

Integrated Impact Assessment (IIA) of the Lewisham Local Plan

Interim IIA Report
Non-technical Summary

March 2020

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Introduction

AECOM is commissioned to undertake Integrated Impact Assessment (IIA) in support of the emerging Lewisham Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth and establish the policies against which planning applications will be determined.

IIA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IIA involves undertaking the legally required Sustainability (SA) process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to the health impacts promote the reduction of health inequality.

Central to the IIA process is preparation of an IIA Report for publication alongside the Draft Plan. At the current time, an early draft version of the plan is published for consultation, with an 'Interim' SA Report published alongside. This report is the Non-technical Summary (NTS) of the Interim IIA Report.

Structure of the Interim IIA Report / this NTS

IIA reporting essentially involves answering the following questions in turn:

1) What has plan-making / IIA involved **up to this point**?

- including in relation to 'reasonable alternatives'.

2) What are the IIA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question: *What's the scope of the IIA?*

What's the scope of the IIA?

The scope of the IIA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of IIA, providing a methodological 'framework' for assessment.

The IIA framework is presented within the table below. This framework is an update on that previously published for consultation in 2015, and comments are invited on this framework at the current time.

Table A: The IIA framework

| Topic | Objective |
|---------------------------------------|--|
| Air quality and pollution | Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution. |
| Biodiversity and green infrastructure | Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid. |
| Climate change adaptation | Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change. |
| Climate change mitigation | Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks) |

| Topic | | Objective |
|---|---------------|--|
| Communities | Accessibility | Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues. |
| | Housing | Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments. |
| | Wider issues | Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime. |
| Economy | | Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries. |
| Historic environment, heritage, character and culture | | Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity. |
| Land and natural resources | | Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land. |
| Transport | | Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades. |

Plan-making / SA up to this point

An important element of the required IIA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or **growth scenarios**.

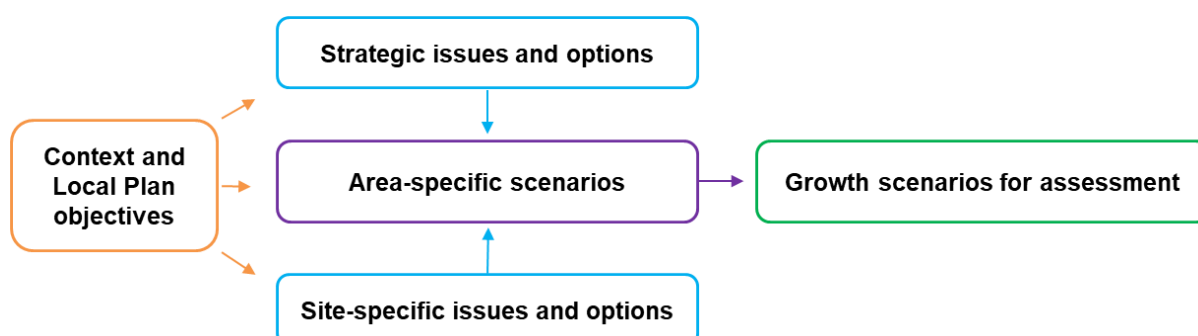
Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** the growth scenarios
- 2) Presents the outcomes of **appraising** the growth scenarios
- 3) Explains reasons for **establishing** the preferred option, in light of the assessment

Establishing growth scenarios

Growth scenarios were established following a step-wise process, which is summarised in Figure A.

Figure A: Establishing growth scenarios



The first step was to consider strategic issues/options ('top down' factors) in respect of:

- Housing quantum – there is a need to provide for the London Plan target and also plan mindful of the Local Housing Need (LHN) figure, which is significantly higher.
- Broad distribution – specifically issues/options relating to: opportunity areas; regeneration areas; town and district centres; transport corridors; delivering strategic infrastructure; density / building heights; changing employment needs; respecting / enhancing local character and the local environment; and climate change.

The second step was then to give 'bottom-up' consideration to: A) site options available and hence in contention for allocation; B) the approach to assigning an indicative use mix to each allocation; and C) the approach to assigning an indicative density to each allocation. The conclusion was that (C) stands-out as associated with a strategic choice to explore further as a 'variable' across the growth scenarios.

The penultimate step involved exploring area-specific scenarios – see Table B. Combining these area-specific scenarios led to six borough-wide growth scenarios for assessment – see Table C and subsequent maps.

Table B: Area-specific scenarios

| Sub-area | Area | Potential for growth over-and-above the baseline scenario ¹ |
|----------|------------------------------------|--|
| Central | Lewisham | Bakerloo Line Extension (BLE) Phase 1 would enhance the Public Transport Accessibility Level (PTAL) potentially leading to modest additional development opportunity (c.10%). |
| | A21 corridor | BLE Phase 2 would enhance PTAL potentially leading to modest additional development opportunity (c.10%). |
| | Catford | The baseline approach to density seeks to strike a balance between PTAL, regeneration objectives and constraints to tall buildings and is the emerging direction of travel from the Catford Town Centre Masterplan; however, there is potentially the option of delivering a tall buildings cluster and, in turn, a c.20% uplift in homes delivered. |
| North | New Cross area | BLE Phase 1 would enhance PTAL potentially leading to modest additional development opportunity (c.10%). |
| | Elsewhere | - |
| East | | - |
| South | Bell Green / Lower Sydenham (BGLS) | BLE Phase 2 would enhance PTAL and could lead to significant additional development opportunity, potentially leading to a c.200% uplift in development densities. It is also considered appropriate to explore a c.100% uplift. |
| | Elsewhere | - |
| West | | - |

¹ Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations (also support for small windfall sites). It does not describe a 'no plan' scenario.

Table C: Growth scenarios

| Scenario | BLE | Location for growth over-and-above the baseline ¹ |
|----------|-----|--|
| 1 | - | N/a |
| 2 | | Catford (20%) |
| 3 | P1 | New Cross (10%); Lewisham (10%); |
| 4 | | New Cross (10%); Lewisham (10%); Catford (20%) |
| 5 | P2 | New Cross (10%); Lewisham (10%); A21 (10%); Catford (20%); BGLS (100%) |
| 6 | | New Cross (10%); Lewisham (10%); A21 (10%); Catford (20%); BGLS (200%) |

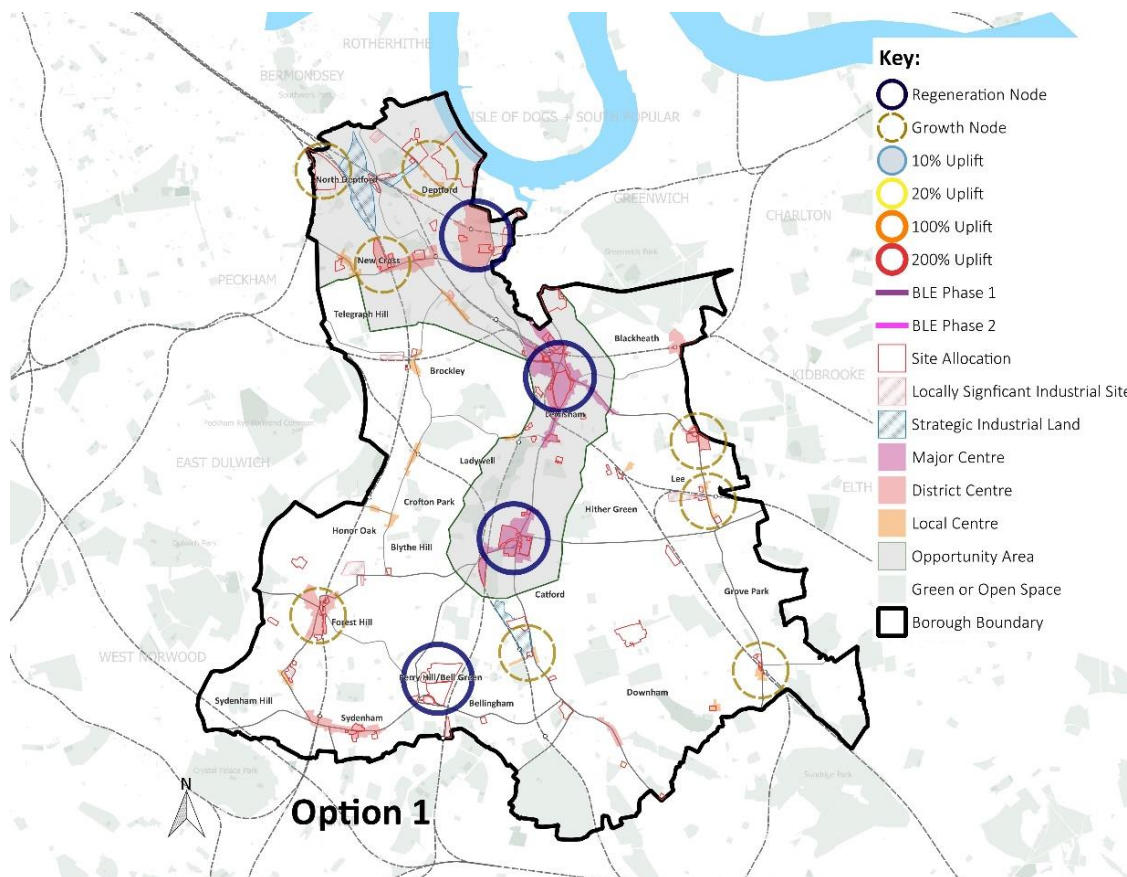
There are several key points to note:

