

Overview and Scrutiny



Sustainable Development Select Committee Agenda

7.00 pm, Tuesday, 23 November 2021
Civic Suite, Lewisham Town Hall
London SE6 4RU and online at:
<https://lewisham.public-i.tv/core/portal/webcasts>

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Part 1

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Sustainable Development Select Committee Members

Members of the committee, listed below, are summoned to attend the meeting to be held on Tuesday, 23 November 2021.

Kim Wright, Chief Executive
Monday, 15 November 2021

Councillor Louise Krupski (Chair)	
Councillor James-J Walsh (Vice-Chair)	
Councillor Obajimi Adefiranye	
Councillor Suzannah Clarke	
Councillor Leo Gibbons	
Councillor Mark Ingleby	
Councillor Paul Maslin (ex-Officio)	
Councillor Octavia Holland (ex-Officio)	

Minutes of the Sustainable Development Select Committee

Wednesday, 15 September 2021 at 7.00 pm

Present: Councillors Louise Krupski (Chair), James-J Walsh (Vice-Chair), Obajimi Adefiranye, Suzannah Clarke, Leo Gibbons and Mark Ingleby

Also present: Councillor Paul Maslin (Chair of Overview and Scrutiny), Councillor Patrick Codd (Cabinet Member for Environment & Transport), Timothy Andrew (Scrutiny Manager), Zahur Khan (Director of Public Realm), David Syme (Head of Strategic Planning), Nathan Vear (Interim Head of Street Environment Services) and Kenny Wilks (Directorate Support Public Realm)

1. Minutes of the meeting held on 30 June 2021

- 1.1 Members requested that a reference to the 'cleaner Lewisham application' be amended to refer to 'Love Clean Streets'.
- 1.2 **Resolved:** that subject to the clarification raised by members – the minutes of the meeting held on 30 June 2021 be agreed as an accurate record.

2. Declarations of interest

- 2.1 Councillor Mark Ingleby declared an interest in relation to item three as Chair of the Grove Park Nature Reserve.
- 2.2 Councillor James-J Walsh declared an interest in relation to item four as a resident in close vicinity to the A21.

3. Responses from Mayor and Cabinet

- 3.1 Councillor Ingleby addressed the Committee, noting the provision of new information by a local group and asking for further consideration of a metropolitan open land designation in Grove Park.
- 3.2 **Resolved:** the Committee would refer its views to Mayor and Cabinet as follows –
 - The Committee recommends that Mayor and Cabinet should give consideration to the additional evidence provided by the Friends of Railway Children Walk – as well as the comments and suggestions made by Councillor Ingleby - in determining the potential for the collection of sites of importance for nature conservation within the complex of open spaces situated either side of the Hither Green railway corridor to constitute a broader site of metropolitan importance for nature conservation (MSINC).

4. A21 development framework

- 4.1 David Syme introduced the report and responded to questions from the Committee – the following key points were noted:
 - There had been changes to the funding arrangements for the delivery of the project, which represented a small risk for the Council.
 - Some helpful input had been received from Transport for London (TfL) – particularly at the beginning of the project, however TfL staff working on these issues were furloughed during the development of the framework

and were now assigned only to work on schemes that had been granted funding (which the A21 development framework had not).

- Lewisham Hospital had been working on options for consolidating their services – however this work was interrupted by the pandemic. Without clarity from the hospital about its future plans it was omitted from the framework. It could be added in the future.
- The development of the A21 framework was due to run alongside a pre-feasibility project with TfL led by the Council's transport team. However, the status of this project was currently unclear.
- A number of sites were omitted from the development framework due to advanced pre-application discussions taking place.
- The guidance in the framework was in line with the requirements in the London Plan to redevelop underutilised retail spaces (such as large 'box store' type developments with large car parks) into mixed use and residential developments.
- Consideration could be given to site uses which might cause problems with access or traffic and officers would welcome further suggestions from members.
- A supplementary planning document (SPD) had a formalised and robust status in planning terms – whereas a framework (whilst a material planning consideration) did not.
- The framework could be upgraded (to an SPD) in the future. This would require additional policy work and resourcing.
- The framework document would help in future conversations about decision making and funding with TfL.
- Consideration would be given to including guidance on electric vehicle charging points in the framework.
- One of the principals in the strategy was to widen spaces for pedestrians where possible, whilst also accommodating space for cyclists, busses and cars.
- Consideration would be given to the impact of lighting on perceptions of public safety.
- Further thought would be given to the east west links in the framework.
- Densities on development sites were increasing – in line with policies for the effective utilisation of space. This would have an impact on the design of streetscapes – as taller buildings were incorporated.

4.3 **Resolved:** that the Committee would refer its views to Mayor and Cabinet as follows –

- The Committee commends the work carried out by officers. The Committee recognises the calibre and high quality of the work carried out and it recommends that the development framework is adopted.
- The Committee recommends that consideration be given to the future options for the framework to be strengthened through its adoption as a supplementary planning document.

- The Committee believes that officers should continue to work with Transport for London in order to ensure that collaboration, coordination and funding are made available to support the development of cycling and walking infrastructure along the A21.

5. Street environment services

- 5.1 Nathan Vear introduced the report – and gave a presentation providing an update on the performance, finances and current objectives of the environment service.
- 5.2 Nathan Vear responded to questions from the Committee – the following key points were noted:
- The Head of Commercial Operations (Seamus Adams) was responsible for markets, car boot sales and commercial waste. He would be asked to provide updates for members on the proportion of the borough's commercial waste collected by the Council and progress on setting up reuse and recycling events.
 - The Head of Commercial Operations was also delivering the fly-tipping enforcement programme.
 - He would give further consideration to the issues raised by the Committee in its referral at the 30 June meeting.
 - A written response had been provided to the executive member on the Council's motion on 'community skip days'.
 - Many authorities had trialled community skip days and had decided against them. This was because they were difficult to control and may promote fly-tipping. Additionally, waste that was collected could not be recycled.
 - Local authorities had been providing waste education for many years – but it was an ongoing process.
 - Once the waste strategy was agreed a waste communications plan would be developed.
 - Consideration was being given to additional options for focused engagement and education.
 - There were opportunities to reset and restate service standard in future – in order to provide clarity to residents.
 - Consideration could be given to expanding the provision of bulky waste services.
 - A waste composition analysis had been carried out – which indicated that 27 percent of recycling was contaminated. This issue required consistent communication because it was expensive to dispose of contaminated recycling loads.
 - About a third of the contamination was made up of non-recyclable plastic. This was a nationwide issue.
 - Consideration had been given to different approaches to composting and disposal of bio-degradable waste. A trial was currently taking place with Lewisham Homes on food waste collection on estates.
 - One of the things that needed consideration was the variety of different ways that residents engaged with services.
 - Options for the management and control of weeds were being explored.

- 5.3 In Committee discussions the following key points were also noted:
- Members had produced their own materials for educating residents about fly-tipping.
 - It was important to engage with the community to improve the delivery of waste services.
 - It was important to ensure that work was taking place to improve streets and environment services in advance of Lewisham’s year as borough of culture.
 - Members welcomed the work that had taken place to control overspending and financial pressures.
 - Lewisham should aim to be ‘best in class’ in terms of the cleanliness of its streets.
 - Further information was required about how the waste strategy would be implemented and the types of investment it would require.
 - Members were supportive of the idea of working on the development of policy for the service.
 - There should be close alignment between the environment service and planning – to ensure that new developments supported the implementation of the Council’s waste strategy.

5.4 Councillor Patrick Codd addressed the Committee welcoming members’ input and highlighting the importance of waste services – as well as acknowledging the need for further transformation.

5.5 **Resolved:** that the report be noted. The Committee also agreed to take part in policy development workshops for the service.

6. Select Committee work programme

6.1 The Committee discussed the programmes of its upcoming meetings – the following key points were noted:

- Lewisham cyclists should be invited to the meeting regarding the transport strategy.
- The Public Transport Liaison Committee was due to meet to discuss transport related issues in the borough. A number of transport services had been changed or lost during the pandemic.
- The Strategic Planning Committee was going to hold a session on the development of the Local Plan – to which members would be invited.
- Members were willing to take part in policy development workshops relating to the implementation of the waste strategy.

6.2 **Resolved:** that the work programme report be noted.

Chair:

Date:



Sustainable Development Select Committee

Declarations of Interest

Date: 2021-22

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Chief Executive (Director of Law and Governance)

Outline and recommendations

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

1. Summary

- 1.1. Members must declare any personal interest they have in any item on the agenda. There are three types of personal interest referred to in the Council's Member Code of Conduct:
 - (1) Disclosable pecuniary interests
 - (2) Other registerable interests
 - (3) Non-registerable interests.
- 1.2. Further information on these is provided in the body of this report.

2. Recommendation

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

3. Disclosable pecuniary interests

3.1 These are defined by regulation as:

- (a) Employment, trade, profession or vocation of a relevant person* for profit or gain
- (b) Sponsorship –payment or provision of any other financial benefit (other than by the Council) within the 12 months prior to giving notice for inclusion in the register in respect of expenses incurred by you in carrying out duties as a member or towards your election expenses (including payment or financial benefit from a Trade Union).
- (c) Undischarged contracts between a relevant person* (or a firm in which they are a partner or a body corporate in which they are a director, or in the securities of which they have a beneficial interest) and the Council for goods, services or works.
- (d) Beneficial interests in land in the borough.
- (e) Licence to occupy land in the borough for one month or more.
- (f) Corporate tenancies – any tenancy, where to the member’s knowledge, the Council is landlord and the tenant is a firm in which the relevant person* is a partner, a body corporate in which they are a director, or in the securities of which they have a beneficial interest.
- (g) Beneficial interest in securities of a body where:
 - (a) that body to the member’s knowledge has a place of business or land in the borough; and
 - (b) either:
 - (i) the total nominal value of the securities exceeds £25,000 or 1/100 of the total issued share capital of that body; or
 - (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person* has a beneficial interest exceeds 1/100 of the total issued share capital of that class.

*A relevant person is the member, their spouse or civil partner, or a person with whom they live as spouse or civil partner.

4. Other registerable interests

4.1 The Lewisham Member Code of Conduct requires members also to register the following interests:

- (a) Membership or position of control or management in a body to which you were appointed or nominated by the Council
- (b) Any body exercising functions of a public nature or directed to charitable purposes, or whose principal purposes include the influence of public opinion or policy, including any political party
- (c) Any person from whom you have received a gift or hospitality with an estimated value of at least £25.

5. Non registerable interests

- 5.1. Occasions may arise when a matter under consideration would or would be likely to affect the wellbeing of a member, their family, friend or close associate more than it would affect the wellbeing of those in the local area generally, but which is not required to be registered in the Register of Members' Interests (for example a matter concerning the closure of a school at which a Member's child attends).

6. Declaration and impact of interest on members' participation

- 6.1. Where a member has any registerable interest in a matter and they are present at a meeting at which that matter is to be discussed, they must declare the nature of the interest at the earliest opportunity and in any event before the matter is considered. The declaration will be recorded in the minutes of the meeting. If the matter is a disclosable pecuniary interest the member must take no part in consideration of the matter and withdraw from the room before it is considered. They must not seek improperly to influence the decision in any way. **Failure to declare such an interest which has not already been entered in the Register of Members' Interests, or participation where such an interest exists, is liable to prosecution and on conviction carries a fine of up to £5000**
- 6.2. Where a member has a registerable interest which falls short of a disclosable pecuniary interest they must still declare the nature of the interest to the meeting at the earliest opportunity and in any event before the matter is considered, but they may stay in the room, participate in consideration of the matter and vote on it unless paragraph 6.3 below applies.
- 6.3. Where a member has a registerable interest which falls short of a disclosable pecuniary interest, the member must consider whether a reasonable member of the public in possession of the facts would think that their interest is so significant that it would be likely to impair the member's judgement of the public interest. If so, the member must withdraw and take no part in consideration of the matter nor seek to influence the outcome improperly.
- 6.4. If a non-registerable interest arises which affects the wellbeing of a member, their, family, friend or close associate more than it would affect those in the local area generally, then the provisions relating to the declarations of interest and withdrawal apply as if it were a registerable interest.
- 6.5. Decisions relating to declarations of interests are for the member's personal judgement, though in cases of doubt they may wish to seek the advice of the Monitoring Officer.

7. Sensitive information

- 7.1. There are special provisions relating to sensitive interests. These are interests the disclosure of which would be likely to expose the member to risk of violence or intimidation where the Monitoring Officer has agreed that such interest need not be registered. Members with such an interest are referred to the Code and advised to seek advice from the Monitoring Officer in advance.

8. Exempt categories

- 8.1. There are exemptions to these provisions allowing members to participate in decisions notwithstanding interests that would otherwise prevent them doing so. These include:-
 - (a) Housing – holding a tenancy or lease with the Council unless the matter relates to your particular tenancy or lease; (subject to arrears exception)
 - (b) School meals, school transport and travelling expenses; if you are a parent or

guardian of a child in full time education, or a school governor unless the matter relates particularly to the school your child attends or of which you are a governor

- (c) Statutory sick pay; if you are in receipt
- (d) Allowances, payment or indemnity for members
- (e) Ceremonial honours for members
- (f) Setting Council Tax or precept (subject to arrears exception).

9. Report author and contact

- 9.1. Stephen Gerrard, Director of Law and Governance, stephen.gerrard@lewisham.gov.uk,
020 83147648



Mayor and Cabinet

Response to recommendations on the Waste strategy by the Sustainable Development Select Committee arising from the Committee's meeting on 30th June 2021.

Date: 6th October 2021

Key decision: No.

Class: Part 1.

Ward(s) affected: All

Contributors: Executive Director for Housing, Regeneration and the Public Realm

Outline and recommendations

The Sustainable Development Select Committee met on 30th June 2021 to consider its response to the draft Waste Strategy 2021-2031. This report presents the views of the Committee to Mayor and Cabinet and offers considered advice from officers.

It is recommended that Mayor and Cabinet note the Committee's recommendations and take account of Officer responses when it consider the forthcoming Waste Strategy.

1. Summary

- 1.1. This report presents the Sustainable Development Select Committee's response to the consultation of the draft Waste Strategy 2021-2031. The committee met on 30th June 2021.

2. Recommendations

- 2.1. It is recommended that Mayor and Cabinet note the Committee's recommendations and take account of Officer responses when it considers the forthcoming Waste Strategy.

3. Policy Context

- 3.1 The Council's Corporate Strategy 2018-2022 identifies seven priorities, one of which is to ensure we contribute to making Lewisham greener so everyone can enjoy our green

spaces and benefit from a healthy environment as we work to protect and improve our local environment. Efficiently dealing with recyclable waste will help the Council to deliver this outcome.

- 3.2 Lewisham Council declared a climate emergency in February 2019. As a result, the Council must take appropriate action to achieve its goal of carbon neutrality by 2030 in all aspects of its work, including waste management.
- 3.3 The Government's Resources and Waste Strategy, published in 2018, builds on its 25-year Environment Plan commitments. The Strategy contains five strategic ambitions that frame the Council's Waste Strategy:
- to eliminate food waste to landfill;
 - to double resource productivity;
 - to ensure all plastic packaging placed on the market is recyclable, reusable or compostable;
 - to eliminate avoidable waste;
 - to eliminate avoidable plastic waste.
- 3.4 The Mayor of London published his London Environment Strategy (LES) in May 2018 and set objectives, targets and policies for the effective management of London's municipal waste, which accelerates the transition to a circular economy. The objectives, targets and minimum service levels relevant to Lewisham's waste strategy include:
- Objective 7.1 - drive resource efficiency to reduce food waste and single-use packaging
 - Objective 7.2 – maximise recycling rates
 - Objective 7.3 - reduce the environmental impact of waste (greenhouse gas emissions and air pollutants)
 - Objective 7.4 - maximise local waste sites and ensure London has sufficient infrastructure to manage the waste it produces.

London-wide targets:

- To cut food waste and associated packaging waste by 50% per person by 2030
- To achieve a 65% municipal waste recycling rate by 2030, including a 50% recycling rate for local authority collected waste (LACW) by 2025
- To send zero biodegradable or recyclable waste to landfill by 2026
- To manage net 100% of all waste it produces by 2026

4. Select Committee Recommendations

- 4.1. The Sustainable Development Select Committee discussed the draft Waste Strategy 2021-2031 at its meeting on the 30th June 2021. The item's focus was the Council's overall objective for the sustainable management of waste and how the Strategy contributes to the Council's priority to make Lewisham greener by taking better care of our local environment and the planet.

