservation Area to the south.
- G. Development should positively respond to the distinctive character of The Broadway, and the buildings of townscape merit that line it, and reinforce its function as a key pedestrian movement corridor and focal point of activity.
- H. Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes measures to deculvert and naturalise the River Ravensbourne near Catford and Catford Bridge Stations, and to improve public access to the Waterlink Way by repairing the existing break in the path and extending the route to join with the River Pool Linear Park. Proposals should make provision for attractive and robust embankments as a central design feature to enhance connections to town centre's western gateway, Ladywell Fields and the train stations.
- I. Catford Market forms an integral part of the town centre and will be protected as an important commercial destination and visitor attraction. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making provision for facilities for traders.
- J. Development proposals must provide for an appropriate mix of main town centre uses. Retail uses should be concentrated within the Primary Shopping Area, forming the main use across the shopping frontages, and supported with a wider range of complementary civic, commercial, leisure and cultural uses elsewhere. Night-time economic activities should help to reinforce Catford's role as an important cultural destination, and will be supported where they positively contribute to the local area.
- K. Positive frontages will be required at the street level, particularly along Rushey Green, The Broadway and within the Primary Shopping Area. Positive frontages should be integrated elsewhere within the town centre area and at its edges. In order to ensure development interfaces well with the public realm, special attention should be given to design at the ground floor and podium levels of buildings.
- L. Catford major centre is a key commercial and employment location. It has a unique civic and cultural function that distinguishes it from, and helps to complement, Lewisham major centre. Development proposals will be expected to retain or re-provide existing workspace and deliver net increases wherever possible. A broad range of workspace typologies will be supported within the centre and its immediate surrounds, with priority given to Class B1 uses, including office floorspace and hybrid workspace combining office and lighter industrial workspace appropriate to the area.

Provision of workspace suitable for small businesses, including units of 500 square meters or less, will be strongly encouraged, particularly where the space is designed to support the cultural industries.

### LCA4 A21 corridor

- A. The transformation of the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road) and its immediate surrounds into a series of liveable and healthy neighbourhoods with a distinctive urban character is a strategic priority. Development proposals should make the best use of land to enable delivery of high quality, mixed-use residential quarters within this Central Area location. They should also reinforce and enhance the corridor's movement function, ensuring it supports a wider network of well-connected neighbourhoods and places.
- B. Development proposals along the A21 corridor and its immediate surrounds should enhance the place qualities of the corridor by:
  - a. Positively responding to the evolving urban character of the area, including through the sensitive intensification of strategic and other sites, having regard to the [A21 Corridor Intensification and Development Strategy SPD](#);
  - b. Helping to establish a distinctive and legible urban grain along and around the corridor, including clusters of development of an urban scale situated at major road junctions;
  - c. Ensuring new development interfaces well with the public realm, including through the provision of positive frontages along the corridor, and active ground floor frontages incorporating commercial and community uses, where appropriate, particularly in town centres and edge-of-centre locations;
  - d. Maximising opportunities to integrate urban greening measures; and
  - e. Enhancing connections between the major centres of Catford and Lewisham, as well as neighbourhoods surrounding the corridor, through the delivery of new and improved public realm.
- C. Development proposals must reinforce the role of the A21 as a strategic movement corridor, giving priority to the safe and convenient movement of pedestrians and cyclists, as well as the use of public transport. This principal north-south route should be supported by a complementary network of legible, safe and accessible routes, including cycling Quietways, that link with it to enhance connections between neighbourhoods and places, including open spaces such as Ladywell Fields, Lewisham Park and Mountsfield Park.
- D. Development proposals should investigate and maximise opportunities to reinstate or enhance the network of finer grain east-west connections for walking and cycling to and from the A21 corridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.
- E. Development proposals on sites along the A21 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).

## LCA5 Central Lewisham Links

- A. Development proposals will be expected facilitate the creation and enhancement of the Central Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the Central area. The main strategic routes within this network are set out in **Table X** below.

Central Lewisham Links

Link route	Description	Key linkages
1		
2		
3		
4		

- B. On sites located adjacent to an existing or proposed route of the Central Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with **Policy QD3 (Public realm)** and **TR3 (Healthy streets and part of healthy neighbourhoods)**. Proposals will be expected to deliver public realm improvements to support the delivery of the Central Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:
- New or enhanced footpaths or cycleways;
  - Road realignment;
  - Street crossings or other safety measures;
  - Cycle parking;
  - External lighting;
  - Landscaping;
  - Tree planting or other green infrastructure;
  - Drinking water fountains;
  - Public conveniences;
  - Way-finding signage.
- C. To support the effective implementation of the Central Lewisham Links, development proposals will be expected to have regard to the council's Open Space Strategy.

## Site allocations

The site allocations for the Central Area will be included here. Please refer attached sites document in the interim.

# 15 Lewisham's North Area

## Context and character

- 15.1. Lewisham's North Area contains the neighbourhoods of North Deptford, Deptford, and New Cross. The waterway network helps to define the area, particularly the River Thames that establishes its northern boundary. The River Ravensbourne and Deptford Creek, the latter forming the boundary with Royal Borough of Greenwich, are also prominent physical features and reflect the Borough's unique Thames side character.
- 15.2. The North Area has a rich and varied historic environment with a number of listed buildings and conservation areas. Historic buildings and structures include churches, Georgian townhouses, Victorian terraces, industrial warehouses and railway viaducts. Local character is also strongly influenced by the historic dockyard and maritime industries, with the first residential areas developed around the Greenwich railway. The area was heavily damaged in WWII and redevelopment through the subsequent interwar and postwar periods has given rise to a mixed urban character, with a number of large estates featuring large plots and mid-rise, medium density housing, including the Pepys Estate.
- 15.3. The North Area contains much of the Borough's employment land stock, giving it a distinctive industrial character. There are designated and non-designated employment sites situated throughout, including the regionally important Strategic Industrial Location at Surrey Canal Triangle and clusters of locally significant sites around Deptford Creekside. Several larger industrial sites have recently undergone a plan-led process of regeneration. Contemporary mixed-use residential and employment schemes have been introduced, including larger tower blocks with taller elements situated on landmark sites. Continued renewal of older employment sites will influence the area's evolving character, whilst helping to improve its environmental qualities. Planning consent has been granted for major mixed-use developments at Convoys Wharf and Surrey Canal Triangle, and these schemes are likely to be delivered over the short to medium term.
- 15.4. The character of the North Area is also strongly informed by the layout of historic roads and railway infrastructure that dissect much of the area. This infrastructure contributes to severance and limits permeability and circulation between neighbourhoods and places. There are key movement corridors within the area linking to other parts of London, such as Surrey Canal Road, Evelyn Street (B200) and New Cross Road (A2). However these main routes are dominated by vehicular traffic and typically suffer from poor quality public realm, limiting their suitability for pedestrians and cyclists.
- 15.5. The historic high streets at Deptford and New Cross play a key role in shaping local character and identity. They offer provision of a rich and vibrant mix of shops, services and independent traders. Deptford market, situated at the heart of Deptford district centre, is a focal point for community activity and a well-known visitor destination. New Cross district centre is a vibrant town centre and thriving night-night hub that serves its local catchment, including a large student population. The town centres benefit from their proximity to important cultural and educational institutions, including Goldsmiths College and Trinity Laban, which exert a strong influence over the area. These institutions play a critical economic

role and have been vital to the growth of the creative and digital industries in the Borough. The North Area includes one of London's first Creative Enterprise Zones.

- 15.6. The network of green infrastructure in the North Area, including parks and open spaces, are valuable natural and recreational assets within the predominantly urban context. Many newer developments have delivered public realm improvements, opening up access to and naturalising parts of Deptford Creek and the River Ravensbourne, as well as providing improved access to the River Thames. Many neighbourhoods however have a limited number of street trees and could benefit from urban greening.

## Vision

By 2040...

- 15.7. The North Area will realise its potential as one of London's key strategic locations for growth and regeneration, with significant new development successfully integrated with existing places and communities to create high quality, inclusive, healthy and liveable neighbourhoods. The arrival of the Bakerloo line extension and station at New Cross Gate will have a transformative effect, unlocking the development potential of sites and improving accessibility within the area, as well as connections to it.
- 15.8. Regeneration will be delivered through the comprehensive redevelopment of Mixed-use Employment Locations and other sites. New high quality and mixed-use developments, such as Deptford Timberyard and Convoys Wharf, will attract investment and provide a significant amount of new homes and jobs along with community facilities and open spaces to support a growing population. A new local centre will be established at Evelyn Street, serving the existing community and new residents at Convoys Wharf, providing a focus for the neighbourhood and transition to Deptford High Street. Redevelopment of the Surrey Canal Triangle site will deliver a new station to support a mixed-use residential quarter with a community focus, and help to secure the future of Millwall Football Club with a modern stadium.
- 15.9. The historic high streets of Deptford and New Cross will remain the heart of the area's neighbourhoods. They will continue to evolve as unique and vibrant places, attracting residents as well as visitors from across London and beyond, with a rich mix of daytime and night-time economic activities that reflect the diversity of local communities. New high quality development will be sensitively integrated within and around the town centres, respecting and positively responding to the historical fabric and townscape features of the high streets. New development at New Cross and New Cross Gate stations, and along New Cross Road, will help to create a more coherent frontage that generates visual interest and street level activity. Deptford Market will thrive as an important community and economic asset.
- 15.10. Significant public realm and access improvements along and in the vicinity of New Cross Road (A2) will accompany the Bakerloo line extension, including a revamped station and forecourt at New Cross Gate. Together these improvements will address local issues of severance and congestion, transforming the A2 corridor into a Healthy Street. This will make movement by walking, cycling and

public transport safer, more convenient and pleasant. Elsewhere, investment in pedestrian and cycle routes will enhance connections throughout the North Area, building on the success of the North Lewisham Links. This includes connections across railway lines, between open spaces and to other key destinations such as transport nodes, community facilities, town centres and employment locations.

- 15.11. The North Area will play an instrumental role in growing Lewisham's local economy. Provision will be made for a wide range of opportunities for jobs and training, as well as business development. Modern workspace will be delivered through the reconfiguration and intensification sites at the Surrey Canal Road Strategic Industrial Location. This will enable the delivery of a new high quality employment-led mixed-use quarter at the edges of Deptford Park and Folkestone Gardens, improving the transition between commercial activities and the surrounding residential areas. Locally Significant Industrial Sites will be revitalised, with new and improved workspace delivered through the redevelopment of buildings and sites. This includes sites at Deptford Creekside, where the mix of workspace and artists' studio space will bolster the area's new Cultural Quarter. Elsewhere, a more optimal use of land will be made through smaller scale employment development to support independent and smaller businesses. The area's railway arches, and space around railway infrastructure, will play a more integral role in this respect.
- 15.12. The North Area will cement its role as one of London's most dynamic hubs for the cultural, creative and digital industries. It will be home to a thriving Creative Enterprise Zone, with world-class education and cultural institutions central to its success. Goldsmiths College, Lewisham College, Trinity Laban Centre and the Albany Theatre, amongst other local institutions, will continue to exert an important influence in the area. They will help to foster and grow new cultural, creative and digital enterprises, many of which will continue to stay and prosper in the area, taking advantage of the wide-ranging offer of affordable workspaces and studio spaces, including at the Deptford Creekside Cultural Quarter.

#### MAP: NORTH AREA KEY DIAGRAM

### LNA1 North Area place principles

- A. Development proposals must make the best use of land in helping to facilitate Good Growth and ensuring that the regeneration potential of the Opportunity Area<sup>37</sup> is fully realised. This will require that investment is appropriately coordinated within Lewisham's North Area and that::
- a. The comprehensive regeneration of strategic sites is facilitated to deliver new urban localities that are well-integrated with existing neighbourhoods, bringing a significant amount of new housing and workspace, along with community facilities and other supporting infrastructure. This includes regeneration of the Mixed-use Employment Locations of Convoys Wharf, Oxestalls Road and Surrey Canal Triangle;

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<sup>37</sup> Refers to the New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside Opportunity Areas, as established by draft London Plan policy SD1 (Opportunity Areas).