- A key defining feature is the BLE assumption assigned to each of the scenarios. “No BLE” is the baseline assumption, but there is also a need to explore scenarios involving BLE Phase 1, which would extend to Lewisham, and BLE Phase 2, which would extend to Hayes via Lower Sydenham via potential stations at Ladywell and Catford. It is recognised that the three BLE scenarios mean that the six scenarios are not all directly comparable (i.e. the six scenarios might alternatively be presented as three sets of directly comparable scenarios).
- Scenario 1 is the baseline scenario, i.e. a scenario whereby a ‘baseline’ approach to assigning indicative densities to site allocations (also support for small windfall sites). The assumption, for the purposes of assessment, is that the uplift in homes under Scenarios 2 to 6 would be achieved by assigning higher indicative densities to certain of proposed allocations. However, in practice it is recognised that certainty regarding the BLE could lead to one or more new sites being made available and ultimately identified as suitable for allocation (for example, through the greater incentive for landowner(s) to assemble and deliver sites).
- Broad areas are identified to deliver an uplift in homes under Scenarios 2 to 6, rather than specific sites, recognising that work has not been completed to identify specific sites that might be suited to higher density. The exception to this rule is the BGLS area, where initial work has been undertaken and served to confirm that all six of the proposed allocations in this area would be suitable to delivering a significantly higher density under a BLE P2 scenario, with maximum site-specific uplifts ranging from c.200% to c.350%.
- With regards to total quantum of new homes the assumption is that Option 1 (the lowest growth option) would meet and modestly exceed the target established by the new London Plan (as currently understood),² whilst Option 6 (the highest growth option) would significantly ‘close the gap’ between housing supply and LHN, as understood from the Lewisham Strategic Housing Market Assessment (2019); however, it is not possible to assign housing quantum figures to each of the alternatives with any certainty.

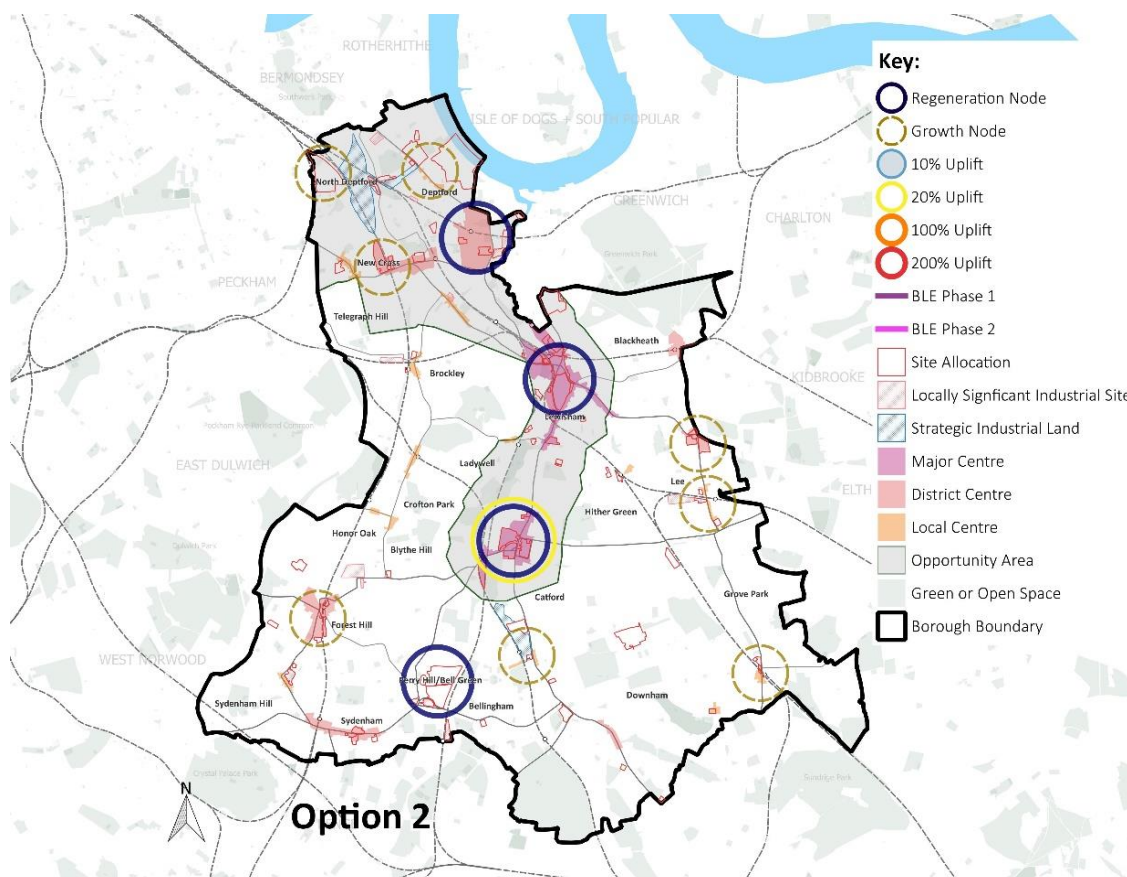
It is also worth reiterating that the growth scenarios vary in respect of the number of homes delivered through proposed allocations only. The growth scenarios do not vary in respect of delivery of homes through windfall sites, which is an important source of supply. The proposed Local Plan approach to supporting an increase in housing supply at windfall sites, including through sensitive suburban intensification, is held constant across the growth scenarios and hence not a focus of the assessment within Table D; however, it is discussed further within the subsequent section that presents an assessment of the Draft Local Plan as a whole.

² i.e. the housing targets set out in the “London Plan Examination in Public Panel Report – Panel Recommendations October 2019”. Having considered the Panel report and recommendations, the London Mayor issued an Intend to Publish version of the London Plan, which was sent to the Secretary of State alongside with responses to the Panel’s recommendations, and a decision is pending.

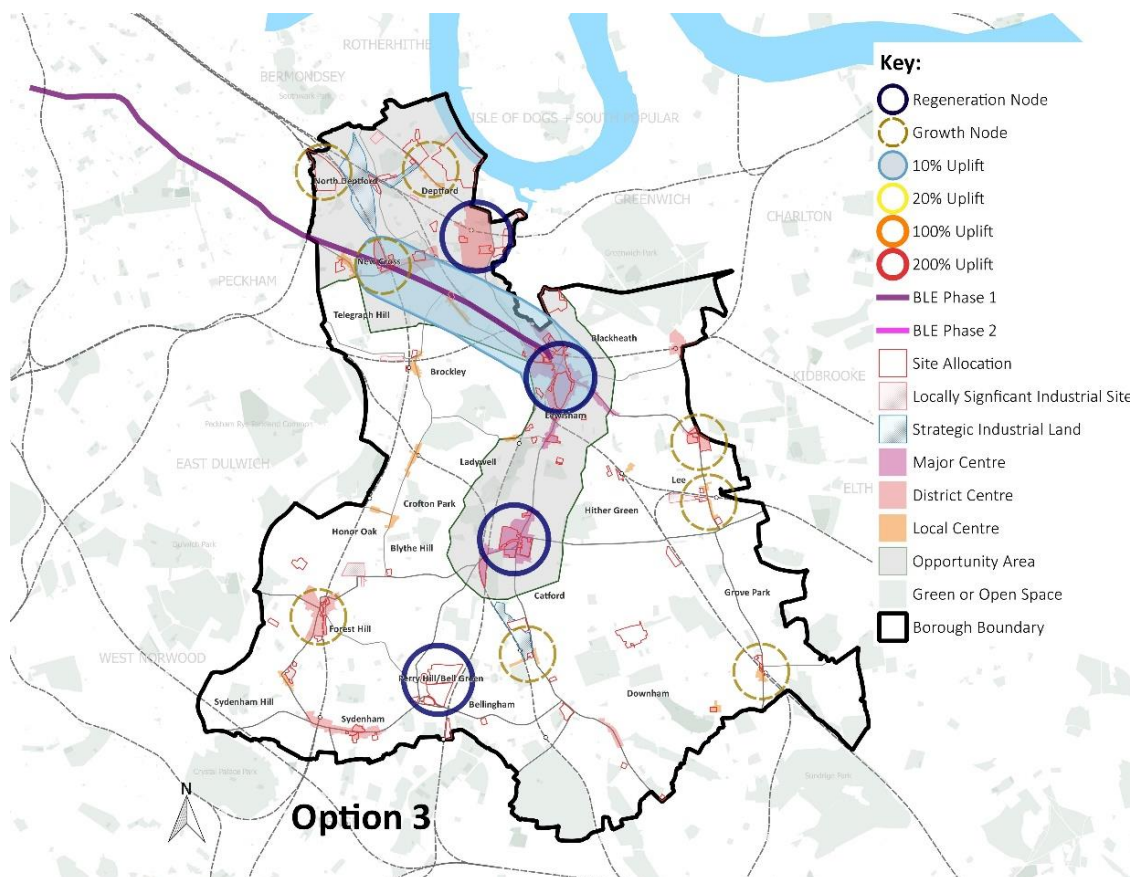
Scenario 1: No BLE; baseline approach to densities