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4.2. The Waste Strategy identifies six policy themes that are needed to deliver the national and regional policy framework above, meet legal requirements, and deliver the Council's objectives, namely:

- 1) Leading the way forward
- 2) Shaping services to follow the Waste Hierarchy
- 3) Working together for an improved local environment
- 4) Using waste as a resource following the circular economy principles
- 5) Reducing carbon emissions, decreasing energy waste and improving air quality
- 6) Adding social value

4.3. The table captures the Committee's recommendations and officer's response for Mayor and Cabinet to consider:

Theme	Recommendations of the Committee	Officer's Response
<p>1. Collection of waste – flats above shops.</p>	<p>The Committee recommends that – where residents live above shops or on high streets and are required to leave their refuse for collection on the pavement – consideration should be given to demarcating these collection areas to avoid confusion and the perception of the levels of illegal dumping.</p>	<p>Flats above shops already receive 'time banded' collections to ensure their rubbish is promptly collected in a way that minimises the amount of time waste is left on the pavement for long periods. Collections from flats above shops take place in areas that have a high proportion of flatted dwellings.</p> <p>Officers continually review opportunities to improve communication and signage in areas receiving timed collections, provide relevant information to residents about collection times, and have enforcement policies where collections times are not adhered to.</p> <p>Officers will consider opportunities to trial demarcation of collection areas in light of the Waste Strategy that is nearing the end of a public consultation process. Given the propensity for a minority of residents to fly-tip bagged household waste on the public highway, officers are concerned that this approach will lead to semi-formalised fly-tipping points. Furthermore, a number of pavements in the borough are narrow, which may lead to the potential for waste to obstruct the</p>

Theme	Recommendations of the Committee	Officer's Response
		<p>public highway.</p> <p>It is proposed that the recommendation is considered in light of the Council's Waste Strategy, once adopted.</p>
<p>2. Approach to fly-tipping</p>	<p>The Committee recommends work to develop a rounded Council-wide approach to illegal dumping. This should include options for utilising the full force of the Council's powers – including measures such as anti-social behaviour orders on businesses, section 215 notices and any powers available for enforcement against landlords in the private rented sector.</p>	<p>The Council is actively working with its Parking Enforcement Contractor, NSL Ltd, to bring additional staff to its existing environmental enforcement team.</p> <p>Fly-tipping costs the Council £1m per year, and so a key aim of the Enviro-Crime Enforcement Team is to tackle and reduce fly-tipping.</p> <p>In addition, the team supports the Cleaner Lewisham programme and promotes civic pride to make the borough a greener and cleaner place for residents, businesses and visitors. The team also works with businesses to ensure their waste is appropriately disposed.</p> <p>It is proposed that following the adoption of the Council's Waste Strategy, a rounded policy-led approach to tackling illegal dumping is developed and applied.</p>
<p>3. Communications</p>	<p>The Committee believes a clear communications campaign is needed on the Council's preferred mobile and online applications and reporting routes.</p>	<p>The draft Waste Strategy highlights residents', businesses', and visitors' role in waste reduction and recycling. As a result, the Council must employ a range of measures to achieve these aims, and a comprehensive multi-platform communication campaign will be needed. Officers are focused on delivering services within the financial envelope determined by the council and will endeavour to identify funding for waste communications within existing budgets.</p> <p>It is proposed that a waste marketing</p>

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Theme	Recommendations of the Committee	Officer's Response
		and communications plan is developed to mobilise the Council's Waste Strategy following adoption.
4. Reporting incidents and complaints	The Committee recommends that the methods residents and businesses can report environmental issues digitally –to aggregate comments and reports into a single place – are reviewed	<p>Officers are reviewing the use and implementation of the Cleaner Lewisham app, which uses the Love Clean Streets platform. The review will ensure sufficient capacity in place to service the app and integrate it with existing Council software. Officers will also review the variety of channels that the public can use to report issues to the Council. To ensure the Council can operate as effectively and efficiently as possible, one method is favoured.</p> <p>A relaunch of the app is anticipated in the spring of 2022 once the review has been completed and functionality improved.</p>
5. Reuse	The Committee recommends that an assertive strategy to find operators for new second-hand, reuse and resale markets in the borough is needed. In addition, the Committee believes consideration should be given to the options for licensing commercial resellers to access the Council's reuse and recycling centre.	<p>The Council is aware that more needs to be done on waste reduction, which includes the reuse of materials.</p> <p>To this end, the draft Waste Strategy contains objectives to create a sharing and reuse network in partnership with local enterprises and businesses.</p>
6. Campaigns	The Committee recognises and welcomes the Cleaner Lewisham campaign –recommends that Mayor and Cabinet should consider the options for a new 'Lewisham in Bloom' campaign and build incentives for residents and businesses to take pride in local areas. Members also believe that this should include options for community participation – and may involve the production of new artwork or local events – and resident involvement in clean-up activities, such as the running	<p>The first phase of the Cleaner Lewisham campaign has been a success, with over 150 bags of waste collected during community clear up campaigns.</p> <p>The campaign has shown itself to be a promising platform to build on, and the suggestion of a 'Lewisham in Bloom' campaign will be explored to incentivise and encourage people to take pride in their local neighbourhood.</p>

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Theme	Recommendations of the Committee	Officer's Response
	of 'community skip' days.	<p>Officers are conscious that running campaigns concurrently can dilute core messaging and resources and considers that the Cleaner Lewisham campaign, launched in June 2021, is distinct and broad enough to encourage public participation and local pride.</p> <p>Officers note that Lewisham is the London Borough of Culture in 2022 and that this should be a focus for artwork and local events.</p> <p>It is proposed that the Cleaner Lewisham campaign remains a focus for the Council and includes waste messaging following the adoption of the Waste Strategy. Furthermore, any campaigns relating to waste and recycling should be considered against (a) the Council's waste and recycling objectives to reduce waste and promote recycling, (b) the likely cost of such campaigns noting the Council's Medium Term Financial Objectives and (c) the long term behavioural impact of such campaigns.</p>
7. The financial impact of waste	The Committee asks that in future reports on the Waste Strategy, it receive clear financial and budgetary information and future projections and targets for the delivery of the Strategy.	Officers note that clear financial and budgetary information needs to accompany the Strategy. The Council has established efficiencies in its Medium-Term Financial Plan that are to be achieved by adopting an ambitious, policy-led strategy that stimulates service transformation.

5. Recommendations

- 5.1. It is recommended that Mayor and Cabinet note the Committee's recommendations and take account of Officer responses when it considers the forthcoming Waste Strategy.

6. Financial implications

- 6.1. There are no direct financial implications associated with considering this report. Any proposals or projects arising from this paper will be detailed in future reports and will

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include the relevant financial impact.

7. Legal implications

- 7.1. The Council's Constitution sets out the procedures relating to the mayor's reports from a scrutiny committee. The Constitution sets a timescale of two months (not including recess) for a formal reply from receipt of such reports.

8. Equalities implications

- 8.1. There are no direct equalities implications arising from this report.

9. Climate change and environmental implications

- 9.1. Moving waste up the waste hierarchy by ensuring more waste is reused or recycled rather than sent for incineration or landfill contributes to the Council's efforts to mitigate the impact of climate change by reducing the carbon footprint of the Council waste management service.

10. Crime and disorder implications

- 10.1. There are no direct crime and disorder implications arising from this report.

11. Health and wellbeing implications

- 11.1. No direct health and wellbeing implications arise from this report.

12. Background papers

- 12.1. The draft Waste Strategy 2021-2031.

13. Glossary

Term	Definition
LACW	Local Authority Collected Waste
LES	London Environment Strategy

14. Report author and contact

- 14.1. Nathan Vear, Interim Head of Street Environmental Services,
nathan.vear@lewisham.gov.uk

15. Comments for and on behalf of the Executive Director for Corporate Resources

- 15.1. Shola Ojo, Principle Accountant, shola.ojo@lewisham.gov.uk, 0208 312 7778

16. Comments for and on behalf of the Director of Law, Governance and HR

- 16.1. Stephanie Fleck, Principal Lawyer, stephanie.fleck@lewisham.gov.uk, 0208 314 9968

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Sustainable Development Select Committee

Report title: Lewisham Local Plan - Regulation 19 stage “Proposed submission” document

Date: 23 November 2021

Key decision: No

Class: Part 1

Ward(s) affected: All

Contributors: Executive Director of Housing, Regeneration and Environment

Outline and recommendations

The purpose of this report is to provide Sustainable Development Select Committee (SDSC) with an update on the draft Local plan including a summary of the Regulation 18 consultation, further evidence base undertaken and the direction of travel for the Regulation 19 Stage “Proposed submission” document.

The Sustainable Development Select Committee is recommended to:

- a. Note the progress, direction of travel and suggested revisions to the Regulation 19 stage “Proposed-submission” draft Local Plan (Appendix A) and consultation summary (Appendix B)
- b. Advise officers of any matters it wishes to be considered with regard to the content of the draft Local Plan, prior to consideration by Mayor and Cabinet
- c. Note the next steps of the plan preparation process and the timetable changes
- d. Note the financial and legal implications set out in this report

Timeline of engagement and decision-making

21 st January 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Sustainable Development select Committee.
11 th March 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Mayor and Cabinet and approved for public consultation.
25 th November 2020	Lewisham Local Plan - Regulation 18 stage “main issues and preferred approaches” presented to Council and approved for public consultation.
Jan/Apr 2021	Regulation 18 stage “main issues and preferred approaches” consultation

1. Summary

- 1.1. The Local Plan sets out the long-term development strategy for the Borough and is one of the Council’s most important documents. It makes provision for new housing (prioritising genuinely affordable housing), employment and other development needs including the necessary infrastructure to support Good Growth (defined in the new London Plan as “growth that is socially and economically inclusive and environmentally sustainable”). The document sets out key policies to realise the vision for Lewisham and achieve the plans objectives ensuring that all new development delivered is of high quality. The Local Plan also has a key role in implementing the spatial aspects of the Council’s Corporate Strategy. It is focussed on tackling the causes of deprivation and impacts of inequalities, as well as responding to the climate emergency. It seeks to address the opportunities and challenges facing the borough, its communities and people, including those presented by Coronavirus (COVID-19). Despite the current uncertain circumstances brought on by the public health pandemic it will be vital to plan proactively towards a recovery, particularly for the local economy, and the local plan will play an instrumental role in this respect.
- 1.2. A new local plan is being prepared to ensure there is an up-to-date plan in place for the borough, and to reflect national and London Plan policy changes that have emerged in recent years. A new local plan is vital for the Council to be a strong position to maintain control of local planning decisions, and to ensure these decisions are made in the best interests of Lewisham’s neighbourhoods, communities and people.
- 1.3. Following approval by Council on the 25th November 2020, public consultation was held on Lewisham’s draft Local Plan - Regulation 18 stage “main issues

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and preferred approaches” which ran from 11th January to the 15th April 2021. The consultation process had substantial engagement from local residents and stakeholders, receiving 1,432 responses comprising of several thousand comments. This represents a very successful Local Plan response rate when compared to other Local Plan consultations in London, both during the COVID pandemic and before. Lewisham’s previous Local Plan consultation at Regulation 18 stage “main issues and options” which ran from 9th October to 20th November 2015 received 70 responses.

- 1.4. The responses have been considered by officers and the plan amended where appropriate. The consultation has also led to a number of updates and/or additional evidence base documents being carried out in way of response. These include: an update to the retail study; an update to the MOL review; an open space review and an update to the tall building study. Further detail can be found Section 8.
- 1.5. The process outlined above has fed into a revised Lewisham Local Plan - Regulation 19 stage “Proposed-submission” document and associated appendices.
- 1.6. In line with national regulations the Council will seek representations through a consultation process on the Regulation 19 stage “Proposed-submission” document and associated appendices. This consultation specifically focuses on whether the “proposed-submission” version of the Local Plan is ‘sound’ based upon the criteria set out in the National Planning Policy Framework (NPPF). Namely whether the plan has been **positively prepared**, is **justified, effective** and is **consistent with higher level policy**. This consultation will be carried out in accordance with our adopted Statement of Community Involvement (2020). For further details see Section 9.
- 1.7. The purpose of this report is to provide Sustainable Development Select Committee (SDSC) with an update on the draft Local plan including a summary of the Regulation 18 consultation, further evidence base undertaken and the direction of travel for the Regulation 19 stage “Pre-Submission” document.

2. Recommendations

- 2.1. The Sustainable Development Select Committee is recommended to:
 - a. Note the progress, direction of travel and suggested revisions to the Regulation 19 stage “Proposed-submission” draft Local Plan (Appendix A) and consultation summary (Appendix B)
 - b. Advise officers of any matters it wishes to be considered with regard to the content of the draft Local Plan, prior to consideration by Mayor and Cabinet
 - c. Note the next steps of the plan preparation process and the timetable changes
 - d. Note the financial and legal implications set out in this report

3. Policy Context

National Planning Policy Framework (NPPF)

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- 3.1. When preparing a new Local Plan the National Planning Policy Framework (NPPF) (revised July 2021) must be taken into account. The NPPF sets out the Government's planning policies for England and how these are expected to be applied.
- 3.2. Paragraphs 15-16 of the NPPF outlines the expectations and requirements for local authorities in preparing a new Local Plan. Specifically, local authorities need to ensure that new plans are succinct and up-to-date, provide a positive vision for the future, and present a framework for addressing housing need and other economic, social and environmental priorities. Local authorities also need to ensure that plans be prepared with the objective of contributing to the achievement of sustainable development, and are shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.
- 3.3. Paragraphs 24-27 of the NPPF further outlines the requirements for local planning authorities to ensure that their plan addresses the relevant strategic matters that have broader spatial implications that cross administrative boundaries ("duty to co-operate"), and that effective and on-going joint working between strategic policy-making authorities and statutory bodies has taken place to inform the relevant strategic policies in the new Plan.
- 3.4. Local plans are also required to be reviewed at least once every five years, and updated as necessary (Paragraph 33), and ensure that the existing strategic policies can provide a sufficient supply of new homes over a minimum five year period (Paragraph 73-76). Given that Lewisham's current Core Strategy was published in 2011, and sites allocated for development in the Strategy have largely been taken up or built out, Council is obliged at this time to prepare a new Local Plan to meet the requirements of Paragraph 33 and 73-76 of the NPPF.
- 3.5. Further, the new Local Plan needs to comply with the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended ("the Regulations"). Regulation 19 outlines the steps that must be undertaken in this stage, including the need for consultation, who needs to be notified, and how a local authority should consider feedback received during this public consultation before submitting a local plan to the Secretary of State for a public examination.

Lewisham's Corporate Strategy 2019

- 3.6. The Local Plan sets out the long-term development strategy for the Borough and is one of the Council's most important strategies. It makes provision for new housing, employment and other development needs including infrastructure. It has a key role in implementing the spatial aspects of the Council's Corporate Strategy including:
 - Open Lewisham - Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.
 - Tackling the housing crisis - Everyone has a decent home that is secure and affordable.
 - Building an inclusive local economy - Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.

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- Making Lewisham greener - Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.
- Building safer communities - Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

4. Background

- 4.1. The Local Plan is the main development plan document for LB Lewisham, setting out a vision and strategy for future development of the borough, addressing the needs and opportunities in relation to housing, the economy, community facilities and infrastructure, as well as providing detailed policies for managing growth and change, safeguarding the environment, meeting the challenge of climate change, securing high quality design in developments, and identifying specific proposals for the use of land in the borough.
- 4.2. The Local Plan also has an important role in translating any corporate strategy into a spatial vision for the borough, along with guidance to assist in delivering that vision.

Reasons for a new Local Plan

- 4.3. The Council has a statutory duty to review its Local Plan every 5 years in order to ensure it is up-to-date (i.e. consistent with the London Plan and national planning policy). There are significant risks to the Council should it not have an up-to-date plan in place, as discussed under the 'Risk management' subheading below. Notwithstanding these risks, however, is the urgent need to tackle the causes of deprivation within the borough and the impacts of inequality. The Council's latest research shows that while progress has been made, many parts of the borough remain in the 20 per cent most deprived in the country. There is an acute and rising need for genuinely affordable housing locally and Lewisham's economy is one of London's smallest, limiting opportunities for jobs and training. Furthermore, there is now a growing body of evidence showing the adverse economic impacts of COVID-19; and that the pandemic is disproportionately affecting those in areas of deprivation, particularly BAME groups. As well, addressing the climate emergency is imperative as the greatest impacts of climate change will be on the most vulnerable and those least able to protect themselves. The new Local Plan is a timely opportunity to address these issues, including by supporting the wider corporate response to COVID-19 and a recovery from it.
- 4.4. The current Local Plan has helped the Council to secure and deliver significant investment in homes, jobs and infrastructure. Most of the key strategic sites identified by the Plan for development now have planning permission or have started/completed build out. A new overarching strategy is therefore required to ensure that current and future local needs, such as for housing and employment floorspace, can be accommodated in appropriate locations. For sustainable community development it is vital that such needs are met in a coordinated rather than piecemeal manner.
- 4.5. Furthermore, the Local Plan is required to be in line with national and regional planning policy. Crucially, there have been significant changes in this higher

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level policy landscape since the Core Strategy was adopted in 2011. The new National Planning Policy Framework (NPPF) and its associated guidance were first published in July 2018 with subsequent revisions in 2019 and 2020. The most recent revision was published in July 2021.

- 4.6. In addition, a new London Plan, came into force in March 2021. The London Plan 2021 is the Spatial Development Strategy for Greater London and forms part of Lewisham's Development Plan Documents. The London Plan sets out a framework for how London will develop over the next 20-25 years and the London Mayors vision for Good Growth.
- 4.7. The new London Plan provides for a 20% increase on the current annual housing target for Lewisham, rising from 1,385 to 1,667 net units.
- 4.8. The new Local Plan provides a timely opportunity to reconsider the borough's overall development strategy in light of the aforementioned issues and policy changes, particularly in a manner that confidently aligns with the latest corporate strategy and key priorities across the council.

Risk management

- 4.9. In the absence of an up-to-date Local Plan that aligns with the latest NPPF and London Plan, it will become increasingly difficult to influence and determine development proposals which fail to deliver positive outcomes for Lewisham. The National Planning Policy Framework (NPPF) clearly states, at paragraph 11, that where there are no development plan policies, or the policies which are most important for determining an application are out-of-date, the council must grant planning permission (unless very limited exceptional circumstances apply). By not updating its Local Plan, the council would effectively render a number of policies out-of-date and significantly compromise its ability to make planning decisions based on local circumstances.
- 4.10. Further compounding the above risk is the new Housing Delivery Test (HDT) introduced by the NPPF (2019). The HDT sets punitive measures for local authorities who are not meeting their housing targets, including the imposition of the 'presumption in favour of sustainable development' in line with NPPF, paragraph 11, discussed above. Furthermore, the 'presumption' will continue to apply where the council is unable to demonstrate a five year housing land supply (5YHLS) of deliverable sites against its housing target, at any given time. Developers are increasingly challenging authorities on the 5YHLS through the planning appeal process.
- 4.11. In summary, in the absence of an up-to-date Local Plan (which provides a sufficient supply of development sites to ensure delivery against Lewisham's new higher housing targets), the council is at risk of having punitive measures imposed on it, and is more likely to experience 'planning by appeal' on a regular basis.

5. How the plan is being prepared

Key stages

- 5.1. 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

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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.

Timetable / Local Development Scheme

- 5.2. The timetable for preparing the Local Plan was set out in the council's adopted Local Development Scheme (LDS) approved by Mayor and Cabinet in December 2020.
- 5.3. The updated LDS amended the trajectory for completing the Regulation 18 stage of consultation for the following reasons:
 - Following Council's approval of the draft Local Plan on 25 November 2020, a short pause required before commencing the public consultation to ensure this did not coincide with the winter holiday period.
 - In order to ensure the public had a good opportunity to consider and feedback on the local plan proposals and for officers to run a series of online information sessions, the consultation was programmed to run for more than 11-weeks (almost twice the statutory 6-week minimum).
- 5.4. Since then the programme for preparing the Local Plan has been delayed for a number of reasons, namely:
 - The success of the Regulation 18 consultation with 1,432 responses comprising of several thousand comments has meant that the Council's small policy team has had to spend longer than anticipated in its review and response.
 - The Regulation 18 consultation has also led to a number of updates and/or additional evidence base documents being carried out in way of responding to the most prominent issues arising from the consultation, which are critical to the plan's soundness, including: an update to the retail study; an update to the MOL review; an open space review and an update to the tall building study.
 - Whilst not a statutory requirement the programme has also been delayed to incorporate a number of BAME workshops to increase participation in the Local Plan process.
 - In light of the above, when reviewing the confirmation of the committee calendar in September 2021 it was apparent that it would not be possible to hold the 6 week consultation prior to the pre-election period for the local elections on 5th May.
- 5.5. As such officers are seeking to revise the LDS due to be considered by Mayor and Cabinet early 2022. The table below sets out the key stages of the plan making process, the anticipated programme and highlights the current stage of production. Officers will seek formal approval for the Council to adopt a revised LDS, prior to the commencement of the next round of statutory public consultation on the plan. It is a legal requirement that the Local Plan is prepared in accordance with an up-to-date LDS, and this will be tested at the plan's examination.