- b. New employment development is concentrated within town centres, Mixed-use Employment Locations, Locally Significant Industrial Sites and the Surrey Canal Road Strategic Industrial Location;
  - c. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, along with improving the environmental quality of employment locations. Cultural and creative industries will be promoted, in particular, in order to enhance existing clusters of commercial activity within Lewisham's Creative Enterprise Zone;
  - d. Development proposals reinforce and enhance the integral role of the Deptford Creekside and New Cross Cultural Quarters in supporting the cultural and creative industries; and
  - e. Land is safeguarded to secure the delivery of strategic transport infrastructure, in line with [Policies TR1 \(Sustainable transport and movement\)](#) and [TR2 \(Bakerloo line extension\)](#), including:
    - i. Bakerloo line extension, including a new station interchange at New Cross;
    - ii. A new London Overground station at Surrey Canal Road; and
    - iii. River bus services at Convoys Wharf.
- B. The transformation of the New Cross Road / A2 corridor into a well-functioning and healthy street that supports a well-connected network of neighbourhoods and places will be facilitated, in line with [Policy LNA2 \(New Cross Road / A2 corridor\)](#).
- C. Development proposals should help to ensure the North Area benefits from a high quality network of connections and routes that better link neighbourhoods and places, including green spaces, having regard to [Policy LNA5 \(North Lewisham Links\)](#). Folkestone Gardens should form a central point for a series of pedestrian and cycle connections across the area, supported by public realm enhancements around the viaduct and Surrey Canal Road.
- D. Development proposals should seek to address elements of the built environment that segregate neighbourhoods and places from one another. This includes severance caused by the convergence of rail lines around Surrey Canal Road, as well as the barriers to movement around other major roads, such as New Cross Road and Evelyn Street (A200).
- E. Heritage-led regeneration will be vital to delivering high quality and distinctive neighbourhoods across the North Area. Development proposals should address the historic environment as an integral part of the design-led process. Opportunities should be taken to preserve, better reveal and reinstate heritage assets and features that contribute to the area's character and identity, particularly where sites are delivered comprehensively through the masterplan process. This includes heritage assets associated with:
- a. Deptford's maritime and industrial heritage, including the Royal Naval Dockyard;
  - b. The route of the Grand Surrey Canal, particularly by helping to facilitate the delivery of the Surrey Canal Linear Walk along with improving access to it; and
  - c. The historic fabric and grain of the high streets at Deptford and New Cross.

- F. The River Thames and Deptford Creek are defining features of the North Area which development proposals should positively respond to, having regard to [Policy LNA4 \(Thames Policy Area and Deptford Creekside\)](#). Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment, including by facilitating the provision of new and enhanced connections to and along the waterfront, particularly the Thames Path and Waterlink Way at Deptford Creek.
- G. Development proposals should positively respond to the historic and cultural character of New Cross and Deptford district town centres. A wide range of commercial, cultural and community uses will be supported within the centres, helping to ensure their long-term viability and broadening their role as key nodes of employment generating activity within the Creative Enterprise Zone.
- H. Development proposals should reinforce and enhance the role of New Cross and Deptford Cultural Quarters by supporting and enabling the clustering of complementary cultural, community and commercial uses within these locations, having regard to [Policy EC 18 \(Culture and the night-time economy\)](#).
- I. Deptford market and market yard are at the heart of the Deptford district town centre and will be protected as an important commercial destination and visitor attraction. Development proposals should assist in securing the long-term viability of the market by protecting and enhancing its amenity, delivering public realm and access improvements, and making provision for facilities for traders.
- J. The council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the North Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer and positively engage with these documents, including:
- a. Lewisham Characterisation Study (2019);
  - b. New Cross Area Framework and Station Opportunity Study (2019);
  - c. New Cross Gate Station SPD (forthcoming);
  - d. Surrey Canal Triangle SPD (forthcoming); and
  - e. River Corridor Improvement Plan SPD (2015).

### **LNA2 New Cross Road / A2 corridor**

- A. Development proposals should be designed to facilitate the transformation of the New Cross Road / A21 corridor into a well-functioning and healthy street, with a distinctive historic and cultural character. Proposals should make the best use of land to enable the delivery of a high quality, lively and thriving high street. They should also reinforce and enhance the corridor's movement function, ensuring it supports a wider network of well-connected neighbourhoods and places.

- B. Development proposals along the New Cross Road / A2 corridor and its surrounds should enhance the place qualities of the corridor by:
- a. Positively responding to heritage assets, including the historic character and urban grain of New Cross Road and its wider setting;
  - b. Reinforcing the predominant commercial function and distinctive identity of the high street, taking opportunities to introduce a wider and richer mix of uses into the area;
  - c. Enhancing the continuity of the high street from Old Kent Road to Deptford by repairing breaks and activating frontages, particularly through the retention and introduction of commercial, cultural and community uses at the ground floor level;
  - d. Improving relationships between the northern and southern sides of New Cross Road to create a more cohesive high street, including through public realm enhancements that reduce barriers to movement and enable safe access along and across the road;
  - e. Delivering public realm improvements that make the corridor a more accessible and welcoming place;
  - f. Maximising opportunities to integrate urban greening measures; and
  - g. Supporting the continued evolution of the corridor and its surrounds as a more liveable and healthy neighbourhood, including through the sensitive intensification and renewal of strategic and other sites.
- C. Development proposals must reinforce the role of New Cross Road as a strategic movement corridor, giving priority to the safe and convenient movement of pedestrians and cyclists, as well as the use of public transport. This principal east-west route should be supported by a complementary network of legible, safe and accessible routes, including cycle routes, that link with it to enhance connections between neighbourhoods and places. This includes connections to Deptford and New Cross district centres, New Cross and New Gate Stations, Goldsmith's College and open spaces in the surrounding area, such as Bridgehouse Meadows, Fordham Park and Folkestone Gardens. Proposals will be expected to secure the continuity and extension of North Lewisham Links Route 1, which runs parallel to New Cross Road, including a new bridge over the railway at the Hatcham Works and Goodwood Road sites.
- D. A partnership approach will be pursued to help facilitate the transformation of the New Cross Road / A2 corridor into a healthy street, particularly to deliver strategic transport infrastructure and public realm improvements, including:
- a. A new high quality station interchange at New Cross Gate, necessary to secure the delivery of the Bakerloo line extension and significantly improve interchanges between walking, cycling and different public transport modes;
  - b. Interventions to support a rebalancing of New Cross Road to prioritise pedestrian and cycle movements, including by widening pavements and reducing pinch-points; and
  - c. Improvements at key junctions to enhance safety for all road users, including at Amersham Gyratory.

- E. Development proposals on sites along the New Cross Road / A2 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).

### LNA3 Creative Enterprise Zone

- A. A Creative Enterprise Zone (CEZ) is designated in Lewisham's North Area. The CEZ reflects the presence of significant clusters of creative and cultural industries and institutions in the area, the positive contribution they make to Lewisham's distinctive character, and the need to expand on their role as a catalyst for local economic and cultural development.
- B. To enhance existing clusters of creative and cultural industries in the CEZ, and to facilitate the creation of additional clusters, new high quality workspace and facilities will be secured through:
- The regeneration of Mixed-use Employment Land;
  - Retaining and enhancing workspace provision at Deptford Creekside;
  - Focused renewal of industrial sites located at the convergence of Grinstead and Trundleys Roads to establish a revitalised employment-led mixed-use quarter; and
  - Promoting a wide range of complementary commercial, cultural and community uses within and around New Cross and Deptford district town centres, including night-time economic activities.
- C. The continued growth and evolution of the creative and cultural industries within the CEZ will be supported, in particular, by:
- Ensuring that new development proposals protect existing business floorspace and contribute to making provision for a wide range of workspace and facilities, at an appropriate range of rents. Proposals incorporating an element of affordable workspace catered to micro, small and medium sized businesses, including start-ups, will be considered favourably;
  - Ensuring new development proposals are designed to enable full-fibre, or equivalent infrastructure, connectivity to all end users;
  - Encouraging the temporary use of vacant buildings and sites for creative workspace and cultural activities; and
  - Building on the vital role of the area's cultural and education institutions in supporting the local economy, and seeking to strengthen their beneficial relationships with Lewisham's creative and cultural industries.
- D. Within the CEZ, development proposals involving the loss of B1 Use Class workspace that is currently occupied by, or suitable for, uses in the creative and cultural industries, including artists' workspace, will be strongly resisted., Proposals involving the redevelopment of this type of workspace will be required to:
- Ensure that an equivalent amount of B1 Use Class workspace is re-provided within the proposal (which is appropriate in terms of type, use and size), incorporating existing businesses where possible; and
- Include an element of affordable workspace, in line with [Policy EC4 \(Providing suitable business space and affordable workspace\)](#).

## LNA4 Thames Policy Area and Deptford Creekside

- A. Development proposals must positively respond to the distinctive character and environmental qualities of the River Thames and Deptford Creek. They should also support and seek to maximise the multifunctional social, economic and environmental benefits of the watercourses, having regard to [Policy SD9 \(Water management\)](#).
- B. Development proposals on sites within the designated Thames Policy Area, and adjacent to Deptford Creek, will be expected to address the watercourse as an integral part of the design-led process. New development should help to reinforce and enhance the site's relationship with the River Thames and Deptford Creek, including by:
- a. Maintaining and enhancing the ecological quality and nature conservation value of the river or creek and its corridor, including the walls and foreshore;
  - b. Maximising opportunities to enhance the aesthetic value of the watercourse and visual amenity provided by it, having particular regard to:
    - i. Views, vistas, landmark features and other points of interest;
    - ii. Building lines, along with the orientation and spacing between buildings; and
    - iii. Physical connections to the river or creek, including pedestrian and cycle routes that enable access to the waterfront;
  - c. Addressing the river or creek as an important part of the public realm and contributing to the liveliness of the waterfront. Development should incorporate positive frontages and, where appropriate, accessible public spaces or facilities at the ground floors of buildings and their forecourts, particularly along the Thames Path and Waterlink Way;
  - d. Maintaining the stability of the flood defences and investigating opportunities to retreat flood defences, particularly to increase flood storage, enhance biodiversity and enhance visual connections with the river or creek;
  - e. Resisting encroachment into the creek or river and foreshore; and
  - f. Making provision for an appropriate mix of uses on sites, along with enabling river-related and marine uses, where appropriate, in line with other policies.
- C. Development proposals on sites within the Thames Policy Area, and adjacent to Deptford Creek, must preserve or wherever possible enhance the significance of heritage assets and their setting. This will require that particular attention is given to the maritime and industrial heritage of the area, and that opportunities to preserve or reinstate heritage assets are investigated and implemented.

### MAP – THAMES POLICY AREA BOUNDARY

#### Explanation

- 15.13. The River Thames is a strategically important and iconic feature of London. It has a distinctive character and unique qualities that make a special and positive contribution to Lewisham. The London Plan directs boroughs to designate a Thames Policy Area within their local plans, where appropriate, and to set detailed policies for managing development within it.

- 15.14. All new development should respect the local character of these riverside features in line with London Plan policy, which seeks the protection of the character of landscapes, buildings and places on the Blue Ribbon Network. The River Thames in the Borough has several important functions to play in terms of potential contribution to transport, contribution to nature conservation interest, flood defence, archaeology and other heritage assets. It is a Site of Importance for Nature Conservation of Metropolitan Importance and an Area of Archaeological Priority. These interests should be protected and enhanced by new development.
- 15.15. Deptford Creek, and the sites adjacent to it, represent a valuable historical, ecological and heritage asset for the Borough which will be protected. A conservation area was declared at Deptford Creekside in 2012, which recognises that the area retains a special old industrial character which should be preserved in future development. The Creek itself is a Site of Importance to Nature Conservation of Metropolitan Importance. The Creek walls are an important flood defence which have been managed in places to also enhance the ecological value of the Creek.
- 15.16. The Marine Management Organisation (MMO) should be referred to for guidance on any planning activity that includes a section of coast or tidal river. All planning decisions that relate to the UK marine area must be made in accordance with the UK Marine Policy Statement. The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations (as amended). Early consultation with the MMO is advised.