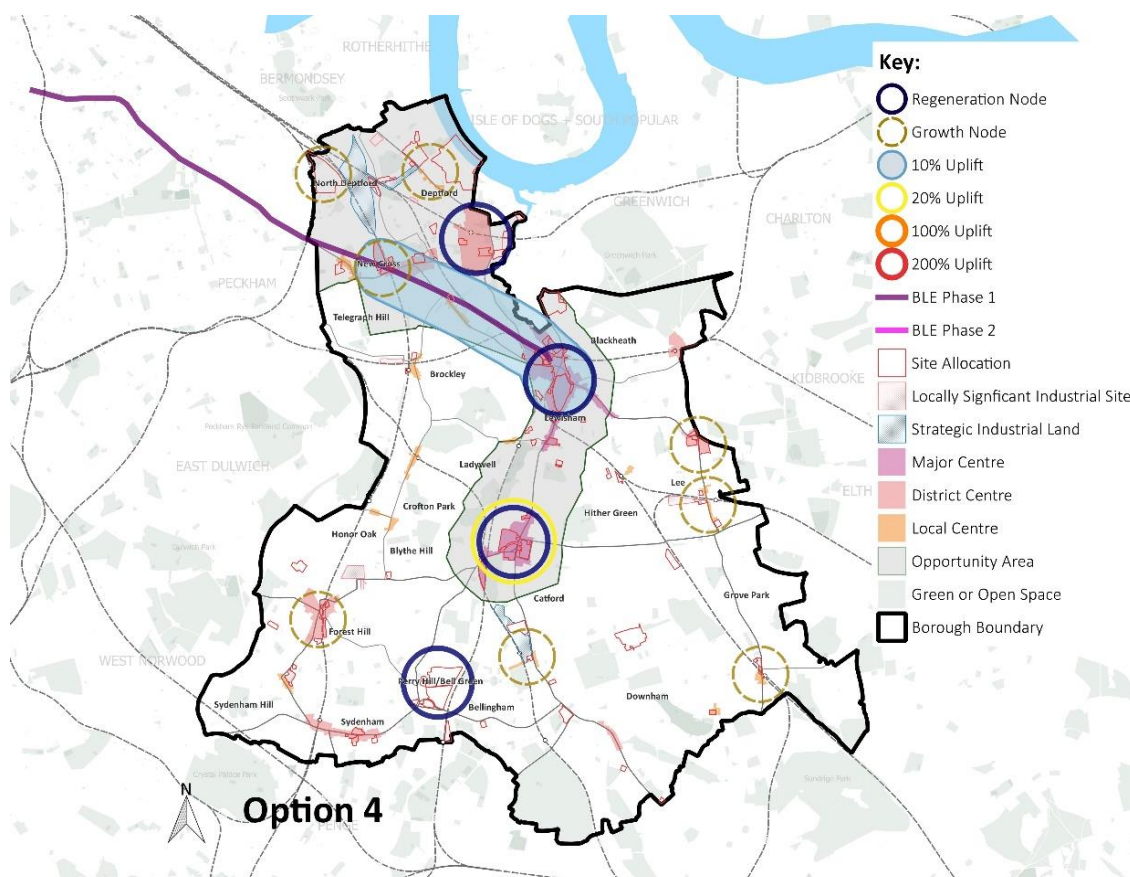
Scenario 2: No BLE; uplift at Catford (20%)



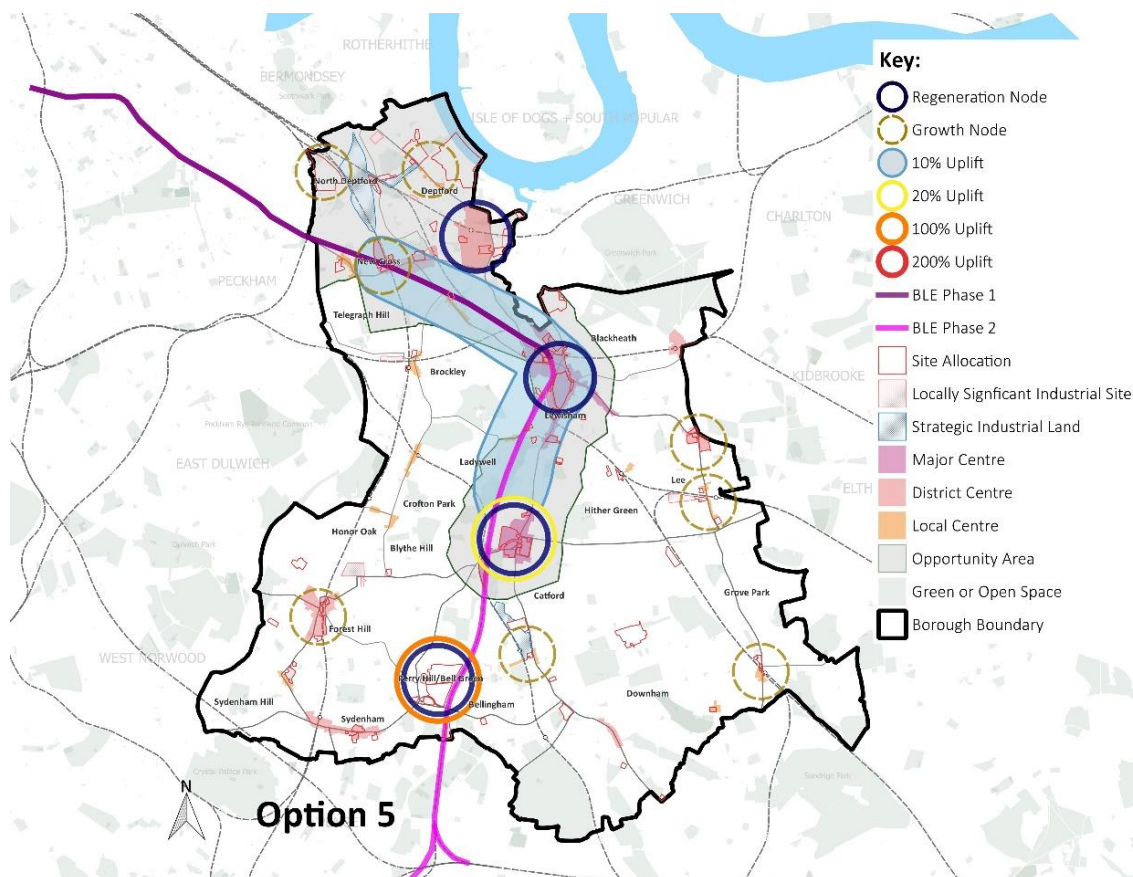
Scenario 3: BLE P1; uplift at New Cross and Lewisham (10%)