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Key stage	Timescale
Consultation on the Main Issues (Regulation 18)	October – November 2015
Pre-production (with community and stakeholder engagement). (This includes consultation on ‘Call for Sites’ exercises, landowner surveys and public engagement on the preparation of evidence base documents, including area-based strategies.)	Spring 2018 - November 2020
Consultation on the Main Issues and Preferred Approaches document (Regulation 18)	Jan - April 2021
Publication of the draft Local Plan, ‘proposed submission version’ (Regulation 19)	Spring – Summer 2022
Submission to the Secretary of State and Examination in Public (Regulations 22-25)	Winter 2022/2023
Adoption by Council (Regulation 26)	Summer – Autumn 2023

Evidence base

- 5.6. The Local Plan has to be underpinned by a robust evidence base to justify the policy approaches. 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.
- 5.7. Our evidence base comprises technical studies, research reports, site and area masterplans, an Integrated Impact Assessment and other information covering

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a variety of topic areas and local issues, including: design, housing, economy, environment, transport and infrastructure. A number of the evidence base documents informing the Local Plan have been prepared through engagement with community groups and other stakeholders. This includes the New Cross Area Framework, Catford Town Centre Framework and Lewisham Characterisation Study. The evidence base documents have been made publically available on the Council's website and form part of the Local Plan library. All evidence base documents will be made available in time for the consultation.

Integrated Impact Assessment

- 5.8. 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)
- 5.9. 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.
- 5.10. An interim IIA was published for public consultation concurrently with the draft Local Plan "main issues and preferred approaches document". A final IIA report will be prepared and published at the next Regulation 19 stage of public consultation. This will take into account feedback received from statutory consultees and the wider public, along with any changes made to the Local Plan.
- 5.11. 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. A draft HRA was published at the Regulation 18 stage of consultation. As with the IIA, the HRA will be reviewed and updated where necessary.

Infrastructure Delivery Plan

- 5.12. Lewisham's Infrastructure Delivery Plan (IDP) has been prepared as a companion document to the Local Plan. It sets out what infrastructure is required to support planned growth identified in the Local Plan. The Council, its partners and other stakeholders will use the document to ensure that the appropriate infrastructure is in place as growth is delivered.
- 5.13. The infrastructure identified in the IDP, should be deliverable within the Plan period (2020-40) and includes details of where funding for this infrastructure will be sourced (where known). The draft IDP has been informed through early and ongoing engagement with internal and external stakeholders across a range of

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service areas.

- 5.14. The draft IDP was subject to public consultation undertaken concurrently with the Regulation 18 stage “main issues and preferred approaches” consultation on the local plan.
- 5.15. The IDP is being reviewed to consider representation from this consultation and to reflect amended GLA population projections published in 2020. The population projections take into account external factors such as the impacts from Brexit and the COVID-19 pandemic. It should be noted that the variance in the figures between the 2020 population projections and the 2018 projections, used to inform the previous draft of the IDP are very minor. The 2020 projections still indicate strong population growth for London and for Lewisham over the Local Plan period 2020 – 2040. Given the minor variance in population projections there is unlikely to be any significant changes in the IDP arising from this matter. Nevertheless we have and are continuing to engage with our infrastructure delivery partners to understand whether there will be any changes to the IDP resulting from the revised population figures and/or other factors. This has been factored into the revised IDP.
- 5.16. The IDP will continue to be reviewed and updated on a regular basis, and will be treated as a ‘live’ document that will evolve over time. It will respond to the latest available information from the Council and its delivery partners on project programming and financing, indicate when strategic infrastructure has been delivered, and reflect changes in the expected level of provision required. The IDP will also be used to inform decisions on infrastructure delivery, for example the allocation of CIL receipts to projects. The IDP can also be used as supporting evidence in bids for external funding and to support proposals for specific sites to be protected for use as schools or other infrastructure required throughout the plan period.

Tests of soundness

- 5.17. 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.

Tests of soundness for local plans (NPPF, paragraph 35).	
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

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	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.

Member briefings

- 5.18. In order to ensure that Members have been engaged throughout the plan process and have had the opportunity to influence its direction, the Strategic Planning Team has facilitated a series of All Members Briefings. To-date, 5 sessions have been held, with two in July 2018, and one in each of October 2018, July 2019 and February 2020 respectively.
- 5.19. The first session (July 2018) focused on the plan making process and some of the key challenges and opportunities arising through the plan review.
- 5.20. The second sessions (July 2018) set out the 'direction of travel' on the new plan and potential broad strategic options for the spatial strategy.
- 5.21. The third session (Oct 2018) agreed the 'strategic objectives' for the new Local Plan with members and outlined the emerging spatial strategy for the borough. The 'strategic objectives' will frame the strategy and detailed policies for the plan, and will ultimately help to ensure that the plan helps give effect to the new corporate strategy.
- 5.22. At the fourth session (July 2019), officers presented an overview of the draft development management policies and the draft site portfolio:
- The Development Management policies cover the detailed requirements and standards we would expect all new development to comply with. These policies cover a wide range of topic areas including housing, employment land, town centres, open space and climate change resilience.
 - The draft site portfolio contains the emerging portfolio of strategic development sites. These sites are being considered for inclusion as site allocation policies in the new plan. The sites will help us to meet our future housing, employment, and town centre/retail targets, along with other local needs, and safeguard land for strategic infrastructure, such as for transport.
- 5.23. A package of Local Plan documents covering the above was circulated to all members before and after the session in July 2019 for comments, feedback and/or clarifications. This member's consultation period ran between 12 July 2019 to 18 December 2019.
- 5.24. The fifth and most recent session (February 2020) focussed on the proposed 'Vision for Lewisham' along with the supporting visions and key priorities for the borough's five character areas, which together provide a key focus for the Local

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Plan. Discussions were focussed around three key questions.

- What are the key opportunities to improve your local area?
- Does the draft Local Plan capture the main strategic priorities for your local area?
- What should the future vision for the character area reflect?

5.25. Feedback from all of the Member briefings has been used to inform the preparation of the Local Plan. Officers expect to continue engaging with Members throughout the course of the Local Plan's production, both through briefings and more formally through the Key Decision process.

Strategic Planning Committee (SPC) briefing

5.26. On the request of SPC, officers held a Local Plan session to update members on the preparation of the plan on 20th October 2021. The purpose of this session was to discuss with SPC which includes the chairs of planning committee A, B and C, key policy areas which are of particular interest when making committee decisions. The policies included: Optimising site capacity; Building heights; Amenity and agent of change; Affordable housing; Purpose built student housing; Culture and the night-time economy; Green infrastructure and; Sustainable design and Parking. The results of this session have fed into the drafting of the Regulation 19 stage Local Plan document.

6. Local Plan Contents

Scope of the Draft Local Plan

6.1. Lewisham's current, adopted Local Plan consists of a package of documents. These form the Council's statutory development plan, alongside the London Plan and any future neighbourhood plans prepared by community groups. Currently, the Local Plan includes:

- The Core Strategy (2011)
- Site Allocations (2013)
- Development Management policies (2014) and
- Lewisham Town Centre local plan (2014).

6.2. The Draft Local Plan brings these documents into a single, updated plan.

Structure of the Draft Local Plan

6.3. 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.

6.4. 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.

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

7. Regulation 18 “main issues and preferred approaches” Public consultation

- 7.1. Following approval by Council on the 25th November 2020, public consultation was held on Lewisham’s draft Local Plan - Regulation 18 stage “main issues and preferred approaches” which ran from 11th January to the 15th April 2021.
- 7.2. The consultation process for planning policy documents such as the Local Plan is set out in the Statement of Community Involvement (SCI). The SCI is a document which sets out how and when the council will consult with and involve the community and other stakeholders in planning matters including in the preparation of Lewisham’s development plan, its supporting documents and in the planning application process. The Council is required by law to have an adopted SCI. The Regulation 18 consultation was held in accordance with Lewisham’s Addendum to the SCI adopted in December 2020.
- 7.3. The consultation included:
 - Publication of the Regulation 18 stage Local Plan and supporting documents for an 11 week public consultation period supported through the online platform commonplace and the councils own consultation platform Citizen Space. This exceeded the minimum 6-week period stated in the SCI.
 - A summary document of the Local Plan which provided a short, graphically engaging, non-technical overview as a useful tool to raise awareness of the consultation and to draw people to the main consultation document.
 - 16 virtual ‘town hall’ events on all key policy area and sub area sections of the plan. These events provided an opportunity for council officers to present and hold informal Q&A sessions with members of the public and stakeholders. All sessions were recorded and uploaded to Commonplace platform. All slide decks and Q&A sheets of those questions not answered on the night were also uploaded to the platform

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7.4. The consultation was publicised through the following means:

- Emails were sent out to all registered consultees including neighbourhood forums, amenity and heritage societies informing them of the consultation.
- Letters were sent, where possible to all landowners and leaseholders of draft Site allocations within the plan.
- Site notifications were displayed in and around draft site allocations identified within the plan.
- Advertisements were placed in local newspapers, Lewisham Life and the News Shopper.
- The Council's social media platforms were utilised.
- Consultation hosted on the council's Citizen Space platform. A dedicated consultation website was also set up on the Commonplace platform - this is a more interactive tool and allowed for periodic 'news updates' to be circulated to registered users.

7.5. The consultation process had substantial engagement from local residents, community groups, business, and stakeholders, receiving 1,432 responses comprising of several thousand comments. This represents a very successful Local Plan response rate when compared to other London borough's Local Plan consultations both during the COVID pandemic and before. The consultation responses included:

Commonplace main site

- Visitors 13,001
- Respondents 937
- Agreements with comments 2,307

Commonplace interactive map

- Visitors 1,870
- Comments 577
- Agreements on specific comments 2,061

Local Plan inbox – written representation

- Respondents 450

Online "town hall" events

- Total attendance 492

7.6. A targeted outreach strategy for 'seldom heard' communities was developed in partnership with the communication consultants and Council officers. As part of this strategy a contact list of 219 key 'seldom heard' led organisations within the borough was identified, with officers frequently e-mailing the organisations encouraging their support in promoting the consultation to their wider network as well as encouraging members of the organisations to attend the consultation events and comment on the Local Plan consultation. A package of promotional documents that included character area summaries, character area graphics, links to the commonplace site and how to get involved in the consultation would

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also sent to the 'seldom heard' organisations to assist them in promoting the consultation through their social media accounts, e-mail contact lists and any virtual newsletters the groups would publish and circulate during the consultation period.

- 7.7. A summary of the key themes derived from the consultation responses and how officers have responded is provided in Appendix B

8. Update on evidence base documents and additional work ongoing

Voices for Lewisham review

- 8.1. Whilst it cannot be considered as part of the statutory consultation process of the Local Plan, officers are acutely aware of the importance of the feedback from the Voices of Lewisham work undertaken by the Council during the COVID-19 Pandemic. A key thread from this work was economic recovery, the creation and investment in new local jobs, community space and housing. Officers are continuing to review this work and strengthening the plan where appropriate.

BAME Workshops

- 8.2. Since the consultation data has been collated officers have been analysing the range of responses. Analysis of those who provided details on age and ethnicity suggest that the consultation responses represent a wide range of age groups. However, BAME residents, who make up 48.3% of the Lewisham population, were underrepresented within the consultation process. Only 3% of respondents providing details on ethnicity were from BAME backgrounds.
- 8.3. In response to this, officers are planning to hold a series of targeted workshops with representatives from Lewisham's BAME community and refugees to discuss growth and change in Lewisham.
- 8.4. The aim of these workshops is to: (a) increase BAME participation within the consultation process; (b) complement the wider online consultation; and (c) get a more qualitative in-depth idea of needs, priorities, and the perceptions of societal groups who were underrepresented in the initial consultation.
- 8.5. We anticipate these workshops will be held through Nov/Dec and will then feed into the Regulation 19 version of the draft Local Plan.

Retail Impact Assessment

- 8.6. Following considerable representation on the issue of retail demand and the changing nature of our town centres the council appointed Lichfields to update the Local Plan evidence base to consider the following:
- How changes to the NPPF, NPPG, the adoption of the London Plan, recent changes to the Use Class Order and permitted development rights (PDR) would impact the plan.
 - How updated market trends including the recent impacts of COVID-19 and rise in online shopping would impact on the plans Retail Capacity Study.
 - How the proposed changes to out-of-town retail parks and single storey large retail stores could impact on the displacement or growth and shift in town centre uses.

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- Whether the proposed designation of a town centre at Bell Green/Lower Sydenham would have any impact on existing neighbouring centres.

Update to SHMA

- Fundamental changes in national and regional planning policy and practice have taken place since the original 2019 SHMA report was prepared which requires updating including:
 - The adoption of the London Plan with a lower housing target of 1,667 p.a. for Lewisham means there is a need to re-calculate the boroughs capped Local Housing Need (LHN). With a revised LHN, there is a specific need to reassess the findings and recommendations of the 2019 SHMA.
 - Assessing the impact that the governments First Homes policy will have on Lewisham and specifically the impact on the delivery of affordable homes.
 - Reconsidering the need for different types of housing for specific groups, including purpose built student accommodation, supported housing, multi-generational housing and others.

Open space review

- 8.7. A large number of responses to the consultation focussed around open space, particularly green spaces, citing a lack of consistency in the Regulation 18 draft plans designations, proposing additional spaces for stronger protection and a desire for more clarity on the hierarchy of designations and protections proposed. In response to these comments the council have commissioned a further open space review. This additional review will build on the Open Space Assessment 2019 and consider four broad areas relating to responses received, namely:
- Undertake a review of the boroughs open spaces to rectify any inconsistencies in the draft Local Plans categorisation of typologies and capture any omitted spaces.
 - Establish a hierarchy of open space designations underpinned by robust criteria.
 - Review specific open space boundaries outside of MOL where appropriate, so they are tightly drawn, accurate reflecting the spatial extent of the open space.
 - Provide a limited review of SINC boundaries in line with policy G6 of the London Plan.

Metropolitan Open Land (MOL) update

- 8.8. Aligned to the above the Council has commissioned an update to the Metropolitan Open Land Review (MOL) (2020). The purpose of this work is to assess additional sites for MOL designation in response to Regulation 18 consultation feedback on the local plan as well as sites forming part of the All London Green Grid (London's network of green infrastructure) and other strategic green corridors.

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Tall building study update

- 8.9. In response to representations the Council has commissioned an update of the Tall Building Study to ensure the plan is sound, and also to provide additional clarity for the public and developers on the suitability and threshold heights of tall buildings within Lewisham.

9. Next Step – Regulation 19 “proposed-submission” consultation

- 9.1. Subject to all the necessary approvals the Regulation 19 stage “proposed-submission” document will be published for a six week consultation due to commence on the 6th May in accordance with the Town and Country (Local Planning) (England) Regulations 2012 and in line with Lewisham’s adopted SCI. Holding the consultation in May/June will ensure that it falls outside the Pre-election Period for Lewisham’s local elections which will run four weeks prior to the 5th May election date.
- 9.2. Section 20(2)(b) and 5(b) of the Planning and Compulsory Purchase Act 2004 require that the plan which a local authority submits for examination is one that it considers to be ‘Sound’. The NPPF paragraph 35 sets out the ‘test of soundness’ against which a plan will be tested - see paragraph 5.17 of this report for further information.
- 9.3. The key purpose of the Regulation 19 consultation stage is to allow the public and stakeholders the opportunity to make representations on the ‘soundness’ of the Local Plan and matters of ‘legal compliance’ (i.e. whether the Council has following the appropriate procedures during the preparation of the plan). All representations made will be considered by a Planning Inspector appointed to independently examine the Local Plan, currently scheduled to commence in Winter 2022/2023. Ahead of the submission of the Local Plan for examination, the Council’s ability to respond to representations made through the consultation is more limited than at the Regulation 18 consultation stages. Indeed, whilst the council will be able to agree minor modifications to the Local Plan ahead of submission this does not extend to making more significant changes, such as the inclusion of an additional site allocation for example.
- 9.4. If the council wishes to make changes to the publication (Regulation 19) Local Plan prior to submitting it for examination, it can include any changes in an addendum to the plan. Where the Council intends the changes to be treated as part of the submitted plan, the addendum, together with any necessary sustainability appraisal of it, should be subject to further consultation (equivalent to the consultation on the publication version) before submission. Where such consultation has not taken place, the proposed changes will be considered by the Inspector during the examination process, but will not be treated as part of the submitted plan.
- 9.5. In short, the council does have the ability to propose significant changes to the Local Plan as long as these are subject to a period of consultation through a further Regulation 19 consultation exercise. The risk to the Council in this scenario is a further delay to the preparation of the Local Plan and this in turn increases the risks identified in Section 4.

Consultation Strategy

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- 9.6. The Regulation 19 consultation will be held in accordance with Lewisham's Addendum to the SCI adopted in December 2020.
- 9.7. The Regulation 19 stage "pre-submission" document will be published online and hard copy documentation will be made available in local libraries (subject to COVID-19 restrictions). The main methods of submitting representations will be online, but email and hardcopy responses can also be submitted.
- 9.8. The council will ensure that the consultation period is well publicised through a range of media including online, local newspaper adverts and other publications where appropriate.
- 9.9. Given the limited scope and technical nature of this stage of consultation we will not be holding workshops or virtual town hall sessions.

10. Financial implications

- 10.1. There are no direct financial implications arising from approving the consultation and noting the documents relating to it.
- 10.2. The costs involved in the consultation process, as well as the costs to proceed the Local Plan through the Reg 19 stage to the end of this financial year will be contained within existing budgets.

11. Legal implications

- 11.1. The Planning and Compulsory Purchase 2004 (as amended) ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the 2012 Regulations") set out the requirements and the statutory procedure for the preparation of a Local Plan. Details of the particular requirements are set out in the body of the report.
- 11.2. The approval of proposals for public consultation in connection with the production, alteration or withdrawal of development plan documents which includes the Local Plan is a matter reserved to full Council.
- 11.3. Regulation 19 of the 2012 Regulations states that Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must (a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and (b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).
- 11.4. The Equality Act 2010 (the Act) introduced a public sector equality duty (the equality duty or the duty). It covers the following protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 11.5. In summary, the Council must, in the exercise of its functions, have due regard

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to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

11.6. It is not an absolute requirement to eliminate unlawful discrimination, harassment, victimisation or other prohibited conduct, or to promote equality of opportunity or foster good relations between persons who share a protected characteristic and those who do not. It is a duty to have due regard to the need to achieve the goals listed at 11.5 above.

11.7. The weight to be attached to the duty will be dependent on the nature of the decision and the circumstances in which it is made. This is a matter for the Mayor, bearing in mind the issues of relevance and proportionality. The Mayor must understand the impact or likely impact of the decision on those with protected characteristics who are potentially affected by the decision. The extent of the duty will necessarily vary from case to case and due regard is such regard as is appropriate in all the circumstances.