### LNA5 North Lewisham Links

- A. Development proposals will be expected facilitate the creation and enhancement of the North Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the North area. The main strategic routes within this network are set out in **Table X** below.

North Lewisham Links

Link route	Description	Key linkages
1		
2		
3		
4		

- B. On sites located adjacent to an existing or proposed route of the North Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with **Policy QD3 (Public realm)** and **TR3**

(Healthy streets and part of healthy neighbourhoods). Proposals will be expected to deliver public realm improvements to support the delivery of the North Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:

- a. New or enhanced footpaths or cycleways;
- b. Road realignment;
- c. Street crossings or other safety measures;
- d. Cycle parking;
- e. External lighting;
- f. Landscaping;
- g. Tree planting or other green infrastructure;
- h. Drinking water fountains;
- i. Public conveniences;
- j. Way-finding signage.

C. To support the effective implementation of the North Lewisham Links, development proposals will be expected to have regard to the council's Open Space Strategy.

### Site allocations

The site allocations for the North Area will be included here. Please refer attached sites document in the interim.

# 16 Lewisham's East Area

## Context and character

- 16.1. Lewisham's East Area comprises the neighbourhoods of Blackheath, Lee and Grove Park. It is made up of historic villages that formed along the route to Greenwich, which expanded dramatically with the arrival of the railways. Burnt Ash Hill is an important historic north-south route that connects from Blackheath to Lee. The area forms the eastern edge of the Borough and this is reinforced by the continuous stretch of green and open spaces that run from the riverside and Blackheath in the area's north to Elmstead Wood in the south. This network of green infrastructure, including the Green Chain Walk connecting green spaces, is one of the area's defining features.
- 16.2. The East Area has a predominantly suburban character. This is reflected by the built form and layout of the Victorian terraces, the formal historic village of Blackheath, Georgian and Regency villas, as well as 20<sup>th</sup> century housing, interwar homes and council estates. Residential developments typically feature wide plots, large gardens and generous street sections. The area's neighbourhoods are therefore some of the lowest density in the Borough.
- 16.3. The East Area contains the district centres of Blackheath and Lee Green. Blackheath is a significant historic area whose character centres on its heritage assets and strong village identity, along with the open expanses of the heath. Blackheath town centre serves a generally local function although its rich character and village qualities make it a visitor destination, with an active evening economy. Lee Green is one of the Borough's smallest district centres a serves its local catchment with a mix of shops and services. It includes several large format retail units and the Leegate Shopping Centre, the latter of which was built in the 1960s and following a planning application, a resolution is in place for its redevelopment. The centre suffers from areas of poorer quality public realm, with two busy roads forming a junction that dominates the centre of the high street, and is not performing as well as others in the Borough.
- 16.4. Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular. Baring Road is a key route within the neighbourhood, as well as the historic corridor of Burt Ash Road, although these routes are dominated by vehicular traffic and have a generally poorer public realm, limiting opportunities for pedestrian and cycle movement. Grove Park station and the local centre comprise a gateway and focal point in the neighbourhood.
- 16.5. The Quaggy River, the upper reaches of which are known as Kyd Brook, passes through parts of Lewisham's East Area at Chinbrook Meadows in Grove Park and Lee Green. At Chinbrook Meadows, the river channel has been naturalised with river banks reintroduced to encourage wildlife. Much of the subsequent length of the river to the boundary with the London Borough of Bromley is within concrete channels, or has been culverted.

## Vision

- 16.6. By 2040 the East Area will continue to feel like a series of distinct villages within a linked network of green space extending from Grove Park to Greenwich. The character of Blackheath as both an open space and historic village will be preserved and enhanced, so that it continues to be one of the borough's most iconic places, strengthening its role as a unique destination within London and the southeast. The district centre of Blackheath will be enhanced to ensure that the historic centre is resilient to the intensity of use it attracts from the large number of visitors and tourists, with reduced street clutter and improved public realm. Blackheath will continue to be protected and enhanced as one of the boroughs most important open spaces. Improvements to sustainable forms of transport will make public transport, walking, and cycling a more attractive option, reducing the impact of traffic on the historic centre and improving air quality and reducing noise.
- 16.7. New development in Lee will make more efficient use of strategic sites including the Leegate Centre, Sainsburys site, and various garage sites across the area, as well as providing new homes and supporting the provision of civic infrastructure for residents. Lee Green will support a more intense form of development, with proposals that seek to re-examine the character of the area. The area around Lee station will see development that seeks to reinforce the existing character through sensitive small scale and infill development.
- 16.8. Environmental improvements to the crossroads of the A20 and Burnt Ash Road, combined with public realm improvements elsewhere including street planting will re-balance the area towards pedestrians, changing perceptions so that Lee Green is seen as a meeting point, reducing the dominance of cars and traffic and making the town centre more pedestrian friendly. The conservation area will be protected and enhanced through smaller scale sensitive infill development, with additional tree planting on roads and public spaces.
- 16.9. The South Circular will benefit from environmental improvements that will re-purpose the road to become a pedestrian-friendly green boulevard, unlocking new development along the road. Key corridors for intensification including Lee High Road and Baring Road will accommodate new development, which will provide for a mix of uses, including new homes and mixed-use developments at an urban scale. The public realm along these key corridors will be improved, providing better access for pedestrians and cyclists.
- 16.10. The character of Grove Park will be re-examined and new development will lead to the intensification of residential and mixed-use sites at an appropriate scale within the town centre and in the vicinity of the train station. New access points across the railway lines will improve permeability and access to parks and open spaces, with new tree planting on key streets around the train station and bus garage. As an important historic asset the character and setting of the Chinbrook Estate will be protected and enhanced.
- 16.11. The Quaggy River will be re-naturalised and will become more accessible, allowing more people to enjoy this historic and valuable linear open space. A network of parks and open spaces will be developed, with improved pedestrian and cycle accessibility.

## MAP: EAST AREA KEY DIAGRAM

### LEA1 East Area place principles

- A. Development proposals must make the best use of land in helping to facilitate Good Growth, including through the focussed renewal of town centres and strategic sites. This will require that investment is appropriately coordinated within Lewisham's East Area and that:
- The comprehensive redevelopment of strategic sites, and the renewal of other sites, within and around Lee Green district town centre is facilitated to secure the centre's long-term vitality and viability and to enhance its role as key focal point for community activity, in line with [Policy LEA2 \(Lee Green district centre and surrounds\)](#);
  - The renewal of sites at Grove Park and Hither Green local centres and their surrounds, including the station approaches, is facilitated to support the long-term vitality and viability of the centres;
  - Burnt Ash local centre plays a more prominent role in supporting the local area with provision of modern workspace, services and community facilities;
  - New employment development is concentrated within town centres and the Locally Significant Industrial Sites at Blackheath Hill and Manor Lane; and
  - Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, including through the co-location of employment and other compatible uses on LSIS, along with improving the environmental quality of employment locations.
- B. Development proposals affecting the Maritime Greenwich World Heritage Site Buffer Zone must protect and preserve the significance, integrity and authenticity of its 'Outstanding Universal Value', as well as its setting and the views to and from it, in line with [Policy HE2 \(Designated heritage assets\)](#).
- C. Development proposals should positively respond to the historic and village character of Blackheath district centre and its wider setting, as well the architectural qualities of buildings that contribute to its local distinctiveness. A wide range of commercial, cultural and community uses will be supported within the centre in order to secure its long-term vitality and viability. A carefully managed approach to new development will be taken to maintain the centre's village character and reinforce its role in supporting the visitor and night-time economy, whilst ensuring the locality benefits from a high standard of amenity.
- D. The transformation of the South Circular (A205, Baring Road) and Lee High Road (A20) into well-functioning and healthy streets that support a well-connected network of neighbourhoods and places will be facilitated, in line with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#). Development proposals should seek to enhance the pedestrian and cycle environment through the provision of public realm improvements and positive frontages along the roads including, where appropriate, the infilling of vacant and underused sites. Proposals that are designed to improve safe movement along and across the South Circular and Lee High Road will be strongly supported.

- E. The intensification of sites within the Lee Green district centre and those fronting the key corridors of Lee High Road (between Weigall Road and Boone Street/Old Road), Baring Road (between Grove Park station and Heather Road/Bramdean Crescent), and along the South Circular will be supported.
- F. Development proposals should seek to address elements of the built environment that segregate neighbourhoods and places from one another. This includes severance caused by the South Circular (A205) and rail lines, particularly within the northeast and southwest parts of the East Area, and well as those that establish the boundary with Lewisham's Central and South Areas.
- G. Burnt Ash will be designated as a local centre reflecting the role it plays in the provision of local services and community facilities, along with its accessible location near Lee station. To help secure the long-term viability of the local centre, development proposals should:
- a. Enhance the character and accessibility to and along the station approach and the centre, including by improving shopfronts, public realm and the legibility of pedestrian and cycle routes; and
  - b. Facilitate the renewal of employment sites in proximity to the centre and station to secure a complementary mix of commercial and other uses.
- H. The sensitive intensification of established residential neighbourhoods will be supported where new development positively responds to their distinctive local character, including the landscape setting. The council will prepare a [Small Site Guidance Supplementary Planning Document](#), which development proposals should have regard to.
- I. Opportunities should be taken to direct new investment to the Grove Park neighbourhood to address the pockets of deprivation within it, having regard to [Policy LEA3 \(Area for Regeneration, Grove Park\)](#). New development proposals should positively respond to the character and design qualities of the Chinbrook Estate.
- J. The network of green infrastructure within the East Area and its surrounds, including outside of the Borough, contributes to the area's distinctive character and environmental qualities. Development proposals should contribute to protecting and enhancing this network of green infrastructure, including by integrating greening measures that establish new linkages and greater continuity between green and other open spaces, in line with [Policy LEA4 \(Linear network of green infrastructure\)](#).
- K. Development proposals should help to ensure the East Area benefits from a high quality network of connections and routes that better link neighbourhoods and places, including green spaces, having regard to [Policy LEA5 \(East Lewisham Links\)](#).
- L. The River Quaggy is a defining feature of the East Area which development proposals should positively respond to. Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment, including by facilitating the provision of new and enhanced connections to and along the waterfront. This includes opportunities to deculvert and

naturalise the River Quaggy near Lee High Road, as well as to deliver improved access and views to it, particularly around the town centre.

- M. The council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the North Area, and to help ensure coordination in the delivery of new investment. Development proposals should refer and positively engage with these documents, including:
- a. Lewisham Characterisation Study (2019);
  - b. Small sites SPD (forthcoming); and
  - c. River Corridor Improvement Plan SPD (2015).

## LEA2 Lee Green district centre and surrounds

- A. Development proposals should contribute to securing the long-term vitality and viability of Lee Green district town centre by enhancing the place qualities of the centre, as well as reinforcing its role as a key focal point for community activity in the East Area. Development proposals must contribute to a coordinated process of town centre renewal that positively responds to the area's distinctive character. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant commercial and community role is maintained and enhanced.
- B. The comprehensive redevelopment of strategic sites within the town centre should provide a catalyst for its renewal. Development proposals on strategic sites will be expected to optimise the use of land, having regard to other Local Plan policies. Strategic sites should be delivered through the masterplan process, taking into account their relationship with adjoining and neighbouring sites, to ensure a coordinated approach to town centre renewal. This is particularly for development proposals at the Leegate Shopping Centre (site ref XX), Sainsbury's Lee Green (site ref XX) and the land at Lee High Road and Lee Road (site ref XX), which together form a central focus for renewal.
- C. Development proposals must contribute to enhancing the public realm in order to make the town centre a significantly more accessible, safer and attractive environment for pedestrians and cyclists. This will require that a clear hierarchy of streets is established within the wider town centre area, along with a cohesive and legible network of routes running through and connecting key commercial, leisure and cultural destinations, along with public open spaces. Particular consideration will need to be given to movements along and across the main junction, Lee High Road, Lee Road, Burnt Ash Road, Taunton Road, Leyland Road and Hedgley Street.
- D. Development proposals should positively respond to the evolving urban scale and character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass and height between the centre, its edges and surrounding residential neighbourhoods.