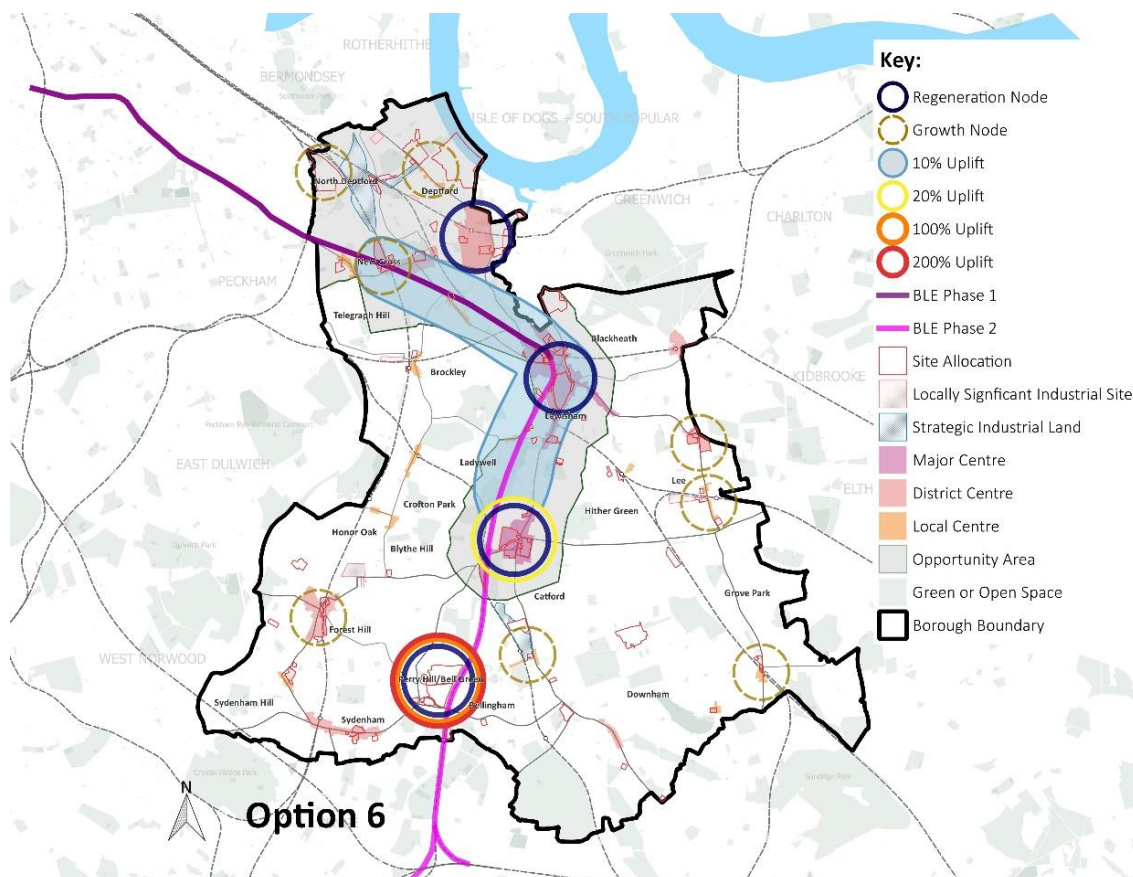
Scenario 4: BLE P1; uplift at New Cross and Lewisham (10%) and Catford (20%)



Scenario 5: BLE P2; uplift at New Cross and Lewisham (10%), Catford (20%) and BGLS (100%)



Scenario 6: BLE P2; uplift at New Cross and Lewisham (10%), Catford (20%) and BGLS (200%)



Assessing growth scenarios

Summary alternatives assessment findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the IIA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (no significant effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect) and also rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, '=' is used to denote where it not possible to differentiate the alternatives with any confidence.

Table D: Growth scenarios appraisal (rank and effect categorisation)

| Topic | | No BLE | | BLE Phase 1 | | BLE Phase 2 | |
|---|---------------|------------------|------------------------|----------------------------------|--|---|--|
| | | Scenario 1: - | Scenario 2: Catford | Scenario 3: N' Cross Lewisham | Scenario 4: N' Cross Lewisham Catford | Scenario 5: N' Cross Lewisham A21 Catford LSBG | Scenario 6: N' Cross Lewisham A21 Catford LSBG+ |
| Air quality and other pollution | | 3 | 4 | 3 | 4 | 2 | ★1 |
| Biodiversity and green infrastructure | | ★1 | 2 | 3 | 4 | 5 | 6 |
| Climate change adaptation | | ★1 | 2 | 3 | 4 | 5 | 6 |
| Climate change mitigation | | 3 | 3 | 3 | 3 | 2 | ★1 |
| Communities | Accessibility | 3 | 3 | 3 | 3 | 2 | ★1 |
| | Housing | 5 | 4 | 4 | 3 | 2 | ★1 |
| | Other issues | = | = | = | = | = | = |
| Economy | | ★1 | 2 | 2 | 3 | 4 | 5 |
| Historic environment, heritage, character and culture | | ★1 | 3 | 2 | 4 | 5 | 6 |
| Land and natural resources | | = | = | = | = | | |
| Transport | | 3 | 4 | 3 | 4 | 2 | ★1 |

Discussion

The appraisal matrix above shows a mixed picture, with Scenario 1 performing well in certain respects and higher growth scenarios that assume the BLE performing well in other respects. Scenario 2 which would involve an uplift in homes over-and-above Scenario 1 without the BLE is found to perform poorly in respect of all IIA topics other than 'Housing'. Having made these initial points, set out below is a discussion under the eleven topic headings that comprise the IIA framework:

Air quality and other pollution

There are currently six AQMAs in Lewisham, comprising a blanket AQMA covering the north of the Borough (north of the A205 South Circular) together with AQMAs along major roads in the south. Higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4) would see new housing at densities considerably above that which application of the London Plan Strategic Housing Land Availability Assessment (SHLAA) standard methodology would suggest is appropriate, which potentially gives rise to a concern in respect of generation of private car movements; however, growth would be delivered in the context of the Catford Town Centre Masterplan, which is exploring means of enhancing walking and cycling opportunities in the area and maximising the town centre offer (thereby minimising need to travel). Notably, realignment of the South Circular (A205) will address existing issues of severance and pollution, and another key opportunity is in respect of improving 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; a higher growth strategy could potentially assist with achieving these objectives. With regards to **BGLS**, there is cautious support for a higher growth scenario (Scenario 6) from an air quality perspective. PTAL would be high given BLE P2 and there could be potential to deliver a new town centre with a considerable offer, which could go some way towards addressing current poor accessibility locally, which is associated with high car dependency. Growth could also facilitate investment in walking / cycling infrastructure (with major interventions to improve permeability across the Bell Green Gyratory, including through redevelopment of the Stanton Square Locally Significant Industrial Site), the urban realm, river re-naturalisation / greenspace and links between greenspaces (notably the Pool River, Beckenham Place Park, Sundridge Park and Crystal Palace Park), helping to address existing issues that serve to dissuade people from walking and cycling and, in turn, supporting reduced car movements and improved air quality. With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, there are limited implications in respect of air quality, recognising that the uplift in densities would be in response to an increase in PTAL following the BLE. The A21 corridor, between Lewisham and Catford, is associated with a notable opportunity in respect of supporting walking / cycling, with the ambition being both to enhance the principal north-south route and develop a complementary network of legible, safe and accessible routes, including cycling Quietways, that link with it to enhance connections between neighbourhoods and destinations, including open spaces; however, it is difficult to conclude that a marginally higher growth strategy will have a significant bearing.

In **conclusion**, there is support for Scenarios 5 and 6, which would see BLE P2 alongside an uplift in development densities at Catford and BGLS, and there is a degree of concern associated with support for higher development densities at Catford in the absence of BLE P2 (Scenarios 2 and 4). There is insufficient evidence at this stage to enable a conclusion of significant negative effects, but this is tentative.

Biodiversity and green infrastructure

As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher densities at the same package of sites that would deliver Scenario 1, as opposed to through additional allocations, which potentially serves to reduce concerns in respect of higher growth scenarios conflicting with biodiversity and green infrastructure objectives. However, certain concerns still remain, recognising that higher density development can mean less space available within site boundaries for green and blue infrastructure. This is particularly a concern on account of the fact that the central spine and transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley, associated with the Rivers Ravensbourne and Pool, and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework. Issues associated with higher growth in proximity to the river corridors are discussed further below, but suffice to say here that there are issues associated with certain sites at Lewisham, along the A21 corridor, at Catford and at Bell Green. However, on the other hand, growth can support investment in green infrastructure, e.g. a high growth strategy at BGLS could support the aspiration to deliver a South East London Green Chain Regional Park, which would skirt the southern edge of this area; and growth at Catford will be expected to maximise opportunities to deculvert and naturalise the River Ravensbourne.

In **conclusion**, it is appropriate to highlight lower growth scenarios as preferable, given the inherent issues associated with intensification along river corridors (also in proximity to railway embankments and cuttings, which are often designated as a Site of Importance for Nature Conservation, SINC) although there is much uncertainty in light of growth related opportunities, e.g. river re-naturalisation. Also, there is uncertainty on the basis that lower growth in Lewisham could lead to increased pressure for housing elsewhere. For these reasons significant negative effects are not predicted.

Climate change adaptation

In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone. At Catford the key site to consider is Wickes and Halfords, Catford Road, which is located between the Catford and Catford Bridge railway lines with the River Ravensbourne cutting diagonally through the site to the north in a covered channel. The majority of the site falls within flood risk zone 3, and it would certainly be the case that residential uses will not be acceptable at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain. At BGLS the eastern part of the proposed Bell Green Retail Park site, which would deliver a significant proportion of the additional growth under Scenarios 5 and 6, intersects fluvial flood risk zone 2, associated with the adjacent Pool River, and small part of the Worsley Bridge Road Locally Significant Industrial Site proposed allocation intersects the flood risk zone (including zone 3), with the site notably falling between the railway line and the railway (in a similar fashion to the Wickes and Halfords site at Catford). At Lewisham and along the A21 corridor several sites intersect the flood risk zone, although it is important to recall that a higher growth strategy here (Scenarios 3 to 6) would involve only an assumed 10% uplift. The two adjacent Connington Road proposed allocations are notably associated with the River Ravensbourne, and redevelopment would see development of land currently used for carparking (and hence not vulnerable to flooding); however, the river is culverted here and hence associated with a very narrow flood risk zone. Two further proposed allocations - Silver Road and Axion House; and Ladywell Play Tower – are also strongly associated with the river corridor / flood zone, including significant areas of flood zone 3; however, both sites are near committed, with an application having been submitted for the former site and pre-application discussions underway in respect of the latter site.