11.8. The Equality and Human Rights Commission has issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at:

- <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-codes-practice>
- <https://www.equalityhumanrights.com/en/advice-and-guidance/equality-act-technical-guidance>

11.9. The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:

- The essential guide to the public sector equality duty
- Meeting the equality duty in policy and decision-making
- Engagement and the equality duty: A guide for public authorities
- Objectives and the equality duty. A guide for public authorities
- Equality Information and the Equality Duty: A Guide for Public Authorities

11.10. The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that

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are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:

- <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

12. Equalities implications

- 12.1. The Council's Comprehensive Equality Scheme for 2016-20 provides an overarching framework and focus for the Council's work on equalities and helps ensure compliance with the Equality Act 2010.
- 12.2. The preparation of the Local Plan is being informed by an Integrated Impact Assessment which includes an Equalities Impact Assessment.
- 12.3. Publishing the draft Local Plan at this stage will allow stakeholder/resident views on the content of the document and any likely adverse impacts of policies and proposals on equality groups to be identified and carefully considered prior to the preparation of the final plan document. The proposed submission version of the plan (at Regulation 19 stage) will be supported by an Integrated Impact Assessment (IIA), which will test at a detailed level all policies and proposals of the plan for equality impacts.

13. Climate change and environmental implications

- 13.1. Lewisham council is one of the first local authorities in the UK to declare a climate emergency. 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. 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. 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.
- 13.2. 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 adaption 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 and reflect the complexity of matters that must be taken into account when planning positively for climate change resilience.

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14. Crime and disorder implications

- 14.1. There are no direct crime and disorder implications arising from this report.

15. Health and wellbeing implications

- 15.1. The production of the Local Plan documents may have health and wellbeing implications. These will be considered during the plan-making process for Local Plan documents through the preparation of Integrated Impact Assessments. These consolidate different types of assessment into a single process, including Strategic Environmental Assessment, Sustainability Appraisal, Equality Impact Assessment (EqIA) and Health Impact Assessment.

16. Background papers

- 16.1. Report to Mayor and Cabinet 11th March 2020.
<https://councilmeetings.lewisham.gov.uk/ieListDocuments.aspx?CId=139&MIId=5696&Ver=4>
- 16.2. Report to Council 25th November 2020.
<https://councilmeetings.lewisham.gov.uk/documents/s76130/Approval%20of%20the%20draft%20Local%20Plan%20for%20public%20consultation.pdf>
- 16.3. Lewisham's existing adopted Local Development Framework.
<https://lewisham.gov.uk/myservices/planning/policy/ldf> Which includes:
- Core Strategy 2011
 - Development Management Local Plan 2014
 - Site Allocations Local Plan 2013
 - Lewisham Town Centre Local Plan 2014
- 16.4. The current adopted London Plan 2021. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>
- 16.5. The intend to publish London Plan 2019. <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019>
- 16.6. National Planning Policy Framework 2019.
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 16.7. Lewisham Local Plan Regulation 18 Stage “main issues and preferred approaches” document.
<https://lewisham.gov.uk/myservices/planning/policy/planning/about-the-lewisham-local-plan>
- 16.8. Lewisham draft Local Plan website including access to all evidence base documents. [https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/evidence-base`](https://lewisham.gov.uk/myservices/planning/policy/adopted-local-plan/evidence-base)

17. Report author and contact

- 17.1. David Syme

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Head of Strategic Planning

Email – David.syme@lewisham.gov.uk

18. Comments for and on behalf of the Executive Director for Corporate Resources

18.1. Shola Ojo – Principal Accountant, Financial Services
(shola.ojo@lewisham.gov.uk)

19. Comments for and on behalf of the Director of Law, Governance and HR

19.1. Paula Young – Senior Lawyer, Legal Services (paula.young@lewisham.gov.uk)

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INFORMATIVE

This is an emerging draft of the Lewisham Local Plan “Proposed Submission Document” (Regulation 19 stage). It has been prepared for consideration by the Council’s Sustainable Development Select Committee.

This draft document should not be used for the purpose of decisions on planning applications.

READING THIS DOCUMENT

This draft document is presented in ‘track-change’ mode. It shows changes that are proposed to be made to the Local Plan: Main Issues and Preferred Approaches Document (Regulation 18 stage). These changes have been informed by public consultation feedback, new technical evidence, the London Plan (2021) and the revised National Planning Policy Framework (July 2021).

The document is best viewed in colour as the changes are shown as follows:

Additions in blue underline.

~~Deletions in red strikethrough.~~

Text that is retained but moved elsewhere in green underline.

Planning policy comments highlighted in ledger note main reasons for changes

Lewisham Local Plan

Regulation 19 – Proposed submission document

(Text only version excluding Part Three - Site Allocations)

0

Consultation overview

The **Lewisham Local Plan: Main Issues and Preferred Approaches** document is being consulted upon under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

The new Local Plan will establish a future vision for Lewisham, along with the planning and investment framework to deliver this vision over a 20-year period (2020 to 2040). The Local Plan, together with the London Plan and Neighbourhood Plans, forms the statutory Development Plan for Lewisham.

This document sets out the Council's 'preferred approaches' for the overarching spatial strategy as well matters covering a range of policy topic areas, having considered the reasonable alternatives. Where there are reasonable alternatives that have been considered, these are identified within the document. The document sets out the justification for selecting the preferred approaches at this time.

Next Steps

Comments on the **Lewisham Local Plan: Main Issues and Preferred Approaches** are invited from all those with an interest in the borough.

The Council is also inviting comments on a number of supporting documents which have been prepared to support the Local Plan, as follows: Schedule of Proposed Changes to the adopted Policies Map; Integrated Impact Assessment; Habitats Regulations Assessment; Draft Infrastructure Delivery Plan.

All comments received will be taken into account and will inform the 'Proposed Submission' version of the Local Plan, which will be published for public consultation (Regulation 19 stage). In addition, all comments will be summarised and collated within a Consultation Statement. Respondents will be identifiable by name. Any other personal information will be processed in accordance with the General Data Protection Regulations 2018.

Consultation documents and supporting information can be accessed and viewed online, by visiting <https://lewishamlocalplan.commonplace.is> or <https://consultation.lewisham.gov.uk/planning/localplanconsultation>.

When and how to respond

This public consultation on the **Lewisham Local Plan: Main Issues and Preferred Approaches** document will run from **15 January 2021** to **11 April 2021**.

Comments must be received no later than **11 April 2021**.

The Council encourages the use of our online consultation portals <https://lewishamlocalplan.commonplace.is> and <https://consultation.lewisham.gov.uk/planning/localplanconsultation>.

This will enable the Council to better process and acknowledge your feedback.

Written representations can also be submitted by:

Email

localplan@lewisham.gov.uk

Post

Local Plan

Lewisham Planning Policy

London Borough of Lewisham

Laurence House

1 Catford Rd, Catford, London SE6 4RU

Commented [NE1]: Consultation information to be updated for Regulation 19 plan

0 Consultation information – To be completed

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

Commented [NE2]: Preamble deleted – this statement is the Vision for Lewisham, which is included later within Part 1 of the plan

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Part One:

Planning for an Open Lewisham

1

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 and deliver sustainable development in a way that respects the distinctive character and diversity of the Borough. The plan will help to ensure that investment decisions meet the respond to the needs and aspirations of our local communities and contribute to sustaining and creating and contribute to inclusive, safe, healthy and liveable neighbourhoods.
- 1.3. The ~~Mayor of London recently introduced the~~ concept of 'Good Growth' underpinning underpins the new draft London Plan (2021). Good Growth is growth that is socially and economically inclusive and environmentally sustainable.¹ 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 is 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 and ensuring equality of opportunity. Through our unique ways of working, known as the 'Lewisham Way', we will work alongside public and private sector stakeholders, local communities and community groups and as well as local residents to deliver realise the Local Plan objectives, guided by the aim of delivering prosperous communities and achieving better outcomes for all so that everyone in Lewisham can enjoy a good quality of life.

Commented [NE3]: Removed to make more concise

Commented [NE4]: Amended for clarity

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

¹ The London Plan, Intend to Publish Version (December, 2019), paragraph 0.0.18

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~~2021) 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 National 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.

~~1.8. A new London Plan has been prepared by the London Mayor to replace the London Plan (March 2016), although it does not yet carry full material weight.² Where reference is made to the 'draft London Plan' in this document, this means the Intend to Publish Version (December 2019).~~

Commented [NE5]: Factual update – London Plan now adopted

Lewisham's development plan

~~1.9-1.8.~~ 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.³ The diagram below illustrates how the Local Plan and its supporting documents sit within the wider planning framework.

Figure 1.1: The planning policy hierarchy

Lewisham's new Local Plan 2020-2040

~~1.10-1.9.~~ Once adopted, Lewisham's new Local Plan 2020-2040 will replace ~~the Council's current suite of development plan documents, bringing the updated policies together into a single plan.~~⁴ the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014) and Lewisham Town Centre Local Plan (2014).

~~1.11. We are producing a new Local Plan to:~~

² The new London Plan has been subject to an Examination in Public led by independent inspectors appointed by the Secretary of State. At this time, outcomes of the examination process are pending, and the new London Plan does not therefore carry full material weight.

³ Planning and Compulsory Purchase Act 2004, Section 28 (6).

⁴ 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 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.
- Respond to the **climate emergency**—in February 2019 the Council declared a climate emergency.⁵ 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.⁶
- 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 accommodate and promote Good Growth. 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

⁵ London Borough of Lewisham. Meeting of Council on 27 February 2019. Motion 2 declared to be unanimously carried.

⁶ 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).

~~the line extension and set a framework to maximise the local benefits it can bring.~~

Commented [NE6]: Not required for Regulation 19 plan

How the plan ~~is being~~has been prepared

Key stages

~~4.12.1.10.~~ There are a number of stages involved in the preparation of a local plan. ~~In addition, there are procedural requirements along with procedures~~ 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.

~~4.13.1.11.~~ Figure 1.2 sets out the key stages of the plan making process, highlighting the current stage of production.⁷

Consultation on Main Issues (Regulation 18)	October – November 2015
Pre-production (with community and stakeholder engagement). (This includes consultation on ‘Call for Sites’ exercises, landowner surveys and public engagement on the preparation of evidence base documents, including area-based strategies.)	Ongoing <u>Up</u> to October 2020
Consultation on the Main Issues and Preferred Approaches (Regulation 18)	Winter – Spring 2021 <u>January – April 2021</u>
Publication of the draft Local Plan / consultation on the, ‘proposed submission version document’. (Regulation 19)	Autumn 2021 <u>Spring 2022</u>
Submission to the Secretary of State and Examination in Public (Regulations 22-25)	Winter – Spring 2022 <u>2023</u>
Adoption by Council (Regulation 26)	Summer - Autumn 202 <u>3</u>

Commented [NE7]: Factual updates on plan programme

Figure 1.2: Key stages of the plan making process

Evidence base

~~4.14.1.12. We have compiled a number of~~The evidence base is made up of studies and supporting documents ~~to help that~~ 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.

⁷ These reflect the key stages of the plan-making process as set out in The Town and Country (Local Planning) (England) Regulations 2012, as amended.

~~4.15.1.13.~~ Our evidence base comprises technical studies, research reports, site and area masterplans, an Integrated Impact Assessment and other information covering a variety of policy topic areas ~~and local issues, including: design, housing, economy, environment, transport and infrastructure.~~ We have consulted local communities and other stakeholders on the preparation of some evidence base documents. This includes the Lewisham Characterisation Study (2019), the New Cross Area Framework (2019) and Catford Town Centre Masterplan Framework (2021). The evidence base documents have been made are publically available on the Council's website, and form part of the Local Plan library.

Commented [NE8]: Factual updates

Integrated Impact Assessment

~~4.16.1.14.~~ 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)

~~4.17.1.15.~~ 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.

~~4.18.1.16.~~ 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.⁸

Tests of soundness

~~4.19.1.17.~~ 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.

Tests of soundness for local plans (NPPF, paragraph 35).	
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.

⁸ 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.

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.

Table 1.1: Tests of soundness for local plans (NPPF, paragraph 35)

Duty to Cooperate

~~4.20.1.18.~~ The Localism Act (2011), subsequent regulations and the NPPF place a statutory duty on local planning authorities to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans. The Council has and will continue to work positively with its neighbouring authorities and other relevant public bodies to identify and address issues of strategic importance during the preparation and implementation of Lewisham’s new Local Plan. ~~We are in the process of liaising with stakeholders as part of the Duty to Cooperate and to inform the preparation of Statements of Common Ground, which will be published in due course.~~

Commented [NE9]: Not required for Regulation 19 plan

~~Getting involved in the new Local Plan~~

~~4.21. 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 are committed to 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.~~

~~4.22. This document has been prepared for a statutory public consultation (Regulation 18 stage). It sets out the main issues for the new Local Plan and possible options to address these, including our preferred policy approaches at this time. The draft Local Plan has been prepared taking into account feedback from the public through early consultation and engagement exercises, as outlined below.~~

~~Previous engagement and the journey so far~~

~~Starting the Local Plan review~~

~~4.23. We have undertaken a number of consultation and engagement exercises around the main challenges and opportunities for the Borough to inform the preparation of a new local plan. We launched the Local Plan review in 2015 and published several documents for formal public consultation.⁹~~

⁹The consultation documents, published in October 2015, comprised the Lewisham Local Plan— Consultation on Main Issues and companion questionnaire, Sustainability Appraisal Scoping Report and Infrastructure Delivery Plan (IDP) Framework Document.

4.24. At that time we invited local residents, community groups, businesses, key stakeholders and others with an interest in the Borough to help us to identify the key planning issues for Lewisham and the potential options for addressing them.

We have 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.⁴⁰ We have surveyed landowners of key strategic sites and 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?

4.25. 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 in 2019. At the regional policy level, 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 has recently undergone independent examination. Both the NPPF and the draft London Plan provide for fundamental changes to the planning framework for Lewisham.

4.26. 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. 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.

4.27. Since 2015 Lewisham itself has also changed. The existing local plan has helped to facilitate substantial 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 some parts of the Borough significant plan-led regeneration has also been realised, and is continuing, bringing benefits to local neighbourhoods and communities.

4.28. Finally, Coronavirus (COVID-19) has had a profound impact on countries around the world. The initial peak of COVID-19 was experienced by the UK in spring 2020. It has directly affected people and communities across Lewisham and remains an ongoing concern. The Council continues to play a critical role by working with its partners to deliver essential services. Our priority during this period is to support everyone in the Borough through these unprecedented times, safeguarding the health of local communities and protecting the most vulnerable. Despite the current uncertain circumstances, it will be vital to plan proactively towards a recovery. This means taking stock of the different ways in which Lewisham's neighbourhoods, communities and local economy have been (and may continue to be) affected and responding with timely and appropriate measures.

Early engagement on the main planning issues

⁴⁰ The Council carried out 'call for sites' exercises in May-June 2015 and September-November 2018. We also supported the London Mayor with the 'call for sites' in March-June 2016, as part of the London Strategic Housing Land Availability Assessment (SHLAA) informing the new London Plan.

4.20. The public consultation in 2015 identified a number of planning issues. Since then, we have continued to engage with local communities and other stakeholders to broaden our understanding of the key challenges and opportunities in Lewisham, including through the preparation of the evidence base documents. For example, we have undertaken consultation on the Lewisham Characterisation Study (2019) and area-based strategies such as the New Cross Area Framework and Catford Town Centre Masterplan.

4.30. As the starting point for preparing a new plan, we have looked at the adopted Core Strategy, its key development principles and what this strategy has delivered. We have identified a number of new challenges that need to be addressed at the strategic level. These relate 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.

4.31. Our early engagement exercises have also explored key issues and opportunities across specific topic areas. This includes: 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 town centres and local hubs; a need for areas outside of these key locations to accommodate investment and growth 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

4.32. Whilst many of the issues identified in 2015 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 of Lewisham in a rapidly growing London. Furthermore, there is greater urgency required to address specific issues, such as the climate emergency and COVID-19, 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.

4.33. Responses received on the 2015 main issues consultation and other engagement exercises have been considered in the preparation of this document. 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 have been taken into account.¹¹ We have used feedback from previous engagement to help identify the main issues for the Local Plan and to inform the preparation of the policy options and preferred approaches outlined here.

Have your say

¹¹ Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

1.34. This consultation provides the public with an opportunity to review and respond to the 'Lewisham Local Plan: Main Issues and Preferred Approaches' (Regulation 18 stage) document.

1.35. This document both builds on and is informed by previous consultation and engagement exercises, along with the latest evidence base. It reflects our understanding of the main issues for the new Local Plan along with possible approaches to address these through planning policy. The document also sets out the Council's preferred policy approaches at this time, having considered the reasonable alternatives.¹² This includes approaches to the spatial (growth) strategy for the Borough; detailed 'development management' policies on a range of topics; and area-based policies, with principles for the development and use of land on specific sites (site allocations).

1.36. This document is largely presented as a draft plan, with a clear structure and detailed policy proposals covering a range of policy areas. However it is imperative to stress that the new Local Plan is still very much in the early production stages. Notwithstanding the 'preferred policy approaches' included herein, the Council retains an open mind as to the scope and contents of the new Local Plan. We will take into account all representations made through this and other formal stages of consultation, and use them to inform the preparation of the plan.

1.37. We are now inviting feedback on the entirety of the 'Lewisham Local Plan: Main Issues and Preferred Approaches' document. This includes the matters we have identified to be addressed by the new Local Plan (i.e. the scope), its strategic objectives, the main planning issues and opportunities in Lewisham, and the possible policy approaches to address these. We also want to learn if there are any issues, opportunities and/or policy alternatives that have not yet been identified, but which should be considered as work on the plan progresses.

1.38. We will take account of all representations made during this Regulation 18 stage public consultation. Responses will be used to inform the 'publication' version of the new Local Plan, which will be made available for a further round of statutory public consultation (i.e. Regulation 19 stage). Throughout the plan's production, we will publish consultation statements summarising feedback received during statutory public consultation and how this has been taken into account.

Commented [NE10]: Not required for Regulation 19 plan

How to use the plan

1.39-1.19. 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 2040.¹³ The plan will help to support implementation of the draft London Plan and its Good Growth objectives locally, recognising that Lewisham is an integral part of London.

¹² An Integrated Impact Assessment (IIA) has been prepared alongside this Local Plan document. The IIA provides further details on the 'reasonable alternatives' identified and considered during the plan-making process, along with the reasons the Council has selected the 'preferred approaches' over other options, at this point in time.

¹³ The plan period differs from that initially proposed in the "Lewisham Local Plan – Consultation on Main Issues" (2015) document in order to comply with the new requirements of the NPPF (2019).