- E. Positive frontages should be integrated within the town centre area and at its edges. In order to ensure development interfaces well with the public realm, special attention should be given to design at the ground floor and podium levels of buildings.
- F. Development proposals will be expected to maximise opportunities to improve the ecological quality and amenity value of the river environment. This includes measures to deculvert and naturalise the River Quaggy and to improve public access to it.

### LEA3 Strategic Area for Regeneration, Grove Park

- A. A Strategic Area for Regeneration is designated in the Local Plan. This covers the entirety of Lewisham's South Area and parts of Grove Park neighbourhood in the East Area. A partnership approach will be pursued in order to ensure that public and private sector investment is secured within the area, and that this investment is coordinated to successfully deliver regeneration in collaboration with local communities.
- B. Development proposals and stakeholders should seek opportunities to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation and the need for regeneration in this area, taking into account policies for the wider Strategic Area for Regeneration in the Borough's south, as set out in [Policy LSA2 \(Strategic Area for Regeneration\)](#).

### LEA4 Linear network of green infrastructure

- A. The East Area contains a linear network of green infrastructure that will be protected and enhanced, in line with other Local Plan policies. Development proposals should positively respond to the linear network of green infrastructure as a vital environmental asset within the Borough and defining feature of the Blackheath, Lee and Grove Park neighbourhoods.
- B. Development proposals should maximise opportunities to reinforce and enhance the character, amenity and environmental value of the linear network of green infrastructure, including by:
  - a. Integrating greening measures to enhance existing green linkages, and create new linkages, between the different elements of green infrastructure within the area, particularly to support the achievement of a continuous linear and connected ecological network;
  - b. Seeking opportunities to restore or introduce habitats, particularly priority habitats, to support species and enhance the biodiversity value of the network;
  - c. Maintaining and enhancing the Green Chain walk as a key route for public access to and between spaces within the network;

- d. Making provision for safe public access to and throughout the network, where appropriate, including by improving or introducing pedestrian and cycle routes, pathways and access points, such as gates; and
  - e. Ensuring that development is designed in a manner that is sensitive to character of the network and the landscape setting.
- C. The effective management of the linear network of green infrastructure, including initiatives that promote interpretation and appreciation of the network (including its local, historical and ecological significance), will be encouraged.

### LEA5 East Lewisham links

- A. Development proposals will be expected facilitate the creation and enhancement of the East Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the East area. The main strategic routes within this network are set out in **Table X** below.

East Lewisham Links

Link route	Description	Key linkages
1		
2		
3		
4		

- B. On sites located adjacent to an existing or proposed route of the East Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with **Policy QD3 (Public realm)** and **TR3 (Healthy streets and part of healthy neighbourhoods)**. Proposals will be expected to deliver public realm improvements to support the delivery of the East Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:
- a. New or enhanced footpaths or cycleways;
  - b. Road realignment;
  - c. Street crossings or other safety measures;
  - d. Cycle parking;
  - e. External lighting;
  - f. Landscaping;
  - g. Tree planting or other green infrastructure;
  - h. Drinking water fountains;
  - i. Public conveniences;
  - j. Way-finding signage.
- C. To support the effective implementation of the East Lewisham Links, development proposals will be expected to have regard to the council's Open Space Strategy.

## Site allocations

The site allocations for the East Area will be included here. Please refer attached sites document in the interim.

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# 17 Lewisham's South Area

## Context and character

- 17.1. Lewisham's South Area includes the neighbourhoods of Bellingham, Downham and Bell Green. It derives much of its character from the interwar homes constructed by the London County Council (LCC). These estates were influenced by 'garden city' principles and provide for a relatively homogenous form of low density housing throughout the area. There are clusters of higher density residential uses around Grove Park and Beckenham Hill stations, and pockets of Victorian housing in Bell Green. The South Area contains a number of historic buildings and Conservation Areas that also contribute to its local character.
- 17.2. The South Area includes the district town centre of Downham that serves the local catchment, however it has a limited range of services and convenience shopping compared to other district centres in the Borough. The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades serving the immediate localities, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of strategic development sites.
- 17.3. Many of the train stations and town centres in the South Area are poorly connected to their surrounding neighbourhoods. Good linkages between key destinations are limited, and the area suffers from low levels of public transport accessibility. Along many of the key movement corridors there is a poor public realm, including along Bromley Road, Southend Lane, Perry Hill, and Stanton Way, with many of these routes dominated by vehicular traffic.
- 17.4. The Bell Green neighbourhood is known for its out-of-centre retail park, including a superstore and other large format outlets, as well as their associated surface car parking. These retail uses are adjoined by two former gas holders, which are prominent local landmarks. Some contemporary blocks of flats have been developed on the edge of these Bell Green sites however new development has generally been delivered in a piecemeal way.
- 17.5. The South Area is characterised by its green and open spaces, including waterways. The Pool and Ravensbourne rivers run north-south through the area. The Pool River, in particular, is a key feature and provides a valuable natural corridor of significant ecological and biodiversity value, along with public access to the Waterlink Way. Beckenham Place Park is emerging as a key visitor destination in London and the wider southeast, and has recently received significant investment, including by a new outdoor swimming pond, landscape and public realm improvements.

## Vision

- 17.6. By 2040 Lewisham's South Area will have continued to protect and enhance the unique character of the LCC estates, whilst increasing the residential density of the area through sensitive infill development along key routes and in the 'left-over' spaces of the estates. Contemporary development within the LCC areas will have celebrated the garden city character and preserved the integrity of the overall

estate design, maintaining its cohesive appearance and garden city character as a unique place in London. New sensitively designed infill development and increased densities on key corridors will have made it easier to navigate the area, helping to signal the primary routes throughout the estates and the wider neighbourhood, and to guide movement between key destinations. The key opportunities for intensification will have been realised along Bromley Road, with smaller scale opportunities along Southend Lane, Whitefoot Lane, and Downham Way.

- 17.7. Alongside development within the LCC estates areas in Downham and Bellingham, the South Area will be enhanced with new town centre uses/a new town centre along Bromley Road (between Beckenham Hill Road and Aitken Road), and a renewed town centre offer in the district centre at Bellingham. New development in these key locations north and south of Bellingham station will have 're-examined' the character of the area, and be led by a comprehensive masterplan for the area. New town centre developments will take inspiration from the sense of place that the historic centre of Southend Village once had.
- 17.8. Across the South Area the town centres will be enhanced with a more diverse town centre offer and enhanced small scale employment opportunities, and all the town centres will be more easily accessible and better integrated into their surrounds. There will be a renewed sense of place at key destinations (town centres and train stations), with an improved public realm including decluttering and shopfront improvements. Improvements to sustainable forms of transport will make public transport, walking, and cycling a more attractive option in the area, with improved bus and cycle provision between the town centres and key rail stations, including at Bell Green, Downham and Bellingham.
- 17.9. By 2040 there will be a new neighbourhood at the existing Bell Green retail park and the surrounding sites. New development at Bell Green will have 're-examined' the character of the area creating a completely new place within the borough, with town centre and mixed-use residential development. The development of Bell Green will have been coordinated with investment in infrastructure and services, and will have been led by a comprehensive masterplan for the area. Development will be of a higher density and at an urban scale that optimises the use of available land, and which is in line with the accessibility of the area and the aspirations for the Bakerloo Line Extension that will provide new stations and underground access for the area.
- 17.10. Throughout the area there will be improved cycle and pedestrian links, with additional cycle lanes on key streets where the street width provides greatest opportunity. Improved pedestrian and cycle links will have strengthened the Green Chain Walk and improved the connectivity between existing green spaces, including the Pool River corridor and Beckenham Place Park, which will continue to attract investment and become a key green space of regional significance within London and the southeast. Investment in new and improved green links will mean that the residential neighbourhoods of the Southern Area will have become better integrated with key open spaces outside of the borough boundary such as Sundridge Park and Crystal Palace Park. The Pool River will be re-naturalised and will become more accessible, allowing more people to enjoy this historic and valuable linear open space.

**MAP: SOUTH AREA KEY DIAGRAM**

## LSA1 South Area place principles

- A. Development proposals must make the best use of land in helping to facilitate Good Growth and focussed regeneration, particularly to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation locally. This will require that investment is appropriately coordinated within Lewisham's South Area and that:
- The out-of-centre Retail Park, former Gas Works and other sites at Bell Green and Lower Sydenham are comprehensively redeveloped to create a new high quality residential, mixed-use quarter that is well-integrated with its surrounding neighbourhoods;
  - New development is directed to the A21 corridor (Bromley Road), including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;
  - Opportunities are taken to deliver new high quality housing, along with new or improved community facilities, through the sensitive intensification of sites within established residential neighbourhoods;
  - New employment development is concentrated within town centres and Locally Significant Industrial Sites;
  - Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, as well the redevelopment of the sites at Bell Green and Lower Sydenham, along with improving the environmental quality of employment locations;
  - Land is safeguarded to secure the delivery of strategic transport infrastructure, including the Bakerloo line extension south to Hayes, in line with [Policies TR1 \(Sustainable transport and movement\)](#) and [TR2 \(Bakerloo line extension\)](#).
- B. Development proposals on strategic and other sites within the Bell Green and Lower Sydenham area must demonstrate how they will positively contribute to a coordinated process of local area regeneration, in line with [Policy LSA3 \(Bell Green and Lower Sydenham\)](#).
- C. Development proposals should optimise the use of land and capacity of sites, taking into account the Bakerloo line upgrade and extension and other infrastructure that will enable significant future improvements to public transport accessibility levels in the South Area. The council will seek that development is appropriately phased in order to ensure there is adequate infrastructure capacity in place, including transport and community infrastructure, to cope with the additional demands generated by new development, in line with other Local Plan policies.
- D. Development proposals should positively respond to distinctive and historic character of Southend Village and its surrounds, and seek opportunities to enhance its unique place qualities and functions, having regard to [Policy LSA3 \(A21 corridor / Bromley Road\)](#).
- E. Opportunities should be taken to direct new investment to established residential neighbourhoods of Bellingham and Downham, including new high quality housing,

enhanced community facilities and public realm improvements. The sensitive intensification of these neighbourhoods, including through the infilling of sites, will be supported where new development positively responds to their distinctive local character. This includes the predominant 'garden city' principles and cottage estate character associated with the London County Council estates. The council will prepare a [Small Site Guidance Supplementary Planning Document](#), which development proposals must have regard to.