In **conclusion**, at this relatively early stage in the plan-making process there is a need to flag an uncertain risk of significant negative effects for all scenarios, and to highlight a particular concern associated with higher growth scenarios, under which there could be less potential to leave areas at risk of flooding as green space. N.B. greenspace also serves to mitigate the urban heat island effect and tall buildings must counter high temperatures from solar gain.

Climate change mitigation

Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of small scale and micropower generation). Delivery of heat networks can prove challenging and costly, hence there is greatest potential to deliver heat networks where there is a concentration of growth and associated economies of scale. This serves to suggest merit in **higher growth** scenarios, noting that all of the growth locations in question, with the exception of the A21 corridor, are associated with strategic sites (e.g. in excess of 500 homes) and/or site clusters that might feasibly support one or more heat networks. However, there is much uncertainty regarding the potential to deliver heat networks in practice. The New Cross Area Framework (2019) does not serve to suggest that this area is suited to delivery of a heat network (the South East London Combined Heat and Power Station is presumably too far distant to the north) and Catford is subject to constraints that could prove a barrier to delivery of heat networks. At Lewisham work has been completed in the past to explore opportunities;³ however, it is not clear that a 10% uplift in development densities would increase the likelihood of opportunities being realised. Higher growth at **BGLS** (Scenarios 5 and 6), on the other hand, represents a clear opportunity, as this is a relatively unconstrained area and there will be the potential to link a mix of uses including employment (thereby helping to ensure a balanced heat demand across the day).

³ See <https://lewisham.gov.uk/my services/planning/policy/ldf/evidence-base/ldf-evidence-base--renewables-and-energy>

In **conclusion**, it is appropriate to highlight Scenarios 5 and 6 as representing a particular opportunity. With regards to effect significance, on the one hand there is a need to recognise the urgency of supporting major interventions in support of climate change mitigation, as reflected in the Borough's declaration of a Climate Emergency; however, on the other hand, climate change mitigation is a global issue such that local actions can only ever have a limited impact. Having made these points it is considered appropriate to highlight the best performing scenarios as giving rise to an uncertain moderately significant positive effect.

Communities (Accessibility)

There are localities in the Borough, particularly where deprivation is experienced, that could benefit from the investment associated with new development, particularly in terms of delivering new and enhanced infrastructure, including community infrastructure, and employment opportunities. Higher growth at **BGLS** (Scenarios 5 and 6) represents a particular opportunity in this respect, recognising that this area falls within the defined Strategic Area of Regeneration that covers the south-eastern part of the Borough. A tall buildings cluster could bring with it a new town centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which might potentially form part of a new Regional Park in the future) a short distance to the south. One of the proposed allocations - Sydenham Green Group Practice - does comprise an existing large health centre; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure linked to the public sector estate programme. With regards to **Catford**, which is associated with a notable concentration of relative deprivation, the proposal under Scenario 1 is to assign indicative residential densities to the four sites within the Catford Town Centre Masterplan Area that accord with existing levels of public transport accessibility, on the basis that this will be supportive of wide ranging regeneration objectives. There could potentially be benefits associated with a higher growth strategy; however, this is highly uncertain, as there is a need to consider the town centre's particular character and function, with its focus on civic and cultural functions, and its relationship with Lewisham to the north. There are also notable opportunities associated with the A21 corridor, between Lewisham and Catford, where the aim is to transform the main road corridor and its immediate surrounds into a series of liveable and healthy neighbourhoods with a distinctive urban character. Particular opportunities include delivery of cycling Quietways and better linking neighbourhoods to open spaces such as Ladywell Fields, Lewisham Park and Mountsfield Park; however, it is difficult to pinpoint particular opportunities associated with a higher growth strategy (i.e. a 10% uplift in homes).

In **conclusion**, numerous proposed allocations will deliver enhancements to community infrastructure and/or improvements to the urban realm and/or infrastructure in support of accessibility, hence it is possible to predict significant positive effects under all scenarios, albeit with a degree of uncertainty at this relatively stage in the plan-making. Scenarios 5 and 6 are identified as performing particularly well, but there remains a degree of uncertainty regarding effect significance ahead of masterplanning for BGLS.

Communities (Housing)

Whilst there is uncertainty at this stage in the planning process regarding the capacity of certain of the proposed allocations, the assumption is that Scenario 1 would meet and modestly exceed the target established by the draft New London Plan (as currently understood),² whilst **higher growth** scenarios would 'close the gap' between housing supply and Local Housing Need (LHN), as understood from the Lewisham Strategic Housing Market Assessment (SHMA, 2019).

In **conclusion**, it is appropriate to place the growth scenarios in an order of preference according to total development quantum. With regards to effect significance, all of the scenarios would lead to moderate significant positive effects on the basis that the London Plan target would be met, and it is appropriate to highlight Scenario 6 as performing particularly well, as it would significantly close the gap to LHN.

N.B. the spatial strategy does also potentially have implications for other 'housing' related matters; however, these are considered to be of secondary importance, relative to the matter of total housing quantum. For example, there is a need to support new genuinely affordable housing in the Borough, including within the defined Strategic Area of Regeneration, and it could also be the case that higher density development leads to greater potential to achieve the Borough's ambition of 50% affordable housing at all strategic sites. There is also a need to question whether a more ambitious strategy, in respect of total housing quantum, could lead to pressure to deliver more small flats rather than the mix of homes recommended by the SHMA (2019), although it is not possible to draw clear inference.

Communities 3 (other issues)

There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. In order to tackle deprivation and ensure equality of opportunity, it will be necessary to ensure all Lewisham residents benefit from future investment in new homes, jobs, town centre uses, and supporting infrastructure, learning from and building upon success stories of recent years. There is a need to address the wide-ranging determinants of inequality, deprivation and also health in a more integrated way, including with a focus on Lewisham's children and young people. Issues (and opportunities) are particularly acute within the Strategic Area of Regeneration, with the current draft policy for this area stating:

"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:

- 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;*
- Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people;*
- 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;*
- Improve the environmental quality of neighbourhoods, including by reducing and mitigating pollution along main roads and junctions."*

Access to high quality community infrastructure (in particular education and health) is critical and has been discussed above under the **'Accessibility'** heading, as has the related matter of improving access to transport infrastructure and improving the quality and permeability of the urban realm. As discussed, a primary objective must be on addressing issues within the defined Strategy Area of Regeneration, noting the links between relative deprivation and equality of opportunity for groups with protected characteristics under the Equalities Act 2010. The Measuring Poverty Report (2019) found, amongst other things, that: nearly half (46%) of people in families with a Black head of household and 37% of people in families with an Asian head of household are in poverty, compared to 19% of people in a family with a White head of household; and nearly half (48%) of people in poverty – totalling 6.8 million people – live in a family where someone is disabled.⁴ However, targeting growth and associated investment to town centres, in particular Catford town centre, is also a key consideration, discussed above.

Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the **'Housing'** heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.⁵ Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

Air and noise pollution is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy high streets, and in particular air and noise pollution, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects).⁶

⁴ See <https://socialmetricscommission.org.uk/>

⁵ See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

⁶ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

Further key considerations relate to the **Economy**, which are a focus of discussion below. One key consideration is avoiding loss employment opportunities in the light industry sector, where employees might find it difficult to work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review 10 Years On (2020) report defines as being “*characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; a fair workplace; promotion of learning development and skills use; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance* (136) (137) (138). *Poor quality work is essentially work with the opposite of these features.*”

Beyond these considerations there are wide-ranging issues to be addressed by the Local Plan; however, it is a challenge to identify any that relate strongly to the spatial strategy. Other key issues can be addressed through policy on matters such as use mixes in town / district centres, and through site specific policies that deal with use mixes, infrastructure delivery and design. These matters are largely independent of the spatial strategy, i.e. it should be the case that issues can be addressed and opportunities realised under any reasonably foreseeable spatial strategy scenario.

As such, and in **conclusion**, the growth scenarios are judged to perform broadly on a par, on the basis that there are so many cross-cutting issues of relevance. There is an argument for predicting significant positive effects; however, taking a precautionary approach significant positive effects are not predicted. Whilst growth scenarios perform well in terms of certain of the cross-cutting issues, there are also tensions.