~~4.40. 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.~~

Commented [NE11]: Removed to make more concise

~~4.44.1.20. For legibility the Local Plan is set out in five main parts and sub-sections that cover a number range of thematic policy areas however it must be read as a whole, particularly for the purpose of planning and investment decisions. The order of topics and policies is not a reflection of their weight or importance.~~

~~4.42.1.21. The Local Plan is organised into five main parts:~~

- **Part One: Setting the scene and the spatial strategy** – Provides background information about the Local Plan. It then sets out the Vision for Lewisham and the plan's strategic objectives, ~~along with the. It also establishes the proposed~~ 'spatial strategy' for the Borough, the land-use priorities and overall pattern of development that the plan ~~will seek~~s to deliver.
- **Part Two: Managing development** – Sets out the ~~proposed~~ 'development management' policies – these are the ~~requirements standards and guidelines~~ that planning applications will need to comply with to support the delivery of Good Growth in Lewisham. These are organised by ~~thematic~~ policy topic areas. ~~– for each we highlight how we have arrived at the proposals, as set out below:~~
 - ~~What you've told us~~ – A summary of comments from early consultation and engagement exercises. This includes feedback from studies and area-based strategies that have informed, and will help to support, the Local Plan (e.g. New Cross Area Framework and Catford Town Centre Masterplan).
 - ~~What we've learned~~ – Key findings from research and studies of the Borough.
 - ~~Main issues~~ – Our understanding of the main issues for the new Local Plan, drawing from public feedback and the evidence base.
 - ~~We're proposing to~~ – A short summary of the preferred policy approaches to address the main issues. The full details of the preferred approaches are included afterwards (these are distinguished by draft policies with titles and reference numbers).
 - ~~We've also considered~~ – Identifies the other policy approaches that have been considered (i.e. reasonable alternatives) but which are not proposed to be taken forward in the draft plan.¹⁴

Commented [NE12]: Not required for Regulation 19 plan

¹⁴The Lewisham Local Plan Integrated Impact Assessment (IIA) – Interim Report (2020) includes a detailed discussion of the reasonable alternatives considered during the preparation of this Local Plan document.

- **Part Three: Lewisham’s neighbourhoods & places** – Establishes five character areas ~~within the Borough~~ based around Lewisham’s distinctive neighbourhoods and places. A vision, spatial objectives and ~~strategic priorities~~ ~~planning policies (referred to as ‘place principles’)~~ are set out for each of these areas, ~~along with~~ including site allocation policies for ~~strategic-specific~~ development sites.
- **Part Four: Delivery and monitoring** – Sets out the implementation framework for the Local Plan, ~~as well as~~ along with the arrangements for monitoring ~~delivery~~ outcomes over the plan period.
- **Part Five: Schedules and appendices** – Includes additional technical information and guidance to support implementation of the plan.

Strategic and non-strategic policies

~~4.43.1.22.~~ 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.¹⁵ The NPPF also makes clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies.¹⁶ A schedule of the Local Plan non-strategic policies is included in in Part 5 of the Local Plan. Those policies not included in the schedule~~d~~ are strategic policies.

Neighbourhood planning

~~4.44.1.23.~~ We will continue to work with local communities and community groups, ~~including amenity societies~~, to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process.

~~4.45.1.24.~~ 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.

~~4.46.1.25.~~ 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.

Commented [NE13]: Respond to consultation – request for amenity groups to be referred

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

Commented [NE14]: This sub-section will be subject to further review and factual updates, for example, to reflect new technical evidence.

¹⁵ Planning and Compulsory Purchase Act 2004, Section 39(2).

¹⁶ NPPF (2019), paragraph 21.

also identifies some of the main opportunities and challenges facing Lewisham's residents, businesses and visitors, including considerations for the built and natural environment.

Figure 2.1: Lewisham borough map

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.

Figure 2.2: Lewisham in context

Figure 2.3: Levels of deprivation in Lewisham

- 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 movement by walking and cycling. 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 provides an overview of some of the key strategic 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 2040.¹⁷ 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. There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038. 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

¹⁷ [Greater London Authority, Housing-led population projections \(2017\)](#)

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.

The draft London Plan includes a commitment to the Bakerloo line extension (BLE). The BLE will connect Lewisham to the London Underground (tube) network for the first time. It has huge potential to both facilitate and support growth by helping to unlock the development potential of areas and sites, as well as improving transport accessibility in Lewisham and the wider southeast. The BLE Local Economic Assessment (2020) is an evidence base document which supports the Local Plan, and shows the extent to which the BLE will act as a catalyst for growth in housing, business space and jobs.

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 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 realising~~ the 'Vision for Lewisham':
- 3.2. 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

- 3.3. The ~~following sub-section sets out the strategic objectives for the Local Plan.~~ ~~The~~strategic objectives ~~help to~~ form a link between the Vision for Lewisham and the spatial strategy. They ~~are set in the context of~~address 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 the~~ Local Plan.
- 3.4. 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.
- 3.5. 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.
- 3.6. Lewisham Local Plan – Strategic objectives

A An Open Lewisham as part of an Open London	
1	Sustain and create inclusive neighbourhoods and 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 Housing tailored to the community with genuinely affordable homes	
2	Proactively respond to population growth and help to meet London's housing need by positively managing the delivery of new homes across the Borough.
3	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.
4	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.
C A thriving local economy that tackles inequalities	
5	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. <u>Enable the development of green industry and promote the greening of existing industries to reduce their environmental impacts and support the transition to a low carbon, circular economy.</u>
6	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 opportunities.
7	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.
D A greener Borough	
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.
E Responding to the climate emergency	

Commented [NE15]: Respond to consultation – request that green industry and transition to circular economy be included as an objective

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 reduce car use and maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect.
12	<u>Support the delivery of the Thames Estuary 2100 plan.</u> 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.
F Celebrating our local identity	
13	Retain, reinforce and help shape the distinctive character and identity of Lewisham's communities and townscapes by ensuring that all new development responds positively 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.
G Healthy and safe communities	
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 <u>applying</u> the Healthy Streets principles <u>Approach</u> , making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
18	<u>Promote cohesive communities along with walkable and liveable communities <u>neighbourhoods</u> 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.</u>
19	Create safer neighbourhoods 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.
H Securing the timely delivery of infrastructure	
20	Provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely

Commented [NE16]: Respond to consultation –request for TE2100 to be referred in objectives

Commented [NE17]: Amended for consistency with London Plan terminology

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	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.
1	Ensuring high quality education, health and social care
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

3.7. The Local Plan will set out a spatial strategy to facilitate the delivery of Good Growth in Lewisham. The spatial strategy provides a clear direction for the development and use of land across the Borough over the long term. The spatial strategy is also a vital tool used by the Council, its partners and other key stakeholders to guide decisions on investment, particularly for infrastructure and services.

3.8. The following section sets out some of the key considerations informing the preparation of the spatial strategy for the Borough.¹⁸ It then discusses the spatial strategy options that are being explored for the Local Plan. Finally, the section sets out the 'preferred approach' for the spatial strategy, which is detailed in draft Policy OL1 (Delivering an Open Lewisham).

Key considerations

Growth requirements

3.9. The spatial strategy addresses the amount and distribution of development across the Borough. Lewisham's future growth requirements provide a useful starting point for considering spatial options. The Council must plan positively to meet identified development needs, including for housing, workspace and space to accommodate main town centre uses (such as retail floorspace and community facilities). Like the rest of London, Lewisham has gone through a period of rapid growth and this is expected to continue. Many more new homes must be built to meet the needs of a growing population.¹⁹ There are also pressing needs for new business space to support and grow the local economy.²⁰ In order to ensure these needs are

¹⁸ The Lewisham Local Plan Integrated Impact Assessment (IIA) — Interim Report (2020) should be referred for further information on the considerations informing the spatial strategy options.

¹⁹ The draft London Plan sets a target for Lewisham of 1,667 net new homes per year. Alternatively, a Local Housing Need (LHN) figure calculated using the method set out in the NPPF suggests a minimum housing need figure of 2,964 net units per year.

²⁰ There is an estimated demand for approximately 5,300 net additional square metres of retail floorspace up to 2030 and 21,800 net additional square metres of employment floorspace up to 2038.

addressed the Local Plan must help to facilitate a significant amount of new development.

London Plan

3.10. The London Plan is the spatial development strategy for the region. The spatial options must align with the direction provided by it. This includes focussing growth in Opportunity Areas and highly accessible locations, such as town centres; enabling the delivery of strategic transport infrastructure (such as the Bakerloo line extension) as a means to optimise the development capacity of sites and support growth; directing new investment to regeneration areas; and making better use of out-of-centre retail parks. These priorities are illustrated in Figure 3.1.

Character-led growth

3.11. The character of Lewisham's neighbourhoods is highly valued and contributes to its distinctiveness. Recognising this, we are seeking to facilitate character-led growth so that new development responds to the unique qualities of our localities and communities. The Lewisham Characterisation Study (2019) has been prepared to support the Local Plan. It identifies areas of the Borough where existing character may be reinforced, re-examined or re-imagined, as set out in Figure 3.2. The study provides an indication of opportunities where growth could be accommodated, including the London Plan Opportunity Areas and major centres, along strategic corridors (such as the A21) and in the Bell Green / Lower Sydenham area.

Green and open spaces

3.12. Green and open spaces are vital to the Borough, its people and the environment and will continue to be protected in line with the London Plan and the NPPF. The network of green infrastructure is shown in Figure 3.3. As part of the Local Plan review we have carried out assessments of these spaces²¹ to understand whether it would be appropriate to make adjustments to the extent of existing boundaries, as well as to designate or de-designate sites.

Potential development sites

3.13. We have carried out an assessment to identify land that might be available to accommodate new development for a range of uses, as well as the capacity of these sites.²² As part of this, we have invited the public to identify sites for consideration through 'call for sites' exercises. We have also worked with the Mayor of London on a Strategic Housing Land Availability Assessment (SHLAA). A sufficient supply of readily developable sites is crucial to ensuring the Local Plan is deliverable. Figure 3.4 shows the package of strategic sites that we have currently identified.²³

²¹ These assessments include the Lewisham Metropolitan Open Land Review (2020), Lewisham Parks and Open Space Assessment (2019) and Re-Survey of Sites of Importance for Nature Conservation in Lewisham (2016).

²² Further information is set out in the Lewisham Local Plan: Site Allocations Background Paper (2020).

²³ The 'strategic' sites are mainly 0.25 hectares or greater in size.

Figure 3.1: London Plan growth area priorities

Figure 3.2: Lewisham character-led growth strategy from the Lewisham Characterisation Study, 2018

Figure 3.3: Lewisham's network of green infrastructure

Figure 3.4: Land available for development

Spatial strategy options

3.14. Taking into account these key considerations, along with other opportunities and constraints for new development, we have established several spatial strategy options (i.e. reasonable alternatives) that should be considered for the Local Plan. The options address the amount of development that could be accommodated in the Borough, as well as the distribution of this. The options have been assessed through the plan's Integrated Impact Assessment (IIA) — Interim Report (2020). Findings of the IIA have been used to inform the 'preferred approach' for the spatial strategy.

3.15. The draft London Plan identifies the Bakerloo line extension (BLE) as a strategic transport infrastructure priority. Once delivered, the BLE will have a transformative effect in Lewisham by significantly enhancing transport accessibility in many parts of the Borough and improving links to south east London. It will also play an instrumental role in generating new investment and helping to unlock the development potential of sites.

3.16. Funding for the BLE has not yet been committed. It is therefore necessary to take a pragmatic approach to the BLE by planning positively to secure its delivery, but recognising that some or all phases may not be delivered within the plan period. We have therefore established 3 main scenarios with different assumptions on the BLE delivery, as follows:

- Scenario 1 — No BLE (Figure 3.5)
- Scenario 2 — BLE Phase 1 (Figure 3.6)
- Scenario 3 — BLE Phase 1 and 2 (Figure 3.7)

3.17. For each BLE scenario two spatial options have been established. Accordingly, six reasonable alternatives are being considered. An illustrative summary of the options for each scenario is presented in the maps below. These explore the potential to optimise the capacity of sites to meet the Borough's identified needs, particularly for housing, in the context of supporting Good Growth.

3.18. The IIA should be referred for further details on the options as well as assessments of their likely social, environmental and economic impacts.

Figure 3.5 Spatial options 1a and 1b (No BLE)

Figure 3.6 Spatial options 2a and 2b (BLE Phase 1)

Figure 3.7 Spatial options 3a and 3b (BLE Phase 1 and 2)

The preferred approach is illustrated in **Figure 3.8**

~~3.19. Additional alternatives have been considered but discounted. They include the options to focus new development and growth exclusively within the London Plan Opportunity Areas and to distribute growth more evenly across the Borough. These options have been discounted because they are not considered to be reasonable. They would inhibit the Council from meeting identified needs, owing to the lack of development sites and infrastructure to support their delivery.~~

~~Figure 3.5: Scenario 1 options — No BLE~~

~~Figure 3.6: Scenario 2 options — BLE Phase 1~~

~~Figure 3.7: Scenario 3 options — BLE Phase 1 and 2~~

The preferred approach

~~3.20. In the absence of certainty over the delivery and timing of the BLE, the preferred approach aligns with Scenario 1. However, there is also a need to ensure the Local Plan sets out a clear framework to secure the delivery of the BLE, and to maximise its role and benefits in supporting Good Growth. Therefore, the preferred approach allows sufficient flexibility to respond quickly to the phased delivery of the BLE. This will provide that the development capacity of local areas and sites can be optimised, aided by significant improvements in public transport accessibility, whilst ensuring sufficient infrastructure is in place to support Lewisham's neighbourhoods. The preferred approach is also a character-led response to managing growth over the long term, one which seeks to respect and enhance the distinctive qualities of the Borough's natural, built and historic environment.~~

~~Figure 3.8: Proposed growth strategy~~

~~Figure 3.9: Borough-wide spatial strategy plan~~

Commented [NE19]: Not required for Regulation 19 plan

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~~ **address** the strategic objective for 'An Open Lewisham as part of an Open London'. **Good Growth will be delivered in the Borough** by:

Commented [NE20]: Policy amended throughout to make more concise and to aid implementation – policy principles retained

- a. ~~Ensuring that the growth and regeneration potential of~~ **Directing new development to Growth Nodes and Regeneration Nodes, including in Lewisham's London Plan Opportunity Areas are fully realised, specifically at of New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside, and carefully managing growth in these locations, 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 **development and** 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~~ **the environmental, social**

and economic barriers that affect the lives of people in these areas, and ensure equality of opportunity;

- c. ~~Promoting a vibrant and diverse multi-centred Borough by directing~~ Directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vibrancy, 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~~ be designated as a metropolitan centre ~~status~~ in a future review of the London Plan;
 - 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~~ Directing new development along the ~~north-south~~ A21 corridor (~~Lewisham High Street, Rushey Green and Bromley Road~~) and other strategic Growth eCorridors (~~such as the east-west New Cross Road / A2 corridor~~) as well as around principal transport routes, nodes and interchanges, to support growth, and along with using the Healthy Streets Approach to enhance the quality of places. ~~This includes improvements to and better link~~ improve connections within and between 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 sites across the Borough. ~~This is particularly in the~~ The delivery of the Bakerloo line extension will enable and support growth in London Plan Opportunity Areas and Lewisham's southern areas, including Bell Green and Lower Sydenham; ~~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~~ Making the best use of land and space by, 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 and enabling the sensitive intensification of established residential neighbourhoods and commercial areas;
- g. ~~Requiring~~ Ensuring all new development ~~to be~~ follows delivered through the design-led approach, ~~and informed by an understanding of~~ responds positively to local area character distinctiveness (including the historic, cultural, natural and built environment), ~~to enhance local distinctiveness,~~ and ~~to help~~ to

secure ~~inclusive, safe,~~ liveable, walkable ~~and,~~ healthy ~~and safe communities that are inclusive to all~~ neighbourhoods;

~~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 ~~through by~~ walking and cycling; ~~as an integral component of Good Growth along with~~

~~h.i.~~ Ensuring that ~~a strategic and coordinated approach is taken by the Council and its partners to all new development~~ responds to the climate emergency; ~~with -and requiring new development to integrate~~ measures for climate change adaptation and mitigation.

Explanation

~~3.21.~~ This ~~policy~~ is the overarching ~~strategic~~ policy for the Local Plan and is the starting point for achieving the Vision for Lewisham ~~and responding to the plan's strategic objectives~~. It sets out the spatial strategy for the Borough, ~~which~~ This 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'. The policy provides a key link between the Local Plan and the London Plan. It will help to ensure that Good Growth is~~

~~3.22.~~ 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.

~~3.23.~~ Finally, the policy helps to address the 'Good Growth' policies 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 of infrastructure and development. 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 Areas objectives

~~3.7.~~ The London Plan identifies two Opportunity Areas within Lewisham. ~~They comprise the New Cross / Lewisham / Catford corridor and the area at Deptford Creek / Greenwich Riverside. Opportunity Areas are "significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity"~~²⁴. The London Plan requires the Local

Commented [NE21]: Policy supporting text amended throughout to include factual updates and make more concise

²⁴ London Plan (2021), paragraph 2.2.1.

~~Plan to encourage and deliver the growth potential of these areas. 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.~~

~~3.24-3.8. In recent years The Council has set a clear strategy for the Opportunity Areas and helped to facilitate there has been a significant amount of new development and investment within them in these areas, which has been steered by the local planning framework. A number of strategic large development brownfield sites have now been delivered/redeveloped or are expected to come forward soon, with planning consent granted and/or construction started. These new developments have already delivered, or are committed to provide. The areas have also benefited from the delivery of many more new homes including affordable housing, modern workspace and community facilities, or along with new and improved transport infrastructure, open space and other public realm enhancements and community facilities.~~

~~3.25-3.9. We will continue to seek to deliver the objectives for realise the growth and regeneration potential of the Opportunity Areas through the Local Plan, working with the Greater London Authority and other key stakeholders alongside development industry partners and local communities. The spatial strategy directs new development and investment to these areas. Part 3 of the Local Plan provides further details on how growth and change will be managed within the Opportunity Areas. Additional guidance has been prepared to identify future priorities and opportunities for development and area improvements for these areas, including the New Cross Area Framework, A21 Development Framework and the Catford Town Centre Masterplan Framework. 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

~~3.26-3.10. 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 environmental, social and economic barriers adversely affect peoples' lives 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 seeks to tackle deprivation ~~sets a proactive strategy to by coordinate and direct~~ ~~coordinating~~ new investment ~~to within~~ these areas. It also highlights for our stakeholders and delivery partners the need for targeted interventions to ~~tackle~~ ~~address~~ the specific causes of deprivation and ~~to ensure equality of opportunity inequality~~. This includes investment ~~in the built and natural environment and supporting as well as~~ programmes ~~for education, training, health and social care~~. Deprivation is most prevalent in Opportunity Areas, ~~as well as~~ the Strategic Area for Regeneration ~~and Regeneration Nodes~~, ~~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~~ Thriving and resilient town centres

~~3.27.3.11.~~ The Local Plan seeks to ~~promote ensure that~~ Lewisham as a multi-centred, or polycentric, Borough. ~~This is one that is defined by features~~ a well-connected network of ~~complementary,~~ thriving and resilient town centres ~~which act as hubs both serving and linking local communities~~. ~~The spatial strategy directs new development to town centres and their surrounds~~. It supports the '15-minute neighbourhood' concept, where centres provide people with most of their needs ~~within a short walk or cycle journey from their home~~. 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 make~~ ~~neighbourhoods more sustainable and ensure~~ equality of opportunity across Lewisham.