- F. Development proposals should positively respond to the role of Downham district centre in meeting the day-to-day shopping and service needs of the local area. A wide range of commercial, leisure and community uses will be supported within the centre in order to secure its long-term vitality and viability. Development proposals will be supported where they:
  - a. Retain units for appropriate main town centre uses, particularly for A1 retail uses; and
  - b. Enhance the quality of the streetscape and townscape, along with the environmental quality of the centre, including through the improvements to shopfronts and the public realm.
- G. Bellingham will be designated as a local centre reflecting the role it plays in the provision of local services and community facilities, along with its accessible location near Bellingham station and the A21 corridor. To help secure the long-term viability of the local centre, development proposals should:
  - a. Enhance access to and along the centre and station approach, including by improving public realm and the legibility of pedestrian and cycle routes; and
  - b. Enhance the character of the area through improvements to shopfronts and the renewal of employment land at the southern end of Bromley Road Strategic Industrial Location, at Randlesdown Road.
- H. Development proposals should contribute to supporting inclusive and mixed communities, including by protecting family housing and preventing against the overconcentration of Houses in Multiple Occupation in the local area, having particular regard to [Policy HO8 \(Housing with shared facilities\)](#).
- I. Development proposals should help to ensure the South Area benefits from a high quality network of connections and routes that better link neighbourhoods and places, including green spaces and waterways, having regard to [Policy LSA4 \(South Lewisham Links\)](#). Opportunities to introduce cycle routes, including Quietways, should be maximised, particularly in the established residential areas where wider street layouts are well suited to accommodating routes.
- J. Public realm and access improvements should be introduced along the A21 corridor / Bromley Road (including active frontages uses along the edge of the Bromley Road retail park and the bus garage) and in Bellingham town centre (including active frontages and shopfront improvements to the parade of shops to the east of Bellingham station and on Randlesdown Road).

- K. The South Area's network of green infrastructure, including open spaces, will be protected and enhanced, in line with other Local Plan policies. Investment at Beckenham Place Park will continue to be supported to ensure the park is maintained as a high quality open space of regional significance, and a key leisure and visitor destination in London and the wider southeast. Development proposals within the immediate vicinity of the park should provide for enhanced legibility, wayfinding and access to and from its entrances, and be designed having regard to the park's landscape and historic setting. The council will work with stakeholders to deliver flood alleviation measures at the park, in line with the River Corridor Improvement Plan SPD.
- L. The river valley network is a defining feature of the South Area which development proposals should positively respond to by:
- e. Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Pool rivers, including by naturalising the rivers, wherever opportunities arise;
  - f. Ensuring the layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them; and
  - g. Facilitating the provision of new and enhanced connections to and along, and wherever possible across, the rivers and river valleys, including by improving the Waterlink Way and access to the Pool River Linear Park.
- M. A partnership approach will be pursued to help facilitate local area regeneration, particularly to deliver strategic transport infrastructure. This includes infrastructure necessary to ensure the development potential of the Bell Green / Lower Sydenham area can be fully realised, including:
- a. The Bakerloo line extension to Hayes, including required station improvements; and
  - b. Improvements at key junctions to enhance safety for all road users, including at the Bell Green gyratory.
- N. The council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the South Area, and to help ensure coordination in the delivery of new investment. Development proposals should have regard to and positively engage with these documents, including:
- c. Lewisham Characterisation Study (2019);
  - d. A21 Corridor Intensification and Development Strategy (forthcoming);
  - e. Bell Green and Lower Sydenham Area Framework and/or SPD (forthcoming);
  - f. Small Site Guidance SPD (forthcoming); and
  - g. River Corridor Improvement Plan SPD (2015).

## LSA2 Strategic Area for Regeneration

- A. A Strategic Area for Regeneration is designated in the Local Plan. This covers the entirety of the South Area and parts of Grove Park neighbourhood in the East Area. A partnership approach will be pursued in order to ensure that public and private sector investment is secured within this area, and that this investment is coordinated to successfully deliver regeneration in collaboration with local communities.
- B. In order to tackle inequalities and the environmental, economic and social barriers that contribute to deprivation and the need for regeneration in this area, stakeholders and development proposals should seek opportunities to:
- a. Significantly improve transport accessibility in the area, particularly by:
    - i. Enhancing provision of and access to high quality public transport infrastructure, including bus services;
    - ii. Addressing barriers to movement by enhancing the network of pedestrian and cycle routes connecting to transport nodes, town and local centres, schools and training facilities, and employment locations;
  - b. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people;
  - c. Support the vitality and viability of town and local centres, helping to ensure they make provision for a wide range of accessible shops and services;
  - d. Improve the environmental quality of neighbourhoods, including by reducing and mitigating pollution along main roads and junctions;
- C. Investment to support the achievement of safe, healthy and liveable neighbourhoods within the Strategic Area for Regeneration should be facilitated through a variety of approaches, including::
- a. Partnership working with key stakeholders to secure the delivery of new and improved infrastructure, including transport infrastructure such as the Bakerloo line extension, to significantly improve access to high quality services and community facilities, along with training and employment opportunities, whether within the Borough or elsewhere in London and beyond;,
  - b. The comprehensive redevelopment of strategic sites, and renewal of town centres and employment locations, in the Bell Green and Lower Sydenham area, to help shift the focus and spread the benefits of investment southwards within the Borough;,
  - c. The sensitive intensification of sites and residential neighbourhoods, to support incremental but transformational improvement in the quality of housing and living environments.

## LSA3 Bell Green and Lower Sydenham

- A. The designation of an Opportunity Area at Bell Green and Lower Sydenham in a future review of the London Plan will be strongly supported.

- B. To help realise the growth and regeneration potential of Bell Green and Lower Sydenham, and to ensure that future development within the area supports the delivery of the spatial strategy for the Borough, the council will prepare a [Supplementary Planning Document and/or Area Framework](#). This will complement the Local Plan in setting a long-term development and investment framework for the area. Development proposals must be delivered through the masterplan process, and in accordance with relevant site allocation policies and guidance documents.
- C. To ensure that regeneration in Bell Green and Lower Sydenham is delivered through a coordinated process of targeted investment and managed change, development proposals will be required to:
- a. Safeguard the land required to secure the delivery of the Bakerloo line extension south to Hayes, and optimise the capacity of sites having regard to future improvements in public transport accessibility levels enabled by this infrastructure, in line with other Local Plan policies;
  - b. Deliver the comprehensive redevelopment of strategic sites in accordance with site allocation policies, including the former Bell Green gas holders (Site ref XX), Bell Green Retail Park (Site ref XX); and Sainsbury's Bell Green (Site ref XX);
  - c. Protect the employment function of the Locally Significant Industrial Sites at Stanton Square and Worsley Bridge Road, whilst seeking to deliver new high quality workspace, taking into account opportunities for the co-location of employment and other compatible uses;
  - d. Facilitate the delivery of public realm improvements to reduce barriers to movement, improve permeability and enhance the pedestrian and cycle environment, particularly around the Bell Green gyratory and along major routes, including the A212 (Sydenham Road, Bell Green Lane, Perry Hill), A2218 (Stanton Way, Southend Lane) and Worsley Bridge Road; and
  - e. Ensure adequate provision of infrastructure, including community facilities, taking into account existing need and any additional demand arising from new development.
- D. Development proposals should contribute to enhancing the place qualities of Bell Green and Lower Sydenham, including by:
- a. Renewing brownfield land, such as underused and vacant sites, to create a new high quality, residential-led mixed use quarter with a distinctive urban character that relates positively to its surroundings;
  - b. Ensuring that the layout and design of development improves permeability and circulation within the local area, and promotes the area's integration with surrounding neighbourhoods and places. This includes enhanced routes to Sydenham town centre and new connections to Bellingham, over the Pool River where feasible;
  - c. Integrating new publicly accessible open space into development;
  - d. Positively responding to heritage assets and their setting, including the Livesey Hall War Memorial and gardens; and

- e. Maximising opportunities to improve the ecological quality and amenity value of the river environment, including by enhancing access to Riverview Walk and Pool River Linear Park, and securing views to the Pool River.

### LSA4 A21 corridor / Bromley Road

- A. The transformation of the A21 corridor (Bromley Road) and its immediate surrounds into a series of liveable, healthy neighbourhoods with a distinctive urban character is a strategic priority. Development proposals should make the best use of land to enable delivery of high quality, mixed-use residential quarters within this South Area location. They should also reinforce and enhance the corridor's movement function, ensuring it supports a wider network of well-connected neighbourhoods and places.
- B. Development proposals along the A21 corridor and its immediate surrounds should enhance the place qualities of the corridor by:
  - a. Positively responding to the evolving urban character of the area, including through the sensitive intensification of strategic and other sites, having regard to the [A21 Corridor Intensification and Development Strategy SPD](#);
  - b. Helping to establish a distinctive and legible urban grain along and around the corridor, including clusters of development of an urban scale situated at major road junctions, particularly at Southend Lane;
  - c. Ensuring new development interfaces well with the public realm, including through the provision of positive frontages along the corridor, and active ground floor frontages incorporating commercial and community uses, where appropriate, including at Southend Village and Downham district town centre and its edges;
  - d. Maximising opportunities to integrate urban greening measures; and
  - e. Enhancing connections between neighbourhoods surrounding the corridor through the delivery of new and improved public realm.
- C. Development proposals should positively respond to the distinctive and historic character of Southend Village and its surrounds, whilst supporting the long term viability and vitality of the shopping parade by:
  - a. Enhancing the place qualities of the village by designing development to create a more coherent urban grain along Bromley Road;
  - b. Making provision for a complementary mix of main town uses along the parade at the ground floor level, with positive and active frontages; and
  - c. Enabling improved visitor access to Southend Village by enhancing the network of connections within the local area, including provision of legible and safe pedestrian and cycle routes:
    - i. Around the junctions at Beckenham Hill Road and Southend Lane/Whitefoot Lane;
    - ii. To and along Coninsborough Crescent; and
    - iii. At the pedestrian route connecting Whitefoot Lane with Beechborough Green and Gardens.
- D. Development proposals must reinforce the role of the A21 as a strategic movement corridor, giving priority to the safe and convenient movement of pedestrians and

cyclists, as well as the use of public transport. This principal north-south route should be supported by a complementary network of legible, safe and accessible routes, including cycle routes, that link with it to enhance connections between neighbourhoods and places, including open spaces such as Beckenham Place Park, Forster Park, and Downham Fields.

- E. Development proposals should investigate and maximise opportunities to reinstate or enhance the network of finer grain east-west connections for walking and cycling to and from the A21 corridor, and the river valley, particularly where sites are to be delivered through comprehensive redevelopment.
- F. Development proposals on sites along the A21 corridor and its surrounds should be designed having regard to the Healthy Streets principles, in line with [Policy TR3 \(Healthy streets as part of healthy neighbourhoods\)](#).

### LSA5 South Lewisham Links

- A. Development proposals will be expected facilitate the creation and enhancement of the South Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the South area. The main strategic routes within this network are set out in [Table X](#) below.

South Lewisham Links

Link route	Description	Key linkages
1		
2		
3		
4		

- B. On sites located adjacent to an existing or proposed route of the South Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with [Policy QD3 \(Public realm\)](#) and [TR3 \(Healthy streets and part of healthy neighbourhoods\)](#). Proposals will be expected to deliver public realm improvements to support the delivery of the South Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:
  - a. New or enhanced footpaths or cycleways;
  - b. Road realignment;
  - c. Street crossings or other safety measures;
  - d. Cycle parking;
  - e. External lighting;
  - f. Landscaping;
  - g. Tree planting or other green infrastructure;
  - h. Drinking water fountains;

- i. Public conveniences;
- j. Way-finding signage

C. To support the effective implementation of the South Lewisham Links, development proposals will be expected to have regard to the council's Open Space Strategy.

### Site Allocations

The site allocations for the South Area will be included here. Please refer attached sites document in the interim.