Economy

By planning to meet employment needs the Local Plan can help to address the challenges facing high streets, assist in growing key sectors and clusters, and ensure that there is a range of employment opportunities available locally, including for those with lower education and skills levels, particularly within the Strategic Area of Regeneration. Focusing on the growth scenarios, a primary consideration relates to the potential for a **higher growth** strategy to limit the potential for effective mixed use redevelopment of existing employment sites. There is a need to exercise caution given evidence showing a need to secure additional employment floorspace in Lewisham, noting a tight demand/supply balance in respect of industrial land, and given recent experience in the north of the Borough, where regeneration has been delivered in part through release of employment land. There are several proposals to redevelop existing Locally Significant Industrial Sites (LSIS), including two proposals at BGLS, namely at Stanton Square and Worsley Bridge Road. In both cases the intention is to deliver new and improved employment floorspace, along with environmental improvements, through the provision of enabling residential uses. At both sites initial indications are that the ratio of homes to m² employment floorspace might be in the region of 11 (under a high growth scenario) to 34 (under a low growth scenario), and there is a commitment to carefully consider the operational requirements of existing and potential future employment uses. Another proposed LSIS allocation within one of the areas that are a focus of this assessment is Molesworth Street Car Park (Lewisham); however, the site currently comprises a car park and the proposal is to deliver an employment-only scheme, hence there are limited or no concerns (also noting that the majority of the LSIS is used as a data-centre).

Having made these points regarding mixed use redevelopment of existing employment sites, it is also important to recognise that the wider employment strategy is also focused on delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The majority of proposed town centre allocations in Lewisham and Catford are set to deliver significant new employment floorspace alongside new housing, including affordable workspace; however, it is difficult to conclude that a higher growth strategy – even a 20% uplift in homes delivered within Catford town centre – would lead to any significant implications, in respect of the effectiveness of the town centre employment strategy. With regards to BGLS, there are clear opportunities with delivery of a new economic hub in the Borough, and it is important to note that a BLE Economic Assessment study is in preparation.

In **conclusion**, it is appropriate to flag a degree of risk associated with higher growth scenarios, although this may be somewhat marginal given a clear Council commitment to avoid further loss of employment sites and deliver a net gain in employment floorspace through mixed use redevelopment of allocated existing employment sites. Significant effects are not predicted.

Historic environment, heritage, character and culture

Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history, which the Lewisham Characterisation Study (2019) breaks down into six periods: Ancient Lewisham (pre-1700s); Town and country (1700-1800); Unlocking the south (1800s-1850s); Rise of the commuter suburbs (1860-1914); Interwar (1915-1949); and Rebuilding Lewisham (1950s onwards). Settlement firstly followed the river valley as far as Catford, before higher land was developed in the mid-1800s. Higher density development under higher growth scenarios can inevitably lead to tensions with objectives relating to the historic environment and character, including on the basis that an increase in tall buildings may sharply contrast with historic low rise townscapes. Notably, the 2019 draft Tall Buildings Report identifies a number of areas "*characterised by very consistent building heights*" and notes that such areas could have particular sensitivity to the development of tall building clusters. In this context, **Catford** is found to be more sensitive to taller buildings than the other locations under consideration here as potentially suitable for higher densities, with a key consideration being the distinctive character of The Broadway, and the buildings of townscape merit that line it (albeit there is only one listed building, which is the grade 2 listed Broadway Theatre), and another consideration being the adjacent and expansive Culverley Conservation Area, which is an Edwardian residential suburb. The **A21 corridor** also stands out as sensitive, albeit the proposal under Scenarios 5 and 6 is to deliver only a modest uplift to densities. In particular, Ladywell Play Tower is highly constrained, with the site strongly associated with several listed buildings including Grade II* listed St Mary's church and churchyard, and highly accessible with the Waterlink Way passing through the site from Ladywell Fields in the west; however, the site is at the pre-application stage, such that its future is likely outside of the control of the Local Plan, and the specific proposal is that residential development (33 homes) can help to facilitate the restoration and enhancement of the Ladywell Baths, which is currently on the Heritage at Risk Register. Also, the PLACE/Ladywell (Former Ladywell Leisure Centre) proposed allocation is adjacent to St Mary's Conservation Area, although the site is part committed. Conversely, Lewisham, New Cross and BGLS give rise to more limited concerns, in respect of higher densities; however, that is not to suggest that these areas are without constraint. At **Lewisham** several sites are assigned indicatively lower densities under Scenario 1 on the basis that they are associated with the transition between the town centre and neighbouring residential areas. At **BGLS** there is a need to consider the cluster of listed buildings / structures associated with Livesey Hall War Memorial, which is adjacent to the west of the gas holders site; the character of the Bellingham Estate to the east, which was influenced by 'garden city' principles and is associated with a homogenous form of low density housing; and locally important buildings within the Stanton Square LSI proposed allocation, including a well-preserved art deco building. Finally, it is important to note that an archaeological priority area follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement.

In **conclusion**, there are concerns associated with higher densities at all of the locations in question, and particular concerns in respect of a tall buildings cluster at Catford. Significant negative effects are predicted for the worst performing scenarios; however, there is much uncertainty, e.g. recognising that a Catford Town Centre Masterplan is in preparation and might be a vehicle for exploring higher growth.

Land and natural resources

As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher density development within the same package of sites that would be allocated under Scenario 1, hence there are limited concerns in respect of 'land'. A Metropolitan Open Land Review has been completed, including with a view to exploring the potential to release a small area of MOL to deliver a realigned South Circular at Catford; however, the spatial strategy alternatives are not likely to have a bearing on this matter. Another consideration relates to minimising waste, ensuring good waste management and supporting a more circular economy, e.g. with construction waste re-used on-site; however, again it is not possible to meaningfully differentiate between the alternatives.

In **conclusion**, all scenarios are considered to perform on a par in relation to land and natural resources, and significant negative effects are not predicted.

Transport

Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under 'air quality', a matter of potential overriding importance is matching development densities to PTAL, and on this basis it is appropriate to highlight a degree of concern associated with higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4), albeit there is uncertainty as Catford town centre has an excellent PTAL rating of 6a and higher growth would be delivered via the Catford Town Centre Masterplan. With regards to **BGLS**, as discussed under 'air quality' and 'accessibility', there is cautious support for higher growth scenarios (Scenarios 5 and 6) from transport perspective, although there remains much uncertainty ahead of masterplanning work. With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, it is difficult to conclude that a small uplift in the number of homes delivered would lead to any notable issues or opportunities, as discussed above.

In **conclusion**, the scenarios perform as per the discussion under 'air quality', above. Moving forward, there should ideally be a re-examination of spatial growth scenarios / reasonable spatial strategy alternatives on the basis of a firm assumption regarding BLE delivery, in order to ensure that the Local Plan spatial strategy responds most appropriately to future PTAL and directs growth so as to realise opportunities in respect of increasing accessibility and delivering transport infrastructure upgrades.

Establishing the preferred growth scenario

The following is the response of the Borough Council's officers to the assessment / reasons for supporting the preferred growth scenario (Scenario 1) -

The London Plan forms part of Lewisham's statutory development plan. It therefore provides the starting point for considering the reasonable alternatives for the spatial strategy, recognising that Lewisham's new Local Plan must be in general conformity with it. This includes the regional strategic framework for the quantum of growth that the Local Plan should seek to deliver, particularly for housing, along with the distribution of this growth throughout the Borough. For Lewisham, the key strategic spatial elements of the London Plan include:

- Focussing growth and new development within identified Opportunity Areas, as well as within and around town centres, particularly major and district centres;
- Safeguarding designated industrial locations and seeking to intensify employment generating uses and development within them;
- Directing new investment to Strategic Areas for Regeneration, and other local areas for regeneration;
- Optimising the use of land by ensuring the density of development is commensurate with existing and expected future public transport accessibility levels, along with facilitating new and improved strategic transport infrastructure to unlock the development potential of areas and sites, particularly with the Bakerloo line extension;
- Protecting and enhancing London's network of green infrastructure, including waterways and open spaces; and
- The priority given to conserving and enhancing heritage assets and their setting.

Giving consideration to the strategic direction of the London Plan, along with the need to address Local Housing Need in line with the National Planning Policy Framework, the council has undertaken a rigorous review of land that is available for redevelopment, and which is likely to be deliverable and developable within the plan period. Informed by this review, a number of reasonable spatial alternatives have been established and considered, exploring variations in the potential distribution and quantum of growth on identified sites and areas.

The appraisal highlights higher growth scenarios as performing well in a number of respects, albeit there would also be environmental tensions, perhaps most notably in respect of heritage, which would need to be appropriately managed. Through the Local Plan, the council is seeking to address identified housing needs as far as possible, as would be the case under higher growth scenarios; however, the ability to do so is highly dependent on the delivery of strategic infrastructure, particularly transport infrastructure and the Bakerloo Line Extension (BLE). All higher growth scenarios assessed above, with the exception of Scenario 2, assume the BLE is delivered within the plan period.