Commented [NE22]: Respond to public consultation – recognition that plan and spatial strategy is supporting '15-minute' neighbourhood concept

~~3.28.3.12.~~ 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~~ ~~The Borough's town centres benefit from~~ ~~tend to~~ ~~have~~ higher levels of public transport accessibility and transport interchanges, along with a ~~core concentration~~ of services and community facilities, ~~making them well-placed to accommodate more people and activities~~. New development can support town centre vitality particularly where large schemes deliver public realm and townscape improvements. ~~Furthermore,~~ ~~There are also~~ opportunities to secure the long-term viability of ~~these town~~ 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.

~~3.29.3.13.~~ ~~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 ~~growth and new~~ 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. ~~Further details about the character and~~

role of Lewisham's town and local centres, along with parameters for development within and around town them, are set out in Part 2 and Part 3 of the Local Plan.

3.30. 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.

3.31. 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.

3.32. 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 Growth Corridors

3.33-3.14. To achieve a successful multi-centred Borough it is vital that there are legible, The delivery of Good Growth will require that people are enabled to live car-free lifestyles and travel mainly by walking, cycling and public transport. To make this happen Lewisham will need to be supported by an excellent public transport system along with a network of high quality, safe and efficient walking and cycle routes. Good connections, both to and between town centres, parks and green spaces and residential neighbourhoods are integral to liveable neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. Also, the future prospects and long-term viability of Lewisham's town centres and other employment locations 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.

3.34-3.15. The London Plan The Opportunity Areas define a central growth corridor in Lewisham, which This covers a large area to the north of the Borough Deptford and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on the The A21 corridor road (Lewisham High Street, Rushey Green and Bromley Road) is the

Commented [NE23]: Repetition – covered elsewhere in plan

principal north-south route within this corridor. Elsewhere there are several strategic major 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).

~~3.35. 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 – by give priority to movement by walking and cycling, as well as addressing vehicular dominance and reducing vehicle speeds. These principles are covered elsewhere in the plan, including Policy TR3 (Healthy streets as part of healthy neighbourhoods).~~

3.16. These main roads currently prioritise vehicular movement. They are car-dominated, often suffer from congestion and adversely impact on local amenity, for example, by contributing to noise and air pollution. The major roads and their surrounds can be transformed into safer, healthier and more attractive places by using the Healthy Streets Approach. To achieve this it will be necessary to rebalance the 'link' function of the roads, giving priority to movement by foot, cycle and public transport, and also enhancing their 'place' qualities. Investment within the growth corridor will be necessary deliver Healthy Streets. The Local Plan therefore directs new development along the main roads and supports the intensification of sites around them. Part 3 of the Local Plan includes site allocations where new development will be required to deliver public realm and other area enhancements. The Council's A21 Development Framework and New Cross Area Framework support the implementation of this policy.

Strategic infrastructure: the catalyst for growth and investment
Securing infrastructure to support our neighbourhoods and communities

~~3.36.3.17. In order to achieve the objective of an Open Lewisham – it is imperative that all residents are everyone in Lewisham is able to share in the opportunities and benefits that growth and regeneration bring. We will therefore~~The Council will continue to work with its key stakeholders and development industry partners to deliver the essential infrastructure needed to support and enhance our neighbourhoods and communities need. We have prepared an Infrastructure Delivery Plan (IDP) which will be used to inform planning and investment decisions. This will help us to secure infrastructure where and when it is needed. Further details are set out in Part 4 of the Local Plan. In addition, we will lobby for and seek to secure strategic infrastructure of the type that can act as a catalyst for

Commented [NE24]: Rephrased in paragraph below for clarity

growth and investment, and which can help the Borough to fully realise its development potential.

~~3.37.3.18. 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. Despite being an inner-London borough some parts of Lewisham are poorly served by public transport. This is a key factor influencing the deprivation experienced by people in the Borough. We have prepared "A Vision for Rail"²⁵ that which sets out our priorities to address identified gaps in such transport provision, and to ensure Lewisham is able to appropriately support London's growth. Of key significance is the Bakerloo line extension, which is supported by the draft London Plan. It is proposed that this Underground line is extended from Elephant and 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.~~

Commented [NE25]: Incorporated into paragraph below

~~3.38.3.19. The London Plan commits to extend the Bakerloo line extension on the Underground (tube), from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. This would enable a potential further southward extension beyond Lewisham. The Bakerloo line extension (BLE) is essential to supporting Opportunity Area objectives and providing London's growth, and will help to the necessary transport infrastructure to facilitate a significant uplift the delivery of many more new-in homes and jobs in the New Cross / Lewisham / Catford corridor Opportunity Area. Furthermore, the potential future further extension of the Bakerloo line line to the southern part of the will also enable Borough is imperative to enable transformative investment and managed change growth in the -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 within the highest 20% deprived nationally, 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. The Council envisages a A future London Plan Opportunity Area is envisaged for this part of the Borough here, linked to the BLE, and we will continue to work with the Mayor of London on planning 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.~~

Commented [NE26]: Amended to make more concise and reduce repetition of points covered elsewhere in plan

Making the best the use of land and space

~~3.39.3.20. 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. The spatial strategy directs higher density and mixed-use development to well-connected and other key~~

²⁵ [Lewisham Council - A Vision for Rail \(2017\)](#)

locations. It is supported by the Part 2 policies, which require that new development is designed to a high quality standard and makes the optimal use of land. For example, by making provision for the co-location of uses or designing buildings and spaces which are adaptable to the needs of different activities and users.

~~3.40. 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.~~

~~3.41. 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. The introduction of car-free or car-capped developments in highly accessible locations, such as town centres, together with high quality public realm can also provide for a more effective use of land.~~

~~3.42. — Where appropriately located, higher density and mixed-use developments that respond positively 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.~~

~~3.43-3.21. This The policy seeks spatial strategy prioritises 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 Part 3 of the Local Plan includes a number of strategic site allocations policies where requirements have been set to ensure that the optimal best use of land and optimal capacity of sites is realised. These allocations are largely set mainly located within the Opportunity Areas, Growth Nodes, Regeneration Nodes, town centres and along 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. Elsewhere, the sensitive intensification of established residential neighbourhoods and commercial areas will be supported. This will be enabled by mainly by the redevelopment of small sites.~~

Celebrating Lewisham's diversity and enhancing its distinctiveness

~~3.44. 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.~~

Commented [NE27]: Repetition – covered elsewhere in plan

Commented [NE28]: Amended for consistency with Key Diagram

Commented [NE29]: Repetition – covered elsewhere in plan

~~3.45-3.22. We recognise that good design is integral to good planning.~~ The Local Plan therefore sets a clear framework for improving the quality of places, and requires all ~~proposals for~~ new development to be delivered through a design-led approach. This means that new development must be based on an understanding of the site context and respond positively to the Borough's local distinctiveness. The use of the design-led approach will help to ensure that ~~these the~~ unique and valued features of our ~~communities-neighbourhoods~~ remain at the heart of the spatial strategy, and are fully considered in planning decisions.

~~3.46-3.23. 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 R,~~ respecting local character and accommodating ~~change-growth~~ 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

~~3.47-3.24. The Council takes seriously its responsibility to~~ ~~is committed to~~ promoting and securing sustainable development, ~~as evidenced by our declaration of a~~ ~~We have declared a~~ climate emergency and ~~commitment to~~ prepared an ~~Climate Emergency Action Plan which will work in tandem with the Local Plan.~~²⁶. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs.²⁷ Environmental stewardship is an integral part of this. London's natural assets are an irreplaceable resource and need to be ~~preserved-conserved~~ and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

~~3.48-3.25. The Local Plan sets a framework for managing Good 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 ~~(delivering net gains in biodiversity)~~, open spaces, ~~and~~ 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 ~~made more resilient and~~ well placed to adapt to the consequences of it. ~~Part 2 and Part 3 of the Local Plan set out further detailed requirements for new developments.~~

²⁶ [Lewisham's Climate Emergency Action Plan \(March, 2020\).](#)

²⁷ [The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations](#)

Commented [NE30]: Repetition – covered elsewhere in plan

3.49. 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.

Furthermore, as detailed elsewhere in the plan, all development proposals will be expected to demonstrate through the design-led approach 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.

Commented [NE31]: Repetition – covered elsewhere in plan

Part Two:

Managing development

35

4 Managing development

4.1. Part Two of the Local Plan forms a key part of our approach to managing new development across the Borough. It includes policies that will help to facilitate the delivery of Good Growth whilst ensuring Lewisham's distinctiveness is recognised, celebrated and enhanced. The following section sets out planning policies across a range of key topic areas 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 a whole. All development proposals should address how they will contribute to the achievement of the Local Plan's strategic 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

What you've told us

The character and identity of Lewisham's neighbourhoods is highly valued.

There are mixed views about whether:

- Some new developments are harmful to local character
- High rise buildings and tower blocks should be allowed

People would like to see:

- Stronger protection for the cultural and natural environment
- Safer and attractive public spaces
- Guidelines for smaller developments, such as basements and extensions

What we've learned

Lewisham has a distinctive character and identity

- The development of Lewisham over time has shaped the character and identity of our neighbourhoods and communities today.

Key parts of the borough's character are

- Natural features, such as green spaces and rivers
- Town centres
- Residential areas
- Views (some of which lead to landmarks, such as the view from Blackheath to St Paul's Cathedral)

Diversity shapes experiences

Lewisham is home to people of many backgrounds, ages and abilities who use and experience buildings and spaces differently.

Main Issues

Local character

Lewisham's growth must be carefully managed so local character is enhanced and not harmed.

Density

To meet pressing needs for new homes and jobs it will be necessary to build to higher densities in some places, including with taller buildings.

Inclusive places

To create more inclusive places, buildings and spaces must be easy to access and use for people of all ages and abilities and at different stages of life.

We're proposing to...

Ensure growth is character-led

- Require new development to contribute positively to local character
- Identify and protect important views, vistas and landmarks
- Encourage developers to consult with communities when designing schemes and to treat proposals more favourably when this is done effectively

Promote inclusive and liveable neighbourhoods

- Create safe and attractive public spaces that are accessible to all
- Use London Plan standards for new housing, including indoor living and outdoor amenity space
- Ensure development avoids and mitigates harm to the environment, and does not pose a risk to public health and safety

Make the best use of land

- Ensure the density and mix of new development is right for its location.
- Identify places where tall buildings may be appropriate, and only allow them if they meet our high design standards.

We've also considered

- Setting density standards for new developments in different areas or locations
- Setting limits on the height of tall buildings

Commented [NE32]: Not required for Regulation 19 plan

QD 1 Delivering high quality design in Lewisham

Using the design-led approach

- A. All new development must follow a design-led approach to contribute to delivering high quality, inclusive, safe, healthy, liveable and sustainable neighbourhoods in Lewisham. This requires the consideration of design options at the early stage of the development process informed by an understanding of the site and its 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 positively to the local context, along with the optimal use of land to support the delivery of the spatial strategy for the Borough.

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 respond positively to Lewisham's local distinctiveness ~~by providing for~~ ~~by delivering~~ buildings, spaces and places that reinforce and enhance local character. This includes the special and distinctive visual, historical, environmental, social and functional qualities of places that contribute to local character, identity, sense of community and belonging. as well as promote inclusive neighbourhoods and communities.

Commented [NE33]: Amended to make more concise – this point is reflected throughout the plan

- ~~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.~~

Commented [NE34]: Incorporated into B above.

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

Commented [NE35]: Respond to consultation – more emphasis on cultural assets in decision making

Places for people

~~E.D.~~ All new development proposals should must put people at the centre of the design-led approach, ensuring buildings and spaces are welcoming, inclusive, safe and accessible to all people of all backgrounds, ages and abilities. ~~Proposals should~~ Development should be designed and built to a human scale by responding to the ways in which demonstrate an understanding of how people move through, engage with and experience their surroundings, ~~and respond positively to this by delivering healthy, liveable and walkable neighbourhoods.~~

Commented [NE36]: Respond to consultation – request for 'human scale' be a design criteria

~~F.E.~~ Development proposals will be supported where they help to must be designed to facilitate good physical and mental health, ~~and contribute to support~~ the wellbeing of the population ~~and foster community cohesion by providing:-~~

~~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:

Commented [NE37]: Incorporated in E above

a. Buildings and spaces that are inclusive, intuitive to use, comfortable, safe and secure;

~~a-b.~~ A high quality public realm that maintains and wherever possible enhances access to green and open spaces;

b. ~~Delivery of a high quality and effectively managed public realm that both encourages and enables convenient movement by walking and cycling, including by:~~

i. ~~Responding to people's movement patterns and desire lines in an area;~~

ii. ~~Integrating wide pavements and/or widening pavements where these already exist;~~

iii. ~~Making provision for cycle parking infrastructure and bus stops within the public realm; and~~

iv. ~~Reducing vehicular dominance and speeds.~~

c. Positive and active frontages that generate visual interest and which have a positive interface well-relationship with the public realm, particularly at the street-level;

Commented [NE38]: These policy criteria have been moved to QD3 Public Realm.

d. ~~Provision of W~~ well-integrated, dedicated space and equipment for relaxation, social interaction and physical activity, including where appropriate space for play and informal recreation; and

e. A high standard of amenity ~~is provided, with development that prevents and/or mitigates impacts of noise, vibration, poor air quality and addresses other environmental impacts, such as daylight and sunlight.~~

Commented [NE39]: Repetition – addressed by Amenity and Agent of Change policy

Well-functioning and resilient places

~~H.F.~~ The form and layout of development should be designed to Development proposals must be well-integrated within their neighbourhood. They must provide secure a positive and 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;~~
- a. The compatibility of land-uses and activities within and surrounding the development;
- b. The need to ensure that sites and neighbourhoods are legible and well-connected, both and for development to encourage by encouraging and enabling movement by walking, cycling and the use of public transport; and
- c. The efficient servicing and effective management of buildings and the public realm, including for delivery and servicing vehicles.

Commented [NE40]: Amended for clarity and to aid policy implementation

Commented [NE41]: Respond to public consultation – design to not only enable but 'encourage' sustainable modes of transport

~~I.G. In order to contribute to well-functioning neighbourhoods and places, new~~
 Development must be appropriately supported by infrastructure (including transport, community and green infrastructure). Development 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.H. Development proposals must be designed to assist in mitigating climate change and also integrate adaptation measures to make neighbourhoods and properties more resilient to its impacts, including by maximising opportunities for urban greening through adaption measures with reference to other Local Plan policies. Proposals should be designed and constructed to deliver net gains in biodiversity and 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).~~

Commented [NE42]: Repetition - covered elsewhere in plan

Delivering high quality development

~~K.I. Development proposals must submit include a Design and Access Statement to demonstrate how they have followed the design-led approach has been applied to deliver high quality development in accordance with (A-J) above.~~

- ~~L.J. Development proposals will be expected to have regard to and 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.K. 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 respond positively 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

Commented [NE43]: The policy supporting text has been amended throughout to make more concise

- 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~~ ~~and~~ ~~achieve~~ ~~address~~ the Local Plan's strategic objectives, it is imperative that all new development ~~delivered~~ is high designed, built and managed to a high quality development standard. ~~This policy advocates that a design-led approach is used to in order to ensure that development successfully responds to its local context, using the design-led approach. 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 t~~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 positively to people's sense of place ~~and belonging~~. 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 development site's local context. This ~~context~~ includes the distinctive character of the site along with and 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~~ will support its implementation. It should be referred to as a useful starting point for ~~considering~~ development proposals, ~~and will assist in as it providing provides~~ 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 positively 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 will require that ~~proposals new~~ developments optimise the capacity of sites. There is a need to accommodate a significant amount of growth within the Borough over the plan period, which must be. ~~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 the optimal capacity of development sites is realised~~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.~~ The 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, respond positively 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).~~

~~5.7.5.6.~~ 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, as well as funding opportunities to boost the delivery of genuinely affordable housing.

~~5.8.5.7.~~ 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

Commented [NE44]: Repetition - covered in Part 5 Delivery and Monitoring.

Commented [NE45]: Addition to ensure point in deleted paragraph above is retained.

the panel are fed into the assessment of pre-application schemes, planning applications and appeals. Major and other significant development proposals should be brought to the panel at the early stage in the planning process. Further information about the DRP is available on the Council's planning webpage.

~~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.~~

~~5.10.5.8.~~ 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 respond positively 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 approach 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 as well as~~ to feel safe in their surroundings wherever they are. ~~All new Development proposals will be required to~~ must include an Inclusive Design Statement to demonstrate how they will contribute to delivering inclusive, accessible, safe and secure environments in Lewisham.
- B. Development proposals must respond positively to the diversity and varied needs of Lewisham's population and promote social cohesion 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 with no disabling barriers that inhibit~~ restrict or prevent convenient 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;

Commented [NE46]: Removed to make more concise – this information is set out on Council's webpage, and paragraph above has been amended to refer this

Commented [NE47]: Respond to consultation and Member feedback – stronger requirements to demonstrate inclusive design

Commented [NE48]: Amended for consistency with London Plan language

- d. Delivering a high quality public realm, in line with [Policy QD-3](#) (Public realm and connecting places); and
- e. 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~~Where development proposals incorporate perimeter or gates~~external gates, the use of these~~ 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~~must 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.

Commented [NE49]: Amended for clarification and to aid policy implementation - restriction on gated development applies to all development not just housing

Accessible and inclusive housing

D. To help ensure that housing is designed to meet the ~~different-varied~~ requirements of Lewisham's resident population development proposals ~~will be expected to~~must 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. ~~Development proposals for housing must be designed to maximise tenure integration and be 'tenure neutral', having regard to the National Design Guide or latest equivalent.~~

Commented [NE50]: Respond to consultation and Member feedback - to give effect to National Design Guide on tenure neutral housing.

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

Explanation

~~5.11.5.9.~~ 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. ~~Development proposals must therefore apply i~~inclusive and safe design principles ~~should therefore be using considered at the early stage in~~ the

design-led approach, ~~ensuring that people of all ages and abilities are able to benefit from high quality, accessible, safe and secure environments. This will need to be demonstrated through an Inclusive Design Statement, submitted as part of the Design and Access Statement.~~

~~5.12-5.10.~~ 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~~including 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.~~

Commented [NE51]: Removed to make more concise – already stated in policy

~~5.13-5.11.~~ Development proposals should take into account and respond positively to the diverse needs of Lewisham’s population, including families and those in groups with protected characteristics.²⁸ 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).

~~5.14-5.12.~~ ~~We will strongly encourage the~~Development proposals should use ~~of the latest standing guidance on~~ ‘Secured by Design’, ~~or equivalent guidance, 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 layouts which allow for ‘eyes on the street’, 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.~~

Commented [NE52]: Repetition - stated in Policy above.

Accessible and inclusive housing

~~5.15-5.13.~~ In line with the ~~draft~~ London Plan, ~~we will expect that all new~~ development proposals must contribute to ~~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, or equivalent standards which may supersede these. 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

²⁸ Groups with protected characteristics are set out in the Equalities Act 2010.

through adaptable housing, ~~as set out in Policy HO5 (Accommodation for older people)~~

~~5.16.5.14.~~ 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.

~~5.15. To support our objectives for delivering inclusive communities, A~~ all development should be designed to promote social ~~interaction-integration, community cohesion~~ 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 ~~and external or perimeter gates~~.