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# 18 Lewisham's West Area

## Context and character

- 18.1. The West Area comprises nine distinct neighbourhoods, including: Telegraph Hill, Brockley, Crofton Park, Honor Oak, Blythe Hill, Forest Hill, Perry Hill, Sydenham, and Sydenham Hill. The area comprises a series of older villages that run north south which developed around key railway stations.
- 18.2. The area is characterised by its topography and prominent green spaces with remnants of the Great North Wood. The area remains noticeably wooded, with prominent mature street and garden trees. The railway line dissects the area and limits access between many neighbourhoods. The sidings and embankments also support a significant variety of biodiversity and wildlife, which reinforce its green character. The area contains the Ravensbourne river and valley corridor, which provides an important natural corridor through the sub-area. Whilst there are many parks and open spaces, the pedestrian and cycle links between these are varied, and many open spaces are poorly connected.
- 18.3. The residential areas are predominantly low-rise with linear terraces and narrow street sections resulting in relatively high densities. The Western Area has a diverse built character that includes historic Victorian and Edwardian terraces, interwar 'garden city' inspired housing, post-war flats and council estates, and 20<sup>th</sup> century infill. The sub-area contains many conservation areas and listed buildings, which strongly inform the character of the area.
- 18.4. The sub-area contains the district centres of Sydenham and Forest Hill that have a diverse town centre offer and serve the wider neighbourhood. The local centres of XXXX and XXXX serve an important local function as part of town centre network. Some town centres (such as Ladywell) contain vacant and underused sites, and have a poor quality public realm. The area has a diverse land use mix, with a strong creative and digital industry clusters in Brockley and Forest Hill with links to Goldsmiths and Southwark College. The West Area contains the Horniman Museum which is a significant cultural destination within London and the southeast.
- 18.5. There sub-area has a number of key train stations and transport corridors, including the B218 Brockley Road/Brockley Rise and the A205 South Circular. Pedestrian and cycle accessibility is very limited along these corridors, and the public realm is generally of a poorer quality and is dominated by traffic. Whilst many train station are well positioned and accessible, a number of stations have a poor sense of arrival and are not well sited within the neighbourhood they serve

## Vision

- 18.6. By 2040 the Western Area will continue to be known as one of the greenest neighbourhoods in the borough. The distinct town centres identities will have been enhanced and strengthened making the Western Area a highly desirable place to live. Forest Hill and Sydenham will have a more diverse town centre offer and be thriving destinations serving the wider neighbourhoods, supported by stronger local centres that serve the local catchment. In all town centres vacant and underused sites will have been brought back into active uses through sensitive infill development and the reuse and redevelopment of vacant buildings.

- 18.7. Growth will be focused along the key corridors of Brockley Road/Brockley Rise and the South Circular, and within Forest Hill and Sydenham town centres, with increased density and a more urban scale 're-examining' the character of these areas. In the local centres of Brockley, Crofton Park, and Honor Oak, and in the surrounding residential neighbourhoods growth will be enabled through high quality infill development, the re-use of the existing built fabric, and through smaller site development that 'reinforces' the existing character. Development will enable the intensification of key small sites, particularly around train stations and key destinations, including around Brockley Station and Brockley Cross.
- 18.8. The area will capitalise on the many historic assets and their setting, with new heritage-led development celebrating local landmarks, historic landscapes, and local views. Across the area key public realm improvements will take place, including the greening and/or traffic calming of key routes (Ladywell Road, the South Circular, Sydenham Road, Dartmouth Road, and Brockley Road/Brockley Rise). Public realm improvements on these key routes will have led to street decluttering, improved crossings, and shopfront improvements.
- 18.9. Across the area there will be improved access for pedestrians and cyclists especially in areas with wider streets, which will include transforming the South Circular into a green boulevard with improved pedestrian, cycling, and bus provision, re-connected to the neighbourhoods along the route. There will be improved access and wayfinding to public transport nodes, and enhanced train station environs and a sense of arrival will encourage the use of sustainable forms of transport.
- 18.10. Access to the area's many green spaces will be improved and the area will celebrate its historic landscape character, woodland, and topography. The area will develop new green links with better wayfinding, with new and enhanced pockets of smaller green space, and increased street trees and front and rear garden planting. Links to significant regional parks outside the borough will have been enhanced, including to Crystal Palace and Dulwich Park. Development will have re-naturalised the Ravensbourne river and valley corridor and provide better access to and from this important natural asset.
- 18.11. Existing local employment opportunities will be protected while opportunities to deliver new employment space will be promoted. The connections between the Western Area and the Central Area will be improved to ensure residents and businesses within the sub-area have access to the facilities on offer at the borough's new metropolitan centre. The existing creative and digital industry sectors will become of strategic importance to the borough, building on the unique links to Goldsmiths College and Southwark College. The emerging creative clusters at Brockley and Forest Hill will be supported, as will form a key part of the borough's future economic growth. The Horniman Museum is a significant cultural destination. Its location and setting will be enhanced through wayfinding and accessibility improvements, increasing its prominence within its immediate surrounds, and strengthening its draw as a regional destination within London and the southeast.

#### MAP: WEST AREA KEY DIAGRAM

## LWA1 West Area place principles

- A. Development proposals must make the best use of land in helping to facilitate Good Growth, including through the focussed renewal of town centres and employment locations. This will require that investment is appropriately coordinated within Lewisham's West Area and that:
- a. The redevelopment of strategic sites, and the renewal of other sites, within and around the area's linear network of town centres is facilitated to better connect the centres and to secure their long-term vitality and viability; in line with [Policy LWA2 \(Connected network of centres\)](#);
  - b. New development within and around Forest Hill district town centre supports and reinforces the centre's role as a key commercial, community and cultural hub, in line with [Policy LWA3 \(Forest Hill district centre and surrounds\)](#);
  - c. New development is directed to the main corridors of Brockley Road (B218) and Stanstead Road (A205 / South Circular), including for high quality housing, workspace, town centre and community uses, along with supporting infrastructure;
  - d. New employment development is concentrated within town centres and the Locally Significant Industrial Sites at Endwell Road, Malham Road, Perry Vale, Clyde Vale and Willow Way;
  - e. Opportunities are taken to deliver new and improved workspace through the intensification of sites and renewal of industrial land, including through the co-location of employment and other compatible uses on selected LSIS, along with improving the environmental quality of employment locations;
  - f. The Forest Hill Cultural Quarter plays an integral and expanded role in supporting the cultural and creative industries; and
  - g. Land is safeguarded to secure the delivery of strategic transport infrastructure, including Brockley Station and Interchange, in line with [Policy TR1 \(Sustainable transport and movement\)](#).
- B. Development proposals must positively respond to the character of established residential areas. This includes the historic character of the area's neighbourhoods, and particularly their town centres which are defined by their Victorian shopping parades and make an important contribution to local distinctiveness. The historic landscape character, including woodland and topography, is also a defining feature of the West Area, which was once covered by the Great North Wood. Proposals will be expected to maximise opportunities to integrate urban greening to respond to and connect the remnants of the woodland, along with protecting and enhancing important views and vistas.
- C. Development proposals incorporating new or re-purposed workspace should seek to ensure that this provision is designed to accommodate micro, small and medium-sized businesses, to complement and support existing clusters of cultural and creative industries, including in Brockley and Forest Hill.
- D. The comprehensive redevelopment of sites within Willow Way LSIS will be supported to enhance local employment provision as well as to improve the environmental and visual quality of the neighbourhood area. Development proposals within the LSIS should positively address the site's relationship with Upper Sydenham local centre,

particularly to ensure compatible land-uses as well as safe and legible connections. Development should deliver high quality designs that help to establish a more cohesive, employment-led mixed-use quarter.

- E. The sensitive intensification of established residential neighbourhoods will be supported where new development positively responds to their distinctive local character, including the landscape setting. The council will prepare a [Small Site Guidance Supplementary Planning Document](#), which development proposals should have regard to.
- F. Development proposals should help to ensure the West Area benefits from a high quality network of connections and routes that better link neighbourhoods and places, including green spaces, having regard to [Policy LWA4 \(West Lewisham Links\)](#). Particular consideration should be given to improving linkages between and access to strategic regional parks and open spaces that are located outside, but within comfortable walking or cycling distance from the West area.
- G. Development proposals must positively respond to the historic character and setting of the Horniman Museum and Gardens, particularly to support its role as a key visitor destination within London and the southeast. Proposals within the vicinity of the museum should provide for improved way finding and access routes to and from the museum.
- H. Development proposals should investigate opportunities for the comprehensive redevelopment of strategic site allocations and other sites, particularly within and around Sydenham and Forest Hill district centres, in order to make the most optimal use of land and support the delivery of the spatial strategy.
- I. Development proposals should contribute to delivery of high quality public realm, particularly on and around approaches to and from train stations, and along key movement routes including Ladywell Road, the South Circular, Sydenham Road, Dartmouth Road, and Brockley Road/Brockley Rise.
- J. The council has prepared evidence base documents and planning guidance to assist with understanding of the distinctive characteristics of the neighbourhoods and places within the West Area, and to help ensure coordination in the delivery of new investment. Development proposals should have regard to and positively engage with these documents, including:
  - a. Lewisham Characterisation Study (2019);;
  - b. Bell Green and Lower Sydenham Area Framework and/or SPD (forthcoming); and
  - c. Small Site Guidance SPD (forthcoming).

## LWA2 Connected network of town centres

- A. The West Area contains an historic network of town and local centres that serve its neighbourhoods. Development proposals should positively respond to this network and help to secure the long-term vitality and viability of the centres by:
- a. Preserving and enhancing their distinctive and historic character, including townscape, building and shopfront features;
  - b. Making provision for a wide range of appropriate main town centre uses that build on the economic strengths and unique attributes of each of the centres, whilst seeking to ensure they complement and do not compete with one another; and
  - c. Improving connections between the centres by:
    - i. Delivering public realm enhancements to facilitate safe and convenient pedestrian and cycle movements along main roads and routes linking the centres; and
    - ii. Making provision for highly accessible, safe and attractive interchanges at key public transport nodes, including stations.
- B. Brockley Cross, Crofton Park, Honor Oak / Brockley Rise and Upper Sydenham will be designated as local centres reflecting the complementary role each plays in the provision of local services and community facilities within their neighbourhoods.
- C. Within the West Area's town and local centres, proposals for meanwhile uses on vacant sites and properties will be supported in order to facilitate their return to active use, in line with [Policy EC22 \(Meanwhile uses\)](#). Meanwhile spaces catered for micro businesses, including independent traders, and community uses will be strongly encouraged.
- D. Development proposals should support the growth and evolution of Forest Hill district centre and its surrounds as a key hub of creative, cultural and community activity, in line with [Policy LWA2 \(Forest hill district centre and surrounds\)](#).
- E. The renewal of Sydenham district town centre to will be supported in order to secure its long-term vitality and viability. Development proposals will be expected to contribute to the renewal and revitalisation of the town centre by:
- a. Seeking opportunities to repair the structure and fabric of the centre through the sensitive redevelopment and infilling of sites, particularly those which detract from the historic character and grain that is still evident;
  - b. Delivering public realm improvements to make the centre a more accessible, welcoming and attractive place to visit, particularly at key arrival points around Sydenham station and at the western and eastern edges of the centre, along Kirkdale and Sydenham Road; and
  - c. Making provision for a diverse mix of main town centre uses (including shops, services and community facilities) that reinforce the role of the centre in Lewisham's town centre hierarchy, and ensure it both supports and complements significant new development planned on strategic sites in the Bell Green and Lower Sydenham area.

- F. The renewal of Upper Sydenham local centre will be supported in order to secure its long-term vitality and viability. Development proposals should contribute to a coordinated process of area improvement, helping to deliver a more cohesive and complementary relationship between the centre and neighbouring properties and sites, including the Willow Way Locally Significant Industrial Site and former Sydenham police station.
- G. The continued renewal of Brockley Cross local centre will be supported in order to secure its long-term vitality and viability. Development proposals will be expected to contribute to the renewal and revitalisation of the local centre by:
  - a. Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and positively responding to its historic character; and
  - b. Seeking opportunities to support and make provision of workspace for the cultural and creative industries, reinforcing and enhancing the existing cluster of activities to complement and strengthen relationships with the Forest Hill Cultural Quarter and Lewisham Creative Enterprise Zone.
- H. Development proposals should help to secure the long-term vitality and viability of Crofton Park local centre by:
  - a. Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and positively responding to its historic character;
  - b. Seeking to alleviate vehicle congestion by improve the pedestrian and cycle environment.
- I. Development proposals should help to secure the long-term vitality and viability of Crofton Park local centre by:
  - a. Reinforcing its distinctive character, particularly by maintaining a diverse mix of uses and positively responding to its historic character;
  - b. Seeking to improve the arrival point to Honor Oak around the station, particularly though public realm enhancements.