Whilst the London Plan sets out a commitment to deliver the BLE and directs boroughs to safeguard land and plan positively to support its delivery, as of yet, it is not fully funded. In the absence of certainty over the BLE there is a need to progress a spatial strategy in-line with Scenario 1, and to give some further consideration to Scenario 2 as a reasonable alternative, albeit the appraisal finds Scenario 2 preferable to Scenario 1 only in respect of 'housing'. However, there is also a need to progress the Local Plan in the knowledge that certainty in respect of the BLE could be attained ahead of plan finalisation, and that under this scenario the local plan should provide sufficient flexibility to respond quickly, ensuring the capacity of sites is optimised through the commensurate uplift in public transport accessibility. The growth scenarios have explored a number of potential responses to the BLE and, whilst there would be a need for further work to explore opportunities at all locations in proximity to a new BLE station, at this time the option of a more ambitious scheme at BGLS stands-out as performing well.

Assessment of the Draft Plan

Part 2 of the Interim IIA Report presents an assessment of the Draft Plan as a whole, which in practice means taking account of the preferred spatial strategy (which, as discussed, reflects Scenario 1 assessed above) alongside the suite of proposed development management (DM) policies.

The assessment is presented as a series of narratives under the eleven 'SA framework' topic headings, before reaching an overall conclusion. The overall conclusion is presented below.

A note on committed elements of the Local Plan

One important point to note regarding the Draft Plan is that a significant proportion of the proposed allocations are already committed, in that they either already have planning consent or are associated with an advance planning application, such that planning consent is anticipated ahead of adoption of the Local Plan. There is limited potential for the Local Plan to influence such sites, and hence these sites are not a focus of the assessment. This includes a concentration of sites in the north sub-area.

Conclusion on the draft plan

The assessment finds the Draft Plan to perform well in many respects, with significant positive effects predicted in respect of Accessibility and uncertain or moderate significant positive effects predicted in respect of Air quality, Biodiversity, Climate change mitigation, Housing and 'Other communities issues'. The assessment also concludes broadly neutral effects in respect of the Economy, Historic environment, heritage, character and culture and Land and natural resources. **However**, the assessment does 'flag' uncertain significant negative effects in respect of Climate change adaptation objectives, given a proposal to allocate several sites that intersect the fluvial flood risk zone. Table D presents further information.

Table E: Conclusions on the Draft Plan as a whole

| Conclusion on significant effects | IIA topic | Commentary |
|-----------------------------------|-----------------------------|--|
| Positive | Communities (accessibility) | <p>The proposed spatial strategy is supported on the basis that proposed indicative densities are assigned taking careful account of PTAL; numerous proposed allocations will support walking/cycling including, along the A21 corridor, and/or links between greenspace access to greenspace; the proposed approach to Catford is supportive of the aims of the Catford Town Centre Masterplan, including in respect of improved town centre permeability and realignment of the South Circular; and no concerns are highlighted in respect of impacts to existing community infrastructure (one proposed allocation comprises an existing health centre, which will be re-provided). Masterplanned strategic redevelopment of adjacent sites in the Bell Green / Lower Sydenham (BGLS) area is strongly supported, given the location of this area within the Strategic Area of Regeneration that extends across the southern extent of the Borough, and the plan's commitment to progressing a more ambitious scheme under a BLE Phase 2 scenario is particularly supported, from an accessibility perspective.</p> <p>With regards to the proposed DM policies, the plan notably includes a suite of 'Community infrastructure' focused policies, which present firm commitments in respect of safeguarding existing community infrastructure alongside delivery of new and enhanced community infrastructure, and wide-ranging other proposed policies are also supportive of accessibility objectives, including the suites of policies presented within the 'Green infrastructure' and 'Transport and connectivity' sections of the plan.</p> |
| Moderate or uncertain positive | Air quality | <p>The proposed spatial strategy is supported on the basis that proposed indicative densities are assigned taking careful account of PTAL; numerous proposed allocations will support walking/cycling including, along the A21 corridor, and/or links between greenspace access to greenspace; and the proposed approach to Catford is supportive of the aims of the Catford Town Centre Masterplan, including in respect of improved town centre permeability and realignment of the South Circular. Masterplanned strategic redevelopment of adjacent sites at BGLS is strongly supported, given the potential to assist with reducing car dependency amongst residents of nearby neighbourhoods, and there will be particular opportunities under a BLE Phase 2 scenario.</p> <p>With regards to the proposed DM policies, PolicySD6 (Improving air quality) sets stringent requirements on planning applications; however, moving forward, it will be important to ensure that the firm focus of the Local Plan is on avoiding air pollution / air quality impacts, noting that the effectiveness of mitigation measures can often be associated with a degree of uncertainty. The following statement made within the supporting text to PolicySD6 is of note: <i>"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</i></p> |

| Conclusion on significant effects | IIA topic | Commentary |
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| | | <i>quality benefits. Mitigation measures may be secured either by planning condition or legal agreement...</i> |
| Moderate or uncertain positive | Biodiversity | <p>On one hand the proposed spatial strategy leads to a degree of concern as the proposal is to focus delivery of and intensify uses along the river valley through the centre of the Borough, which is also the main transport corridor and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework. However, on the other hand, growth can support investment in green infrastructure, e.g. growth at BGLS could support the aspiration to deliver a South East London Green Chain Regional Park, which would skirt the southern edge of this area; and growth at Catford will be expected to maximise opportunities to deculvert and naturalise the River Ravensbourne. Another related matter is the proposed allocation of several sites adjacent to a Site of Importance to Nature Conservation, including sites adjacent to a railway embankment or cutting.</p> <p>With regards to the proposed DM policies, the plan notably includes a suite of 'Green infrastructure' focused policies, with policies on Green infrastructure; Open space and Lewisham's green grid; Biodiversity and access to nature; Urban greening and trees; Food growing and Geodiversity. The following statement, made within the supporting text, relates to a key strategic opportunity: <i>"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."</i></p> |
| Moderate or uncertain positive | Climate change mitigation, | <p>Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of small scale and micro power generation, e.g. solar panels). Delivery of heat networks can prove challenging and costly, hence there is greatest potential to deliver heat networks where there is a concentration of growth and associated economies of scale. This serves to highlight the proposed strategic masterplanned redevelopment at BGLS as representing a clear opportunity, and this will particularly be the case under a higher growth / BLE Phase 2 scenario.</p> <p>With regards to the proposed DM policies, the plan notably includes policies on: Responding to the climate emergency; Sustainable design; Minimising greenhouse gas emissions; and Energy infrastructure. With regards to energy networks, there is a requirement that all proposals for major residential and commercial development will be expected to submit a feasibility assessment to <i>"fully evaluate connecting to an existing or planned future heat network where it is located on or in proximity to the</i></p> |

| Conclusion on significant effects | IIA topic | Commentary |
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| | | <p><i>site</i>"; however, there is a need to recall that opportunities will largely be dictated by spatial strategy in practice. With regards to sustainable design and construction, a range of stringent requirements are proposed, including in respect of achieving nationally recognised standards (Home Quality Mark, BREEAM); however, there will be a need for further work ahead of plan finalisation to ensure a suitably ambitious approach, taking account of the national context (a consultation on "The Future Homes Standard: changes to Part L and Part F of the Building Regulations for new dwellings" closed in October 2019) and development viability considerations.</p> |
| Moderate or uncertain positive | Communities (housing) | <p>Whilst there is uncertainty at this stage in the planning process regarding the capacity of certain of the proposed allocations, the assumption is that the package of proposed allocations, when combined with additional supply from sites that have already delivered housing in the plan period and small sites / windfall sites that do not require an allocation, will modestly exceed the target established by the draft New London Plan, as currently understood. Additionally, the Draft Local Plan is clear that it will be possible to achieve a significant uplift in homes at BGLS under a BLE Phase 2 scenario, which would serve to significantly 'close the gap' between housing supply and Local Housing Need (LHN), as understood from the Lewisham Strategic Housing Market Assessment (SHMA, 2019).</p> <p>With regards to the proposed DM policies, the Draft Local Plan includes a section dedicated to Housing, comprising eleven separate policies covering topics including: Genuinely affordable housing; Housing estate maintenance, renewal and regeneration; High quality housing design; Accommodation for older people; Supported accommodation; Purpose built student accommodation; Housing with shared facilities (Houses in Multiple Occupation); and Gypsy and traveller accommodation.</p> <p>Delivery of genuinely affordable housing is a clear corporate priority for the Borough Council, and this is reflected in the Draft Local Plan Policy, with the following being a key statement made within the supporting text: <i>"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 18 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."</i> Moving forward, it will be important to consider the viability of achieving affordable housing objectives alongside other objectives, e.g. in respect of climate change mitigation.</p> <p>Policy HO2 (Optimising the use of small housing sites) is also of central importance. The aim is to boost the delivery of small housing development beyond the historic delivery levels, in light of the NPPF emphasis on diversifying the supply of sites and the</p> |