~~5.16. Development proposals for new housing must be designed to maximise tenure integration and be 'tenure neutral'. The National Design Guide (2021) defines tenure neutral as: "Housing where no group of residents is disadvantaged as a result of the tenure of their homes. There is no segregation or difference in quality between tenures by siting, accessibility, environmental conditions, external facade or materials. Homes of all tenures are represented in equally attractive and beneficial locations, and there is no differentiation in the positions of entrances. Shared open or play spaces are accessible to all residents around them, regardless of tenure". Development proposals will be assessed having regard to the National Design Guide, or latest equivalent. Applications should clearly set out details of their approach to tenure neutral housing in the Inclusive Design Statement.~~

5.17. 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/refuse~~ proposals that unnecessarily restrict, ~~inhibit~~ 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

Commented [NE53]: Additional supporting text to support new 'tenure neutral' policy criterion linked to National Design Guide.

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. ~~Development proposals must use the design-led approach to secure a high quality public realm, must be designed and maintained to a high quality standard. It should help to~~ They must respond positively to the role of the public realm in contributing to local distinctiveness and ~~ensure supporting~~ 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.~~

Commented [NE54]: Picked up in D below

B. ~~Public realm should be delivered through the design-led approach, 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.~~

Commented [NE55]: Repetition - covered in QD1

~~B.~~ Development proposals must respond positively to ~~the movement and connective function of the public realm. They should be designed to enable and encourage movement by walking, cycling and the use of public transport, and also seek to reduce vehicular dominance and speeds. must be addressed to~~ Proposals must ensure that ~~development the public realm~~ provides for coherent relationships with surrounding buildings and land-uses, and good connections within and between sites and neighbourhoods, ~~as well as public transport, 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).~~

Commented [NE56]: Respond to consultation – design to not only enable but ‘encourage’ sustainable modes of transport

~~D.C.~~ Development proposals must address legibility and permeability of the public realm, both within a site as well as its immediate and wider surroundings. ~~This will require particular taking account of attention to~~ the movement patterns and desire lines ~~of people within, through and around the development an area.~~ Consideration should be given to the location of street crossings and other measures to promote safe access for all, such as ~~way-finding markers and signage,~~ external lighting, ramps, lifts, dedicated cycle lanes, bridges, underpasses and, where appropriate, railway arches.

Commented [NE57]: Repetition - covered elsewhere in plan

~~E.D.~~ Development proposals ~~will be expected to~~ must investigate and maximise opportunities to enhance ~~the movement and connective function of~~ the public realm by maximising opportunities to: ~~They should seek to:~~

a. Improve connections to existing or planned ~~strategic~~ transport and community infrastructure, including open space;

~~a-b.~~ Make provision for cycle parking infrastructure and bus stops;

c. 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;

~~b-d.~~ Integrate wider pavements, or widen pavements where these already exist; and

e. Avoid or remove barriers that unnecessarily impede or restrict movement and accessibility, and adversely impact on public safety; and-

~~e-f.~~ Integrate trees and other urban greening measures.

Commented [NE58]: Respond to consultation – request for specific facilities cited

Commented [NE59]: Respond to consultation – request for pavement widening to be included as a measure to support sustainable travel

Commented [NE60]: Respond to consultation – more emphasis on tree planting in public realm

~~E.~~ 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 proposals 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.

Commented [NE61]: Repetition – covered elsewhere in policy

~~F.~~

~~G-F.~~ Development proposals should deliver a vibrant public realm that promotes opportunities for relaxation, social interaction and physical activity for people of all ages and abilities. 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:

Commented [NE62]: Amended to support inclusive design principles

- 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-G.~~ 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 other Local Plan policies, 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

H.H. 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.

H.I. 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. Responds positively 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.

H.J. 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

H.K. Development proposals ~~will be expected to~~ must 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

Commented [NE63]: Policy supporting text amended throughout to make more concise and reduce repetition of points covered elsewhere in plan

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 approach. 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 of achieving~~ will help to secure inclusive and well-functioning spaces and places. Development should be designed and built to the human scale, for example, by integrating generous public realm, greening, building set-backs and articulations.

Commented [NE64]: Respond to consultation – request for design for 'human scale' to be covered in plan, as per QD1 amendment

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, with reference to other Local Plan policies. ~~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~~ There are significant opportunities to incorporate urban greening and sustainable drainage measures within the public realm, which development proposals will be required to investigate and maximise. ~~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,~~ Development proposals should be designed to prevent against the need for excessive site management requirements, ~~where appropriate.~~ For example, ~~opportunities should be taken to~~ the use of durable materials, ~~select~~ drought tolerant, perennial species for tree planting and other greening measures, ~~and create naturalised landscaping. These interventions may also~~ can provide a cost-efficient way to maintain a high quality public realm over the ~~lifetime of the development~~ long-term.

5.28. It is imperative that the public realm supports inclusive neighbourhoods and 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~~ refuse development proposals that seek to place inappropriate controls on the public realm, such as for public access and use, ~~to ensure it is genuinely and publicly accessible for all local residents and visitors to the Borough, whilst~~ It is recognising ~~recognised~~ there may be a need for reasonable measures to address liability, and public health and safety, ~~which will be considered on a case by case basis.~~ 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.

Commented [NE65]: Amended to make more definitive and to aid policy implementation

QD 4 Building heights

- A. The building height of development must respond positively 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);

Commented [NE66]: Respond to consultation - this policy will be subject to further review and likely revisions, which are pending outcomes of the Tall Buildings Study updates. Additional work on this study has been commissioned following a significant amount of public interest on this policy area during the Regulation 18 consultation. Further information is set out in the SDSC cover report.

- d. Preserve or enhance the significance of heritage assets and their setting; and
 - e. Will not result in adverse impacts on 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 5.1 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. 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 having regard to Figure 5.2, including the distinctiveness of Thames Policy Area, in line with Policy LNA4 (Thames Policy Area and Deptford Creekside);
 - d. Will not result in adverse visual, functional, environmental and cumulative impacts, having regard to 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 responds positively 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.

Figure 5.1: Tall buildings suitability plan

- 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.

Figure 5.2: Tall buildings sensitivity plan

- 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 and those with particular sensitivities, as set out in Figures 5.1 and 5.2 respectively. 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 approach 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.²⁹ 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 approach 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.

Figure 5.3: London strategic views and Lewisham local views

QD 5 View management

- A. Strategic views include significant buildings, urban landscapes and riverscapes. 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 the Borough's local distinctiveness. These strategic views, including their Protected Vistas, will be ~~designated and positively~~ managed positively in line with the London Plan and its 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 positively.
- C. Development proposals must not harm and, wherever possible, seek to make a positive contribution to the characteristics and composition of London Strategic Views and Lewisham Local Views, including their protected vistas and landmarks ~~elements~~. Development proposals 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 London Strategic Views, Lewisham Local Views and Local Landmarks will be assessed having regard to their contribution to preserving and enhancing local distinctiveness and:

Commented [NE67]: Respond to consultation - this policy will be subject to further review and potential revisions, which are pending outcomes of the Tall Buildings Study updates. Also, there is a need to consider local views suggested by the public as part of the consultation.

²⁹ Important Views and Tall Buildings: Maritime Greenwich, A World Heritage Site. Greenwich World Heritage Site Coordinator. 2006.

- 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 Policies HC3 (Strategic and Local Views) and HC4 (London View Management Framework).~~
- E. ~~Development proposals should use~~ the design-led approach ~~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 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 ~~includes policies to protect~~ London 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 policies framework~~ for managing these strategic views, with further guidance included in the Mayor's London View Management Framework (LVMF Supplementary Planning Guidance SPG), which ~~development~~ proposals should refer as appropriate. It is imperative that these panoramic views of London, and the key landmarks within them, are not compromised by new development and that ~~it is also important that development is managed so that the viewers people~~ can continue to experience and enjoy them.
- 5.42. There are also a number of important Lewisham Local Views ~~in Lewisham~~ that warrant protection and positive management. In addition, a number of Local Landmarks have been ~~identified designated~~ because they add to the distinctive character and quality of the ~~townscape the Borough~~ and provide points of visual interest. These Local Views and Landmarks are listed in Figure 5.3 and Part 5 of the Local Plan.
- 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 proposals 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. Development 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 Council is required to consult the London 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. Development proposals sited in the background of a Protected Vista must pay attention have regard 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.

QD 6 Optimising site capacity

A. Development proposals must make the best use of land by following the design-led approach demonstrate that the design-led approach has been used to optimise a site's the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham).

A.B. To establish the optimum capacity of a site consideration must be given to the appropriate development density 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

Commented [NE68]: This point has been addressed by A above, which in turn refers to the design-led approach and options appraisal set out in Policy QD1.

d. Capacity of infrastructure (~~including physical, environmental and social infrastructure~~) to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.

B-C. Development parameters for specific sites are set out in this Local Plan (Part 3 - site allocations). Where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to (A) and (B) above.

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. The delivery of Good Growth will necessitate that new developments use the Borough's - This means ensuring that the limited supply of land is used effectively and efficiently, whilst also improving the physical and environmental quality of places and spaces that people inhabit and use, along with the natural environment. 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 approach, development~~ Development proposals ~~will be expected to~~ must demonstrate how they will deliver the optimum capacity of a site. ~~The optimum capacity gives consideration to density, but it should not be taken as the maximum density. Rather, T~~ the optimum capacity is one that is derived through careful consideration of density taking into account the site's local ~~context and~~ character, the types of uses proposed, access~~ibility~~ to public transport and the infrastructure available to support the development. ~~The optimum capacity is not the maximum capacity or density. Development proposals We will normally require~~ should provide evidence of an options appraisal, undertaken at the early stage of the design process, which ~~has been used to inform the proposal and demonstrates~~ the approach to achieving the optimum capacity. This requirement may be applied ~~flexibility on case-by-case basis~~ flexibly, taking into account the location, nature and scale of development. For instance, for householder and other smaller developments ~~schemes~~, a planning statement ~~addressing the policy requirements~~ may be sufficient. ~~Applicants are advised to consult with the Council's Planning Advise Service for further information on the requirements for specific sites and schemes.~~
- 5.48. ~~The delivery of high quality development must begin with~~ Development proposals must demonstrate an understanding of a site's contribution to local character, in relation to its immediate and wider neighbourhood context. ~~This includes consideration of~~ the historical pattern of development, along with the existing and

Commented [NE69]: Respond to public consultation – to help address concerns about indicative site development capacities on site allocations, this additional criterion is included to aid effective implementation of the plan.

Commented [NE70]: Policy supporting text amended throughout to make more concise and reduce repetition of points covered elsewhere in plan

emerging urban-character of the locality. ~~Proposals are strongly encouraged to refer to~~The Lewisham Characterisation Study (2019)~~should be referred~~ at the early stage in the design-led approach. ~~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 a useful starting point for considering densities and 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 gradually ~~managed~~ 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 capacity 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 Good Growth~~The spatial strategy requires that new ~~and higher density~~ 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~~must demonstrate how they have responded to accessibility, ~~including by~~referring the latest Public Transport Accessibility Level (PTAL) maps (published by ~~Transport for London TfL~~), and also assessing opportunities ~~available for~~walking and cycling, 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 capacity of sites is realised,~~Development proposals should address both ~~the~~existing and future ~~transport accessibility levels~~PTALs of a site and its surrounding area. ~~Future accessibility should be considered in respect of~~taking account of planned improvements ~~and committed investments to~~ Lewisham's ~~the~~ network of 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~~PTALs over the long-term ~~(see Part 3 of the Local Plan)~~. 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 capacity 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, ~~higher-density~~ development within an area, ~~particularly higher density development,~~ may put

pressure on existing facilities and infrastructure or create additional demands. Development proposals should therefore assess and plan positively for infrastructure needed to support the densities sought. This includes but is not limited to transport, community, green and other environmental infrastructure. Planning contributions and/or legal agreements may be used to ensure that new development is appropriately supported by secure infrastructure, including community infrastructure in line Policy CI (Safeguarding and securing community infrastructure).

- 5.52. ~~Finally, t~~he optimum capacity of a site should ~~be determined with reference to~~ informed by the nature and mix of uses proposed. ~~For r~~esidential-led schemes ~~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 and genuinely affordable housing. ~~For e~~Commercial and industrial uses it is important that development helps to support our strategic developments objectives should seek opportunities for to intensifying uses on employment sites, particularly to deliver more jobs and new workspace. ~~Mixed-use schemes will require careful consideration of amenity for all users and activities.~~ 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 approach and to facilitate development that meets the Borough's growth requirements, support the delivery of Good Growth, and ensure densities are appropriate to their location, we will prepare planning Supplementary Planning Documents guidance focussed on specific locations and site typologies for specific areas. This includes guidance addressing the strategic the Catford Town Centre Framework and the A21 Corridor Development Framework. The and Lewisham's suburban areas, including small sites Small Sites SPD provides guidance to support the sensitive intensification of residential and other areas. All development proposals will be expected to refer this guidance to achieve the optimum capacity and to support delivery of Good Growth.~~

Commented [NE71]: Factual updates to ensure appropriate reference to Council's latest planning guidance

QD 7 Amenity and agent of change

- A. Development proposals ~~must~~ must ~~clearly~~ 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~~ noise and other nuisances will be mitigated and managed.
- B. ~~When considering the amenity impacts of new d~~Development proposals must comply with the Agent of Change principle will be applied in accordance with the draft London Plan.
- B-C. ~~Development proposals will be required to positively address amenity through~~ must use the design-led approach ~~in order to~~ protect and wherever possible enhance amenity by ensuring:

Commented [NE72]: This policy has been re-worked for legibility and to make the plan more concise. It consolidates the Amenity and agent of change policy together with those on noise (former QD8) and artificial lighting (former QD9). The policy principles are retained.

- a. ~~Make a~~ appropriate provision of privacy is made both for users of the development and those in neighbouring properties, ensuring development does not result in unreasonable levels of overlooking;
- b. ~~Ensure a~~ Adequate provision for ~~and seek to optimise~~ outlook, and demonstrate how this has been optimised for users of the development;
- c. ~~Ensure a~~ Adequate levels of ventilation, daylight, sunlight and open aspects including provision of private amenity space where appropriate; ~~and~~
- d. New noise sensitive development is sited away from existing noise generating uses and activities, or where this is not possible, providing adequate separation and acoustic design measures; and
- ~~e.e.~~ Green and open spaces are maintained as tranquil and quiet areas.
- 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.~~

Commented [NE73]: These policy points were moved from the former QD8 on noise

Commented [NE74]: This is now captured in criterion A above and elsewhere throughout the policy.

~~C.A. When considering the amenity impacts of new development the Agent of Change principle will be applied in accordance with the draft London Plan.~~

D. A Noise Impact Assessment and/or Vibration Impact Assessment will be required to must be submitted with proposals where they are applications for noise sensitive developments or developments likely to involve a significant noise or vibration generating use.

Artificial lighting

E. Development proposals must be designed to avoid adverse impacts of mitigate and manage light pollution at all stages of the development, or make provision for appropriate mitigation measures. Proposals will be required to demonstrate that external by ensuring that lighting is:

Commented [NE75]: Amended for consistency with London Plan

- a. Appropriate for its purpose in its setting;
- b. 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
- c. Energy efficient.

F. Where a dDevelopment proposals includes an element of public realm, it should contribute to creating a safe and attractive environment. should seek opportunities to enhance the function, safety and appearance of the public realm through the provision of sensitively integrated external lighting, where appropriate, having regard to (A) and (B)-(E) above.

Commented [NE76]: Amended for clarification and to aid policy implementation

Considerate construction

G. All new developments must make reasonable efforts to mitigate and manage traffic generation along with noise and other nuisances during the construction phase, and are encouraged to register with the Considerate Constructors Scheme or equivalent.

Major development proposals must submit a Construction Method and Management Plan.

Explanation

- 5.54. It is important that new development contributes to the delivery of Good Growth, ~~including~~ high quality and healthy living 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 contribute to the vitality of neighbourhoods.~~
- ~~5.55. The draft London Plan introduces~~ establishes 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 ensure the building or activity is designed to protect the existing residents or uses from noise. Whilst the Agent of Change principle deals predominantly with noise it also addresses other nuisances including vibration, odour, fumes, dust, artificial light and site waste. When considering the impact of new development, we will apply the Agent of Change principle in accordance with the criteria set out in draft London Plan Policy D12 (Agent of Change).
- ~~5.55-5.56. We will expect that all new development~~ Development must ~~protects~~ and wherever possible ~~enhances~~ local amenity. ~~Amenity should be central to using the design-led approach, with~~ Careful consideration should be given to site selection along with the layout, design, construction and operation of buildings and spaces, including the public realm, at the early stage. ~~Proposals~~ Applications must provide a sufficient level of information to demonstrate that potential impacts have been identified, assessed and avoided or appropriately mitigated. ~~We will resist~~ Where there will be ongoing and future management of mitigation measures, these may be secured by planning obligations or legal agreements. Proposals that are likely to cause unreasonable harm to the amenity of users of the development or occupants and uses in neighbouring properties will be refused.
- ~~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~~

Commented [NE77]: Respond to public consultation – request for policy to better manage impacts on amenity from construction activity

Commented [NE78]: The policy supporting text has been amended throughout to make more concise and to better align with the London Plan

~~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 and privacy. ~~Privacy is another key consideration and new development should not cause~~ 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 unimplemented~~ existing unimplemented planning consents or ~~strategic site allocations~~ policies.

5.58. Proposals will be expected to submit a Noise Impact Assessment and/or Vibration Impact Assessment where sites are located in high-noise areas or where a new development is likely to generate significant noise or vibration. 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.

5.59. 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.

~~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 occupants 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).~~

5.57-5.60. Noise generating cultural and community 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 to ensure established cultural and other venues such uses 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 town centres, Cultural Quarters and the Creative Enterprise Zone, where a critical mass of cultural venues and community facilities is necessary to support the Local Plan's strategic objectives.

~~5.58. 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.~~

~~5.59-5.61.~~ 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 **proposals** should recognise and respond positively 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.

Artificial lighting

~~5.62. Artificial lighting can play an important role in supporting safe, accessible and liveable neighbourhoods make a positive contribution to the quality of places. 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; and enhance the visual appearance of buildings and townscapes. If not appropriately managed however, artificial lighting has the potential to become light pollution which can present physiological, ecological and other environmental issues.~~

~~5.63. 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.~~

~~5.60-5.64.~~ Development should provide sensitively integrated lighting within the public realm to contribute to safe **and attractive** environments. This includes footpaths, cycleways and public open spaces and parking areas. However, ~~p~~Proposals will need to ensure that an appropriate balance is struck with managing safety requirements and **address** 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.

5.65. 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 8 Noise and vibration

~~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.~~

~~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.~~

~~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:~~

~~Internal and external noise levels can be satisfactorily controlled and managed; and~~

~~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).~~

~~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

~~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.~~

~~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 approach.~~

~~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~~

Commented [NE79]: This policy and its supporting text has been brought into the revised Policy QD7 Amenity and Agent of Change. Some policy points deleted to avoid unnecessary duplication.