### **LWA3 Forest Hill district centre and surrounds**

- A. Development proposals should contribute to securing the long-term vitality and viability of Forest Hill district town centre by enhancing the place qualities of the centre and its surrounds, as well as reinforcing its role as a key focal point for commercial, cultural and community activity. Development proposals must contribute to a coordinated process of town centre improvement that positively responds to the area's distinctive character. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre's predominant commercial, cultural and community role is maintained and enhanced.
- B. The growth and evolution of Forest Hill district centre and its surrounds as a key hub of creative, cultural and community activity will be supported and reinforced by:
  - a. Ensuring development proposals provide a complementary mix of uses within the town centre, in line with other Local Plan policies;

- b. Designating the Forest Hill Cultural Quarter along with promoting and seeking to protect cultural and creative uses and activities within it, in line with Policy EC18 (Culture and the night-time economy);
  - c. Designating the town centre as an area of local significance of night-time economic activity, and strengthening its role as a visitor destination, in line with Policy EC18 (Culture and the night time economy);
  - d. Promoting Havelock Walk as an important asset with the Cultural Quarter and ensuring development proposals within this location:
    - i. Positively respond to its distinctive character and employment function;
    - ii. Do not result in a net loss of workspace (including workspace associated with authorised live-work development); and
    - iii. Clearly demonstrate that proposals for live-work development will secure dedicated provision of workspace that is appropriate to the location;
  - e. Extending the boundary of the Malham Road Locally Significant Industrial Site to include 118 Stansted Road, along with protecting and enhancing uses that within the LSIS that make a positive contribution to the Cultural Quarter; and
  - f. Promoting and protecting the Horniman Museum and Gardens as a significant cultural asset, including by improving wayfinding and safe access to it.
- C. Development proposals must contribute to enhancing the public realm in order to make the town centre a significantly more accessible, safer and attractive environment for pedestrians and cyclists. Particular consideration will need to be given to movements along and across the main junction and station approaches, the South Circular (A205), Dartmouth Road (A2216), Clyde Vale, Perry Vale and Waldram Park Road.
- D. Development proposals will be supported where they contribute to enhancing east-west pedestrian and cycle routes and connections within and around the town centre, including public realm enhancements along the station approaches and to the forecourt. Proposals designed to improve the quality of the station underpass (including its visibility, legibility and safe use) will be strongly supported.
- E. Development proposals should positively respond to the evolving urban scale and character of the town centre and its immediate surrounds. Development should be designed to provide for an appropriate transition in scale, bulk, mass and height between the centre, its edges and surrounding residential neighbourhoods, taking into account the area's distinctive landscape and topography features.

#### LWA4 West Lewisham Links

- A. Development proposals will be expected facilitate the creation and enhancement of the West Lewisham Links, a connected network of high quality walking and cycle routes linking key routes, public open spaces and other key destinations across the West area. The main strategic routes within this network are set out in **Table X**

below.

#### West Lewisham Links

Link route	Description	Key linkages
1		
2		
3		
4		

- B. On sites located adjacent to an existing or proposed route of the West Lewisham Links, or where an existing or proposed route runs through a site, development proposals must contribute to the delivery of a high quality public realm, giving priority to movement by walking and cycling, in line with [Policy QD3 \(Public realm\)](#) and [TR3 \(Healthy streets and part of healthy neighbourhoods\)](#). Proposals will be expected to deliver public realm improvements to support the delivery of the West Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include contributions towards:
- New or enhanced footpaths or cycleways;
  - Road realignment;
  - Street crossings or other safety measures;
  - Cycle parking;
  - External lighting;
  - Landscaping;
  - Tree planting or other green infrastructure;
  - Drinking water fountains;
  - Public conveniences;
  - Way-finding signage
- C. To support the effective implementation of the West Lewisham Links, development proposals will be expected to have regard to the council's Open Space Strategy.

### Site allocations

The site allocations for the West Area will be included here. Please refer attached sites document in the interim.

DRAFT

# Part Four

Delivery, funding and monitoring

# 19 Delivery and monitoring

## DM1 Working with stakeholders to deliver the Local Plan

- A. The Council will take a proactive and positive approach to working alongside local communities and community groups, key stakeholders, landowners, development industry partners and the wider public to realise the Vision for Lewisham, and to deliver the strategic objective for 'An Open Lewisham as part of an Open London'.
- B. Progress towards the delivery of the Vision for Lewisham and the Local Plan objectives, along with performance in implementation of the planning policies, will be regularly assessed, in line with **Policy DM5 (Monitoring and review)**. Where necessary, revisions to strategic policy approaches will be considered in order to ensure successful implementation of the spatial strategy for the Borough, along with beneficial social, economic and environmental outcomes.

### Explanation

- 19.1. The Lewisham Local Plan sets out an ambitious long-term strategy for securing and coordinating new investment in the Borough, along with managing growth and new development in a socially, economically and environmentally sustainable way. It seeks to provide clarity around the main issues and opportunities facing the Borough and certainty about how these will be addressed for the wider public benefit. The Local Plan sets out a Vision for Lewisham and, to support the delivery of this vision, provides details about the character sub-areas within the Borough and how development within their neighbourhoods can contribute to delivering inclusive, healthy and liveable places.
- 19.2. The Local Plan is underpinned by a focus on delivery and implementation. It has been informed by a detailed assessment of the infrastructure required to support Lewisham's neighbourhoods now and in the future, taking into account the levels of growth planned over the long-term. The Local Plan is a shared document intended to be used by internal and external stakeholders alike, and has therefore been prepared through extensive public consultation. It should help to ensure that infrastructure providers and public sector agencies are sighted on the scale of growth to be delivered locally, so that they can appropriately plan for and allocate funding towards service and capacity upgrades.
- 19.3. We have prepared an Infrastructure Delivery Plan (IDP) as a companion document to the Local Plan, and which will support its successful implementation. This sets out details on the infrastructure required to support growth and new development across the Borough. The IDP will be subject to regular review and updating over the plan period, for example to take account of infrastructure that has been delivered and/or new infrastructure programmes and service priorities that come to light.
- 19.4. We will work positively and proactively with local communities and community groups, businesses, key stakeholders, landowners, developers and the wider public to ensure the successful delivery of the Local Plan. Effective cross-service working, securing the coordinated and timely delivery of social and physical

infrastructure improvements, including green infrastructure, will be essential to support new development and ensure that growth in Lewisham is delivered as Good Growth.

## DM2 Infrastructure funding and planning obligations

### Community infrastructure levy

- A. The council will set a Lewisham Community Infrastructure Levy which is payable on all qualifying development. CIL funding will be used to secure the delivery of inclusive, healthy and liveable neighbourhoods across the Borough that are well supported by infrastructure. A CIL Charging Schedule will be published and this will be subject to periodic review over the plan period.
- B. A portion of Lewisham CIL collected will be allocated towards neighbourhood priorities to help ensure that local areas are appropriately supported with infrastructure and benefit from investment generated by new development. The council will work proactively with local communities to set priorities for the spending of neighbourhood CIL in Lewisham.
- C. Neighbourhood forums are strongly encouraged to identify priorities for the use of neighbourhood CIL in neighbourhood plans.

### Planning obligations

- D. The council will seek planning obligations on a case-by-case basis having regard to the relevant policy requirements of the statutory Development Plan, development specific impacts, appropriate mitigation (including additional facilities or requirements made necessary by the development), viability and the statutory tests for the use of planning obligations.
- E. The following is a list of areas where planning obligations may be sought, recognising that other types of obligations may be necessary depending on the nature of a proposal and individual site circumstances:
  - Affordable housing
  - Transport and highways infrastructure and works
  - Public transport improvements
  - Parking controls and restrictions
  - Community and social infrastructure
  - Employment and skills training
  - Affordable workspace
  - Public realm
  - Public art
  - Community safety measures
  - Amenity space
  - Play space and recreational facilities
  - Open space

- Green infrastructure
- Biodiversity and wildlife habitats
- Communications infrastructure
- Management and maintenance arrangements
- Low carbon and renewable energy
- Flood risk management
- Utilities

### **Explanation**

19.5. A wide range of strategic infrastructure projects will be required to support the levels of planned growth within Lewisham over the long-term. As well, specific measures may be needed on a site-by-site basis to ensure that additional needs for infrastructure generated by new development are positively managed and that any impacts arising are appropriately mitigated. The following section describes the main funding tools that are available to the council to support the successful delivery of the Local Plan.

#### **Community Infrastructure Levy**

- 19.6. Both the Mayor of London and the council have legal powers to introduce a Community Infrastructure Levy. This is a charge levied on certain types of new development and is non-negotiable. It is an important tool to help fund the delivery of strategic infrastructure that is essential to support growth across London, particularly transport infrastructure. CIL is also vital to helping the council secure infrastructure required for inclusive, healthy and liveable neighbourhoods across the Borough.
- 19.7. Most new development which creates net additional floor space of 100 square metres or more, or creates a new dwelling, is potentially liable for the levy. Some developments may be eligible for relief or exemption from the levy. This includes social housing, residential annexes and extensions, and houses and flats which are built by 'self-builders'. There are strict criteria that must be met, and procedures that must be followed, to obtain the relief or exemption. Applicants are advised to refer to the Government's Planning Practice Guidance for general information on the setting, collection and use of the levy.
- 19.8. The London Mayor has introduced a CIL that is applicable to qualifying development across London. The council assists in administering the collection of CIL funding generated in Lewisham on behalf of the Mayor. We will seek to advise applicants on the latest information on the Mayoral CIL.
- 19.9. In addition, the council adopted a CIL Charging Schedule in February 2015 which sets out the local levy rates within the Borough. This will be subject to periodic review and potential updating over the plan period. Changes to the CIL Charging Schedule may be necessary to respond to significant changes in the level of infrastructure provision required to support the planned levels of growth, or to take into account new evidence on development viability. Further information is available on the council's planning website.
- 19.10. A portion of the local CIL collected in Lewisham is set aside to be spent on neighbourhood priorities. The council has formally agreed governance

arrangements for the use of this neighbourhood Community Infrastructure Levy (NCIL). There are NCIL funds available to each ward within the Borough. Local residents and community groups are encouraged to assist in setting priorities for the use of these funds within the local area. Neighbourhood forums are strongly encouraged to set out priorities for the use of NCIL within neighbourhood plans. This will allow for an additional level of public engagement in the process of priority setting and help to ensure there are clear priorities in place to address neighbourhood plan objectives. Further information on the governance arrangements for NCIL, and opportunities to assist in priority setting, is available on the council's planning webpage.

#### Planning obligations

- 19.11. As part of the process of determining planning applications, the council may seek to enter into legal agreements with landowners and developers, and/or secure planning contributions. This is particularly where infrastructure is required to address the additional demand generated by new development proposals. The purpose of planning obligations is to make development acceptable in planning terms. Planning obligations will be sought to compensate and/or mitigate the impact of a development, which without that mitigation, would render the development unacceptable in planning terms. Legal agreements and/or contributions will be negotiated on a case-by-case basis, taking into account the individual site circumstances and the mitigation measures required for the development proposed. Planning applications will be refused where appropriate mitigation measures are not provided or cannot otherwise be secured.
- 19.12. We have published a Planning Obligations Supplementary Planning Document. This sets out guidance on the types and scale of planning obligations that are likely to be sought in accordance with Lewisham's statutory Development Plan. The SPD sets out our expectations on the process for securing planning obligations. Reduced contributions, where necessary (for example due to the exceptional costs of redeveloping a particular site) will be negotiated on an 'open book' basis based on the financial viability of the scheme.