| Conclusion on significant effects | IIA topic | Commentary |
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| | | ambitious approach proposed by the draft London Plan (2017). Small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, 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 real improvement that can help to address the underlying causes of deprivation. |
| Moderate or uncertain positive | Communities (other issues) | <p>There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. It is a challenge to identify aspects of the spatial strategy that relate strongly to equalities, health and 'other community' objectives, as has been discussed above as part of the assessment of growth scenarios; however, broadly speaking key elements of the spatial strategy are: A) a focus on the Strategic Area of Regeneration (including support for a high growth strategy at BGLS under a BLE P2 scenario); support for growth, investment and regeneration within town centres, in particular Catford; and C) support for improved movement infrastructure and improved urban realm along transport corridors, including the A21. Other considerations relate to implications of the spatial strategy for access to employment opportunities, including for those with lower skills, and possibility of flood risk disproportionately impacting poorer neighbourhoods is a further consideration. These matters are discussed in further detail elsewhere, both as part of the assessment of growth scenarios and as part of this summary discussion of the Draft Plan as a whole.</p> <p>With regards to the proposed DM policies, the Draft Local Plan includes requirements in respect of numerous matters that will help to ensure that development has the effect of reducing inequality, supporting good health and addressing pockets of relative deprivation and poor health in the Borough. As discussed above, stringent policies are proposed in respect of matters including community infrastructure, affordable and specialist housing needs, and policy in respect of air quality is also of note, as this is an important health related consideration. Policy support for an increase in the number of homes delivered at small sites in the Borough's Strategic Area of Regeneration is another key consideration, as discussed above under 'Housing'. Also of note here are policies proposed in respect of environmental health considerations, with the Draft Local Plan including policies on: Amenity and agent of change; Noise and vibration; External lighting; Building alterations, extensions and basement development; and Infill and backland sites, back gardens and amenity areas.</p> |
| Moderate or uncertain positive | Heritage, character, culture | The spatial strategy reflects a carefully targeted approach to assigning indicative development densities to sites, with density assigned via a design-led approach (as opposed to on the basis of the London Plan SHLAA standard methodology) at a selection of sensitive sites. At Lewisham several sites are assigned lower densities under Scenario 1 on the basis that they are associated |

| Conclusion on significant effects | IIA topic | Commentary |
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| | | <p>with the transition between the town centre and neighbouring residential areas. At BGLS there is a need to consider the cluster of listed buildings / structures to adjacent to the west of the gas holders, the heritage value of the gas holders themselves, the distinctive townscape and character of the Bellingham Estate to the east (which was influenced by 'garden city' principles and is associated with a homogenous form of low density housing) and locally important buildings within the Stanton Square LSIS proposed allocation, including a well-preserved art deco building. Finally, it is important to note that an archaeological priority area follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement.</p> <p>With regards to DM policies, the Local Plan includes a section on Heritage, with policies covering: Lewisham's historic environment; Designated heritage assets; Non-designated heritage assets; and Enabling development. The following is a key statement <i>"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."</i></p> <p>It is also important to note the importance of site specific policy. Taking just one example, site specific policy for the Lewis Grove proposed allocation in Lewisham states: <i>"The scale of development should respond to the scale of the historic High Street. Taking into account potential impact on heritage assets... The Grade II Listed Clocktower should remain discernible and continue to function as a significant landmark and way finding feature... The site features several buildings of architectural merit which should be retained."</i></p> |
| Moderate or uncertain positive | Transport | <p>Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under 'air quality', a matter of potential overriding importance is matching development densities to PTAL, and in this respect the proposed spatial strategy is supported. With regards to BGLS, as discussed under 'air quality' and 'accessibility', there is cautious support for the Local Plan's commitment to follow a more ambitious, higher density growth strategy under a BLE Phase 2 scenario. All of these factors serve to suggest the likelihood of significant positive effects, although there remains a degree of uncertainty at this stage in the plan-making process, with the potential for more detailed work to understand how the spatial strategy might best serve to respond to existing transport</p> |

| Conclusion on significant effects | IIA topic | Commentary |
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| | | <p>issues/opportunities and also the extent to which transport impacts can be mitigated.</p> <p>With regards to the proposed development management policies, the Draft Local Plan includes a section dedicated to Transport and connectivity with policies on: Sustainable transport and movement; Bakerloo line upgrade and extension; Healthystreets as part of healthy neighbourhoods; Parking; Deliveries, servicing and construction; Taxis and private hire vehicles; and Digital and communications infrastructure and connectivity. The policies are notably cross-cutting; for example supporting text explains that: <i>“High quality public realm underpins the integrated approach to land use and transport... 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).”</i></p> |
| Neutral / uncertain | Economy | <p>Several proposed allocations comprise existing Locally Significant Industrial Locations (LSIS), and whilst the firm commitment is to ensure no-net-loss of employment floorspace, and to deliver new employment floorspace that meets the needs of existing businesses and key growth sectors, there is inevitably a degree of risk regarding the potential to effectively co-locate residential and light industrial uses. It is on this basis that it is not possible to predict the likelihood of significant positive effects at this stage in the plan-making process. There is a need to exercise caution given evidence showing a need to secure additional employment floorspace (also retail) in Lewisham, noting a tight demand/supply balance in respect of industrial land, and given recent experience in the north of the Borough, where regeneration has been delivered in part through release of employment land.</p> <p>Having made these points regarding mixed use redevelopment of existing employment sites, it is also important to recognise that the wider employment strategy is also focused on delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The majority of proposed town centre allocations in Lewisham and Catford are set to deliver significant new employment floorspace alongside new housing, including affordable workspace.</p> <p>With regards to the proposed DM policies, the Draft Local Plan includes a range of relevant policies within the section on Economy and culture. The following is considered to be a particularly important statement: <i>“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...”</i> Other key policies relate to support for the creative and cultural industries, designation of new</p> |

| Conclusion on significant effects | IIA topic | Commentary |
|-----------------------------------|---------------------------|--|
| | | Cultural Quarters, nighttime economy hubs, flexibility for a much wider range of uses in town centres (for district centres, removing threshold approach for retaining A1 uses) and new policy on affordable workspace. |
| Moderate or uncertain negative | Climate change adaptation | <p>In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that is a focus of proposed growth is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone. At Catford the key site to consider is Wickes and Halfords, Catford Road, which is located between the Catford and Catford Bridge railway lines with the River Ravensbourne cutting diagonally through the site to the north in a covered channel. The majority of the site falls within flood risk zone 3, and it would certainly be the case that residential uses will not be accessible at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain. At BGLS the eastern part of the proposed Bell Green Retail Park site intersects flood risk zone 2, associated with the adjacent Pool River, and small part of the Worsley Bridge Road Locally Significant Industrial Site proposed allocation intersects the flood risk zone (including zone 3), with the site notably falling between the railway line and the railway (in a similar fashion to the Wickes and Halfords site at Catford). At Lewisham and along the A21 corridor several sites intersect the flood risk zone, including the two adjacent Connington Road proposed allocations, where the proposal is to develop land currently used for carparking (and hence not vulnerable to flooding); however, the river is culverted here and hence associated with a very narrow flood risk zone. Two further proposed allocations - Silver Road and Axion House; Ladywell Play Tower - are also strongly associated with the river corridor / flood zone, including significant areas of flood zone 3; however, both sites are near committed, with an application having been submitted for the former site and pre-application discussions underway in respect of the latter.</p> <p>With regards to the proposed DM policies, Policy SD7 (Reducing flood risk) commits to taking a sequential approach to avoiding flood risk, with development in the flood zone only in exceptional circumstances, which serves to highlight the importance of further detailed work prior to plan finalisation. Supporting text goes on to explain that: "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)."</p> |

Next Steps

Finalisation of the Draft Plan

At the current time the Draft Plan and this summary version of the Interim IIA Report is available for scrutiny by the Borough's Council's Mayor and Cabinet. Adjustments may subsequently be made to the plan prior to further scrutiny by Full Council. The Interim IIA Report will be finalised for Full Council.

Preparation of the Proposed Submission Plan

Subsequent to consultation on the Draft Plan it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim IIA Report, responses to the current consultation and further assessment work.

The IIA Report will be published alongside the Proposed Submission Plan, as required by legislation. It will provide all of the information required by the SEA Regulations 2004.

Submission and examination

Once the period for representations on the Proposed Submission Plan / IIA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the IIA Report.

At Examination the Inspector will consider representations before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications these will be prepared (potentially alongside IIA) and then subjected to consultation (potentially with an SA Report Addendum published alongside).

Once found sound the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published setting out, amongst other things, 'measures decided concerning monitoring'.

Monitoring

At the current time, in-light of the assessment findings presented above in respect of the Draft Local plan, it is suggested that monitoring might focus on: Loss of light industrial land, potentially with a focus on the needs of specific types of business; and development in a flood risk zone, and also potentially adjacent to the flood risk zone given uncertainty regarding future flood risk given climate change.