### DM3 Masterplans and comprehensive development

- A. Development proposals must be accompanied by a site masterplan where they form all or part of a site allocation, or in other circumstances specified by the Local Plan. The site masterplan will be expected to set out how development will contribute to delivery of the spatial strategy for the Borough. It must also suitably demonstrate that the proposal will not prejudice the future development of other parts of the site and adjoining land, or otherwise compromise the delivery of the site allocation and outcomes sought for the wider area.
- B. The site masterplan must be submitted at the outline or full planning application stage. Where an outline application is submitted, it should be accompanied by a full planning application for the first phase of the development. The masterplan will be required to comprise of:

- a. An assessment of the site and its context to inform the overall development strategy;
  - b. A detailed site-wide masterplan that positively responds to the spatial strategy for the Borough, site specific development principles and guidelines, and other relevant planning policies; and
  - c. A delivery strategy that identifies how the development will be implemented and managed over its lifetime. This strategy must address any relevant matters to be resolved such as land assembly and preparation, infrastructure requirements, development phasing and likely need for planning obligations and/or planning conditions, where appropriate.
- C. Proposals must address how the development site relates to neighbouring properties and the surrounding area, particularly in contributing to the delivery of the spatial strategy for the Borough. Where appropriate, applications will be required to be supported by a masterplan covering multiple sites in order to demonstrate the acceptability of the scheme both in terms of its immediate and wider context. This is additional to the site masterplan required by (A) and (B) above.
- D. Applicants must demonstrate that they have appropriately consulted the public through the masterplan process, including active engagement with the landowners and occupiers of the subject site along with those in other parts of the allocated site.

### **Explanation**

- 19.13. In order to achieve the Local Plan's vision and strategic objectives it will be important that all development proposals positively engage with and seek to deliver the spatial strategy for the Borough. This is particularly vital for those sites that have been allocated for their strategic role and potential to deliver new and improved housing, business space, public realm, facilities and other infrastructure to support our communities. The site allocations are comparatively large brownfield sites and can therefore add complexity in terms of their redevelopment. This may include a situation of multiple land ownership, fragmentation of existing uses and space, land remediation and need for new or upgraded infrastructure. The council considers that these constraints are more likely to be overcome, and the optimal use of sites realised, where development is brought forward comprehensively and in line with a site-wide masterplan.
- 19.14. To help ensure certainty of outcomes, the council will seek that masterplans are submitted at the outline or full planning application stage. The masterplan should be informed by a baseline assessment of the site and its surrounds, drawing on the latest available evidence. This may include demographic data, economic and social indicators and/or information on the historical, natural and built environment. The site-wide masterplan itself should establish the overall approach to the function and form of development. The level of detail included in the masterplan should be commensurate with nature and scale of development proposed, along with site specific requirements. Depending on individual circumstances, matters to be addressed may include: historical and cultural context; land uses, quantum and distribution of development; layout and design; access, circulation and parking; open space and landscaping; and infrastructure (including transport, community and green infrastructure).

19.15. The delivery strategy is important to ensuring certainty on outcomes sought both for the individual scheme and the site allocation. One of the key aims of the masterplan process is to ensure that landowners and/or developers are liaising with each other and made aware of the planning objectives for the site and wider area. Coordination between landowners and other stakeholders, including infrastructure providers, will help to ensure that proposals do not prejudice each other, or the wider development aspirations for the Borough. Sites that are designed and brought forward comprehensively through the master plan process will help to alleviate issues that may arise through piecemeal development, are more likely to maximise wider public benefits.

## DM4 Land assembly

- A. To help realise the shared Vision for Lewisham and to achieve the strategic objective of “An Open Lewisham as Part of an Open London”, the council will support land assembly to achieve comprehensive development, and will use compulsory purchase powers, only where necessary, to assemble land for development within the Borough where:
- a. Landowners and/or developers, as appropriate, can demonstrate that:
    - i. There is a viable and deliverable development proposal that appropriately satisfies the Local Plan requirements; and
    - ii. They have made all reasonable efforts to acquire, or secure an option over, the land and/or building(s) needed, through negotiation.
  - b. Comprehensive redevelopment of the assembled site is necessary to deliver a strategic site allocation contained in the Local Plan (including the requirements of a masterplan where required); and
  - c. The development proposal for the assembled site will contribute to the delivery of the spatial strategy for the Borough, having particular regard to the Vision and place principle policies for the area within which the development is located.
- B. Where compulsory purchase is necessary, and determined to be an appropriate option for securing development that supports the delivery of the spatial strategy, applicants will be required to demonstrate how the associated costs will impact upon development viability.

### Explanation

19.16. A comprehensive approach to development of sites will often be in the public interest, particularly to secure the successful delivery of the spatial strategy for the Borough. On larger sites, including site allocations, the piecemeal development or incremental building out of schemes might be more easily delivered in certain circumstances. However the constraints posed by site boundaries, neighbouring developments or land uses, along with infrastructure and utilities (whether at or below the surface), all have potentially limiting consequences for the design, scale, land use mix and viability of schemes. Across Lewisham and particularly in key strategic locations - such as Opportunity Areas, Areas for Regeneration and town centres - such consequences could depress the optimal use of land or impose limitations on coordinated planning and development of a site or an area.

A comprehensive approach to development is advocated in order to ensure the achievement of wider regeneration and strategic growth objectives.

- 19.17. The necessity to use compulsory purchase powers is more likely on complicated strategic sites, particularly where there are multiple landowners and leaseholders. The council will always assess the most appropriate options for securing the successful delivery of the Local Plan. It will carefully consider the use of powers available to it in order to ensure new development is brought forward in a coordinated way, and delivered in the wider public interest.

## DM5 Monitoring and review

- A. The implementation of the Lewisham Local Plan will be kept under review throughout the plan period, taking into account the Local Performance Indicators set out in **Table X** (Monitoring framework). Progress and performance outcomes towards the delivery of the Vision for Lewisham and the spatial strategy will be published annually in the statutory Authority Monitoring Report (AMR).
- B. Development viability in the Lewisham will be regularly reviewed over the plan period. Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, whether in particular areas or across the Borough, the council will consider the need for a review of strategic approaches or policies.

### Explanation

- 19.18. Monitoring is necessary to assess progress towards the implementation of the Local Plan over the plan period. The section sets out the monitoring framework against which the successful delivery of the Local Plan will be measured. The monitors will help to assess yearly performance. However, it is recognised that that spatial strategy is underpinned by the need for sensitively managed change and transformational investment (for example, in public transport infrastructure), which in some local areas or specific circumstances may take several years to begin to materialise.
- 19.19. Performance against Lewisham's Local Performance Indicators (LPIs) will be published in the statutory Authority Monitoring Report (AMR). Performance metrics and figures will be accompanied by commentary to make reports more legible and user-friendly, and may be supported by additional monitoring information. The LPIs will help to supplement, and should be read alongside, the Key Performance Indicators (KPIs) used for monitoring of the London Plan.
- 19.20. The LPIs are considered to be the key indicators for assessing policy performance and overall implementation of the Local Plan. The AMR will include a more comprehensive and detailed set of data, which will help to complement and put into context the LPIs. This may include data that is not made available on an annual basis, such as the Indices of Multiple Deprivation and Census data, information within research reports and other technical evidence, and council strategies. The AMR is therefore expected to evolve over time, however continuity will be ensured through a focus on the LPIs.

19.21. Where monitoring clearly indicates that a strategic objective, elements of the Local Plan spatial strategy or specific plan targets are not being delivered, we will assess the reasons for this and may consider, as appropriate, contingency measures or other actions. This may include single issue reviews and corresponding updates to the Local Plan.

19.22. We will regularly monitor development viability as part of the Local Plan monitoring. Where evidence suggests that changes in land values are likely to significantly impact on the viability of different types of development, whether in particular areas or across the Borough, the council will consider the need for a review of strategic approaches or policies. This is particularly in respect of requirements for affordable housing. For example, where land values increase as a result of investment in strategic infrastructure (such as the Bakerloo line upgrade and extension), we will seek to ensure that the maximum viable amount of genuinely affordable housing is secured on a site by site basis.

Ref	Measure	Indicator
<b>High quality design and heritage</b>		
LPI 1	Historic environment	Adoption of Area Appraisals and Management Plans for all conservation areas
<b>Housing</b>		
LPI 2	Housing supply	Increase in supply in new homes over the plan period, measured by housing completions and net pipeline of approved housing units
LPI 3	Housing delivery	Increase in supply in new homes, measured against housing completions towards the borough's strategic housing target to-date
LPI 4	Small housing sites	Housing completions on small sites, measured against <b>draft</b> London Plan small sites target of 379 units annually, and as a proportion of overall housing completions
LPI 5	Affordable housing	Positive trend in percentage of housing completions that are for affordable housing, on schemes of 10 units or more, measured against the borough's strategic affordable housing target of 50 percent
LPI 6	Genuinely affordable housing delivery	Positive trend in percentage of housing completions that are for genuinely affordable housing
LPI 7	Affordable housing planning contributions	Planning contributions secured towards affordable housing on schemes of less than 10 units, measured annually
<b>Economy and culture</b>		
LPI 8	Industrial land availability	No overall loss of industrial floorspace in Strategic Industrial Locations and Locally Significant Industrial Sites
LPI 9	Mixed-use employment locations	Industrial floorspace re-provided through comprehensive redevelopment of MEL sites, measured as the proportion of industrial floorspace of the overall floorspace delivered
LPI 10	Non-designated employment sites	Industrial floorspace re-provided through the redevelopment of non-designated sites, measured as

		the proportion of industrial and other employment generating floorspace of the overall floorspace delivered
LPI 11	New workspace	Positive trend in supply of towards a target of 21,800 sqm B1 floorspace by 2040
LPI 12	Affordable workspace	Positive trend in affordable B1 workspace as a share of total B1 floorspace in planning approvals, along with planning contributions secured towards affordable workspace
LPI 13	Retail floorspace	Increase in supply of retail floorspace, measured against the target of 5,300 net additional sqm over the ten year period 2020-2030 (comprising -500 sqm comparison and +5,800 sqm convenience goods)
LPI 14	Town centre vitality and viability	Reduction and stabilisation of town centre vacancy rates in major and district town centres, towards a target of 5% vacancy rates for each centre
LPI 15	Cultural infrastructure	No net loss of cultural venues and facilities
LPI 16	Public houses	No net loss of public houses
Community infrastructure		
LPI 17	Community infrastructure	No net loss of community infrastructure
Green infrastructure		
LPI 18	Open space	No net loss of designated open space
Sustainable design and infrastructure		
LPI 19	Carbon neutral Lewisham	Reduction in borough-wide carbon emissions towards a local target of zero carbon by 2030, contributing toward the London Mayor' strategic target for London to become a zero carbon by 2050
LPI 20	Carbon emissions on new development	Average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved major development applications.
LPI 21	Air quality	Positive trend in approved major development applications demonstrating that they meet at least air quality neutral standard for emissions
Transport and connectivity		
LPI 22	Modal share	Increasing mode share for walking, cycling and public transport (excluding taxis) towards the London Mayor's target of 80% by 2041.
Neighbourhoods and places		
LPI 23	Allocated sites committed	Number and proportion of total allocated sites committed by way of planning consent towards target of 100% by 2040
LPI 24	Allocated sites delivered	Number and proportion of total allocated sites delivered by way of completion, towards target of 100% by 2040
LPI 25	Housing supply by character area	Increase in supply in new homes in the character area over the plan period, measured by housing completions and net pipeline of approved housing units
LPI 26	Housing delivery by character area	Increase in supply in new homes in the character area, measured against housing completions to-date
LPI 27	Workspace delivery by character area	Positive trend in amount of workspace completed in the character area

LPI 28	Retail floorspace delivery by character area	Net change in Class A1 retail floorspace by character area
LPI 29	Lewisham links	Delivery of Lewisham links routes by character area
LPI 30	Open Lewisham	Positive reduction in multiple deprivation over the plan period, measured against the baseline 2019 Indices of Multiple Deprivation

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# Part Five

Schedules and appendices

Scheduled and appendices to be included

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