~~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.~~

~~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.~~

~~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. 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:~~

- ~~a. Appropriate for its purpose in its setting;~~
- ~~b.a. 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~~
- ~~c.a. Energy efficient.~~

~~B.A. 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

~~5.61. 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.~~

~~5.62. 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~~

Commented [NE80]: This policy and its supporting text has been brought into the revised Policy QD7 Amenity and Agent of Change. Some policy points deleted to avoid unnecessary duplication.

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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.

~~5.63.1.1. 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 Area. 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.~~

~~5.64.1.1. Development should provide sensitively integrated lighting within the public realm to contribute to safe environments. This includes footpaths, cycleways and public open 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.~~

~~5.65. This policy is separate from statutory artificial lighting nuisance controls relevant to the Clean Neighbourhoods and Environment Act 2005 and Environmental Protection Act 1990.~~

HO 5 QD 8 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 proposals for housing should, must ensure provisions for adequately sized rooms and living spaces, with comfortable and functional layouts and along with well-integrated amenities. This includes development proposals for new-build housing development, changes of use, alterations and extensions.

B. Development 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

Commented [NE81]: This policy has been moved from its previous position in the Housing section (former reference Policy HO5)

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~~ the London Plan Policy D46 (Housing quality and standards) and corresponding Table 3.2, covering the detailed considerations for:

- a. Layout, orientation and form;
- b. Outside amenity space; and
- c. Usability and ongoing maintenance.

D. ~~Development proposals for housing development should~~ **must** be designed to be inclusive, accessible and safe to all, ~~having regard to the requirements of~~ **with reference to** Policy QD2 (Inclusive and safe design).

E. ~~Development proposals for housing development should~~ **must be designed to** protect and enhance amenity of building occupants, as well as that of adjoining site users and uses, in line with Policy QD7 (Amenity **and agent of change**).

F. ~~Development proposals for 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. ~~Development proposals for housing development should~~ **must** 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

5.66. Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. ~~We will seek to ensure that~~ **All new housing development, irrespective of tenure, is** **must be** designed to a high quality standard **and in order to** ~~meets~~ the diverse needs of Lewisham's resident population, **taking into account those who choose to live independently, families and others sharing accommodation, and those requiring managed support or care.** This includes new build housing, ~~as well as proposals involving the alteration or extension of existing housing units, as well as~~ **and the** conversion of other buildings into housing.

5.67. The quality and standard of housing is a key issue in Lewisham. One in four residents now live in the private rented sector, which is double that of 15 years

ago. We estimate that a quarter of private rented properties are non-decent. As further evidence, between January 2015 and October 2018 the Council received over 2,000 complaints about the condition of private rented properties. We inspected all these properties and found around half of them had poor energy efficiency (rating of D or below). Whilst the proportion of social housing units meeting the Decent Homes standard increased from 41% to 94% in the ten years from 2007, the Council's own research suggests private sector housing is not achieving the same level of standards.³⁰

5.68. We will apply the London Plan space standards when considering housing proposals (including for internal and outside space, communal amenity space and children's play space). We will also have regard to the qualitative design aspects set out in draft London Plan Policy D46, along with other Local Plan policies. Applicants are advised to refer the London Plan for further details. Development proposals must meet and should seek to exceed the minimum standards.

5.69. ~~Housing d~~Developments proposals ~~should seek to maximise the provision of genuinely affordable housing. They should also~~ must support mixed and inclusive neighbourhoods and communities by ensuring that housing of all tenure types are designed to a high quality standard and well-integrated, both within the site and development and with neighbouring residential properties. neighbourhood. Housing ~~should~~ must be designed to be 'tenure blind' so that affordable housing buildings and units are similar to market housing in design quality, including external appearance, with entrances and access routes that promote social inclusion. Communal amenity spaces must be accessible to all residents of the development, regardless of tenure.

5.70. Dual aspect dwellings with opening windows on at least two sides have many benefits for the amenity of building occupiers, including for daylight, outlook and natural ventilation. Single aspect dwellings do not offer the same benefits, particularly for natural ventilation, which is problematic in terms of climate change adaptation. Single aspect dwellings will therefore only be acceptable in exceptional circumstances, and should be avoided where they are north facing, contain three or more bedrooms, or exposed to noise and air pollution levels above which significant adverse effects on health and quality of life occur. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed.

QD ~~10-9~~ Building alterations, extensions and basement development

- A. Development proposals for building alterations, ~~and~~ extensions ~~and basements~~ must be ~~of a high~~ designed to a high quality ~~design~~ standard, and have regard to the Council's Alterations and Extensions SPD ~~(2019)~~.

³⁰ Lewisham Housing Strategy 2020-2026. Lewisham Council

B. Development proposals for building alterations and extensions ~~must respond positively to the context, character and distinctiveness of the site and host building.~~ ~~Proposals~~ will only be supported where they:

- a. Respect and complement the form, proportion, setting, period, architectural characteristics and detailing of the original building ~~and the site~~;
- 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.~~

Commented [NE82]: This is already covered in Policy QD1 and addressed in more detail in criterion a below

C. Innovative and contemporary designs will be supported where they are of an exceptional design quality and comply with (B) above. ~~Where proposals seek to integrate a contemporary design and/or materials, careful consideration will be required to ensure that the distinctive character and features of the original building are respected and not harmed.~~

Commented [NE83]: Amended to make more concise - this point is captured in B above.

D. New units or rooms created by a residential alteration or extension must ensure adequate ~~living and~~ amenity ~~and~~ space for all ~~building-intended~~ occupiers.

Basement development

~~E.~~ Proposals for basement development must ~~be accompanied by~~ include a Basement Impact Assessment ~~and~~.

~~E.F.~~ Basement development 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); whilst ensuring users of the development will be safe from all sources of flooding.~~
- 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~~.

Commented [NE84]: Respond to consultation – clarification required on safe design for basement development

~~F.G.~~ Where a ~~Proposals for~~ residential basement development extending ngs 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.

~~H.~~ Development proposals for basements including habitable rooms for residential use housing, 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.~~

~~G.~~ Development proposals for basements including toilets, bathrooms or other waste outlets must install an appropriate pumped device to protect occupiers and the property from sewer flooding.

Light wells

~~H.J.~~ Development proposals for light wells will only be supported where they must 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 will result in an excessive or harmful loss of amenity space will be resisted.

Explanation

~~Alterations and extensions~~

~~5.66-5.71. We want to ensure that the highest design quality is achieved through all new All new development, including building extensions, and alterations and basement developments must be designed to a high quality standard. This is particularly where this type of development is poorly designed and built it can have an adverse impact on local character, particularly where alterations or extensions are proposed to existing homes or on buildings of historic interest 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 The Council's Alterations and Extensions SPD (2019) should be referred as appropriate. This guidance document sets out clear principles and development guidelines to help householders and others to deliver high quality developments. that help to support implementation of the Local Plan. All proposals will be expected to refer to the SPD, as appropriate.~~

~~5.67. The Lowisham 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 approach 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.~~

Commented [NE85]: Respond to consultation – clarification on safe design for basement development

Commented [NE86]: Policy supporting text amended throughout to make more concise

~~5.68-5.72.~~ 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~~ responding to their established uniformity.

~~5.69-5.73.~~ Innovative, high quality and creative contemporary designs solutions that respond positively to the site context will be supported in principle, so long as the design should carefully consider the architectural language and integrity of the original building and its setting, and avoid ~~any~~ awkward jarring building forms that detract from local character.

Basement development

~~5.70-5.74.~~ 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 or living space ~~or accommodate larger families.~~ They also offer opportunities for ~~enable~~ 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 make extra operational space on existing premises. ~~Whilst recognising the role that basements can play in meeting the needs of the local population,~~ Basement development poses unique design challenges and it is important that these are appropriately considered and addressed. ~~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.~~

~~5.74-5.75.~~ Not all new basements will require planning consent ~~as there are~~ owing to permitted development rights ~~covering some types of development.~~ Where planning permission is required, ~~we will consider~~ proposals will be assessed against the Local Plan policies ~~to ensure new basement developments are appropriately integrated into the site and local area.~~ Particular ~~consideration~~ will need to ~~must~~ 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~~ must be addressed through ~~the~~ a 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~~ Pproposals will be ~~strongly resisted~~ refused where it cannot be demonstrated that harmful impacts ~~can~~ will be avoided or appropriately mitigated. Impacts on amenity should be minimised as much as reasonably practical during construction. Depending on the nature and scale of development a Construction Management Plan may be required, and this will be secured by condition or legal agreement.

~~5.72- 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.~~

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Light wells

~~5.73-5.76. 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 Careful consideration is required to ensure new light wells do not have an adverse impact on amenity, particularly including nuisance caused by 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 will 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 ~~11-10~~ Infill and backland sites, garden land and amenity areas

Key principles

- A. Development proposals 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 will not adversely impact on the amenity of neighbouring land uses and properties, including their rear gardens in site's immediate vicinity and surrounding area; and~~
 - The development has a clear urban design rationale, having regard to the Council's Small Sites SPD.
- B. Where ~~development on infill and backland sites, garden land and amenity areas is acceptable in principle, having regard to the requirements of~~ (A) above are satisfied, development proposals must:
- Be designed to a high quality standard and respond positively to the site context and local character, including historical character;
 - 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;
 - Retain trees and integrate high quality landscaping, in line with Policy GR3 (Urban Greening and Trees);
 - Ensure appropriate safe and convenient access for all users of the development;

Commented [NE87]: Respond to consultation – stronger criteria to ensure amenity is protected particularly for gardens

- ~~d-e.~~ Make adequate arrangements for ~~safe access and servicing the building and site, including by retaining and enhancing existing walking and cycle routes and access 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.

Commented [NE88]: Removed to make more concise – this point is covered elsewhere in the plan including QD7 Amenity and agent of change

~~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.

Commented [NE89]: Removed to make more concise – this is covered elsewhere in the plan.

Infill sites

~~D-C.~~ 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 character~~ 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-D.~~ 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;
- ~~d~~ Do not introduce gates or other design features that unnecessarily restrict or prevent public access to or through the site.

Commented [NE90]: Repetition – this is covered elsewhere in the plan as a principle that applies to all development

Commented [NE91]: Amended to aid policy implementation - there may be valid reasons to restrict access to part of all of some sites, mainly owing to public health and safety

Garden land (including back gardens)

~~F-E.~~ 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-F.~~ Development proposals that would will 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) and (B) above are satisfied.

Amenity areas

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

Explanation

~~5.74-5.77. 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 throughout the Borough to make a more beneficial use of land and improve the quality of local areas 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 New and sensitively integrated development on small sites can help to enhance local character, such as by repairing harmful breaks in street frontages through infill development or activating vacant backland sites, and provides new Small sites can also accommodate new housing, business space and other uses to meet local needs, as supported by policy HO2 (Optimising the use of small housing sites).~~

~~5.75-5.78. To help ensure that new development is designed to a high quality standard and responds positively to local character, this policy addresses the different types of small sites 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 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

Commented [NE92]: The policy supporting text has been amended throughout to make more concise

generally less secure environment as a result.

~~5.76-5.79.~~ These small site typologies cover the majority of sites that will require consideration under this policy (extensions and alterations are dealt with separately in this Local Plan). However, ~~it is recognised that~~ there may be some instances where a ~~particular~~ site will not fall definitively within any one of these categories. In such cases, the principles that will be applied for planning decisions will be taken from the appropriate parts of this policy. The Council will make a determination of the relevant policies, informed by the planning statement submitted by the applicant.

~~5.77-5.80.~~ 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~~ Development proposals must clearly demonstrate that the ~~development~~ site is appropriate for the proposed use(s), ~~and that~~ there is a clear urban design rationale for bringing forward development at ~~this the~~ location and there will be no adverse impact on amenity. This should be set out in the Design and Access Statement, and informed by the Council's Small Sites SPD and associated Small Sites Development Strategy document.

~~5.78. 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.~~

Commented [NE93]: Amended to refer Council's recently adopted Small Sites SPD and Development Strategy document

Commented [NE94]: Repetition – this is covered elsewhere in the plan

Infill and backland development

~~5.79-5.81.~~ All proposals for infill and backland development must ~~informed by~~ follow the design-led approach. ~~This will help to ensure that new development responds positively 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.

~~5.80-5.82.~~ Access and servicing requirements of backland sites ~~will be an important factor when considering development proposals~~ poses unique design challenges. Development proposals must ~~be designed to~~ ensure adequate arrangements for all vehicles likely to require access the site, including for emergency services, refuse and recycling collection and deliveries. Proposals must also ensure safe and convenient access to the site and buildings by walking and cycling.

~~5.84-5.83.~~ Development proposals ~~on infill and backland sites~~ should seek to ensure that existing walking and cycle ~~connections/routes~~, whether formal or informal, are retained and/or enhanced in order to ensure permeability with the rest of the neighbourhood, or where this is not possible, adequate replacement provision is made. Gated developments ~~are considered to be less secure due to the reduction of natural surveillance, and also adversely impact on site permeability and integration will be strongly resisted. It is also important that development does not result in a loss of security to adjacent dwellings.~~

~~5.82-5.84.~~ 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) this must comply with other Local Plan policies.~~ 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)

~~5.83-5.85.~~ 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.

~~5.84.~~ ~~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.~~

Commented [NE95]: Removed to make more concise

~~5.85-5.86.~~ 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.

~~5.86-5.87.~~ Proposals that ~~would-will~~ 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 12-11 Shopfronts

- A. Shopfronts (including their signs, canopies and security installations) must be designed to a high quality standard. ~~They should respond positively to and enhance the character of Lewisham's neighbourhoods and contribute to the creation of lively and safe environments. Development proposals for shopfronts will only be supported where they do not adversely impact on local character, amenity and public safety.~~
- B. Development proposals for new shopfronts or alterations to existing shopfronts ~~will be required to~~ must:
- 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;
 - Be of a proportion, scale and quality that responds ~~positively~~ to the character of the host building and, where relevant, adjoining properties;
 - Use high quality materials and colours that are sensitive to local character;
~~and~~
 - 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 contribute positively 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 respond positively 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 ~~host building and~~

Commented [NE96]: Amended to make more concise – this point is captured in QD1 and criterion B below

Commented [NE97]: Criterion H below amended, which covers this point

Commented [NE98]: Amended to make more concise – this is covered elsewhere in the policy and plan

Commented [NE99]: Amended for clarity and to aid policy implementation

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 for shopfronts must apply inclusive and safe design principles. They should retain, and wherever possible enhance, street level ~~doors~~ access and entrances, ~~including that provide~~ access to upper floor residential, commercial and community uses.

Explanation

~~5.87-5.88.~~ Lewisham's high streets and shopping areas, including their shopfronts, are an important and highly valued part of ~~the our local~~ neighbourhoods ~~in which they are located. They contribute to creating a sense of place and~~ 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.~~

~~5.88-5.89.~~ 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 be designed to a~~ high quality standard using materials ~~and incorporate designs~~ which are appropriate to the period and character of the building. ~~Particular e~~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, ~~for example. 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 and~~ Shopfront Design Guide Supplementary Planning DocumentSPD for further information.

~~5.89-5.90.~~ New-All 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.

~~5.90-5.91.~~ 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,

Commented [NE100]: The policy supporting text has been amended throughout to make more concise

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.

~~5.91-5.92.~~ Contemporary shopfront designs will be supported in appropriate locations.

All new and altered shopfronts should ~~be designed to be fully accessible for~~ ~~all~~ apply inclusive and safe design principles. 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.

~~5.92-5.93.~~ 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.

~~5.93-5.94.~~ 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, creating or perpetuating fears to personal safety. The use of open mesh security shutters and boxes is encouraged, ~~where~~ where such ~~interventions~~ measures 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.

~~5.94-5.95.~~ Development proposals ~~Where for~~ mixed-use schemes ~~involve~~ involving the creation of a new shopfront, ~~development proposals will be required to~~ must provide a reasonable shopfront fit out, having regard to viability. This ~~is~~ is ~~particularly important to~~ will 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~~ Proposals should therefore provide appropriate level of shopfront design detail ~~at the initial application stage, and to ensure high quality design sensitive to the surrounding context.~~

QD ~~13-12~~ 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:
- There is no adverse impact on local character, appearance or visual amenity on the site or surrounding area;
 - Heritage assets and their setting and preserved or enhanced;
 - 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

Commented [NE101]: Policy supporting text amended throughout to make more concise

~~5.95-5.96.~~ Outdoor advertisements, digital displays and hoardings are a means of providing information to the public and can play a complementary role in supporting the local economy. ~~However the physical quality of places, including streetscapes and townscapes, can be compromised by displays that are poorly sited, designed and maintained installations can have an adverse impact on public health and safety, amenity and local character. We will seek to ensure that all such development is designed to a high quality standard 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 respond positively to local character as well as contribute to and secure safe, accessible and attractive environments.~~

~~5.96-5.97.~~ Advertisements, digital displays and hoardings are regularly located on or adjacent to the public realm. ~~Particular care is needed. To ensure that everyone can move uninhibited movement along safely and easily within it, development must apply inclusive and safe design principles 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. Where installations are proposed to be located. Proposals for advertisements on or adjacent to the Transport for London Road Network will be required to consult Transport for London TFL should be consulted for an opinion on the impact on the safe operation of the highway network.~~

~~5.97-5.98.~~ ~~Where poorly designed and sited, outdoor advertisements, digital displays and large hoardings can have an adverse impact on local amenity. In the interests of protecting amenity proposals must address the impact that installations will have on surrounding uses and properties and the quality of the public realm. For example, For example, development should they cannot obscure the views of occupants inside buildings, obscure elevations which contribute to the appearance of the townscape 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. Proposals should maximise opportunities for hoardings should seek to add visual interest while they are in place, such as by incorporating public art.~~

5.98. ~~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.~~

5.99. Applications for advertisements and hoardings are required to follow the Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6 Heritage

What you've told us

Heritage is important because:

- ~~It gives neighbourhoods their unique character and identity.~~
- ~~Residents and visitors enjoy historic high streets~~

Concerns the historic environment is being damaged by:

- ~~Demolitions and new developments~~
- ~~Small works such as house extensions~~
- ~~Building on back gardens~~

More should be done to improve the historic environment by:

- ~~Supporting heritage projects~~
- ~~Better preserving the special qualities of places outside of Conservation Areas~~

What we've learned

Lewisham has a rich historic environment

- ~~It features 29 conservation areas, 364 nationally listed buildings and structures, 301 locally listed buildings, 1 scheduled ancient monument and 2 registered gardens and parks.~~
- ~~Part of the buffer zone for the UNESCO Maritime Greenwich World Heritage Site is located at Blackheath.~~
- ~~Lewisham has a unique maritime and industrial heritage, and was once home to the Royal Naval Dockyard.~~

Heritage at risk

- ~~There are buildings and other assets on the 'Heritage at Risk' register due to neglect, decay or other threats.~~

Main Issues

Understanding heritage

~~Our heritage assets are irreplaceable. Their value must be understood if they are to be preserved for future generations.~~

Enabling growth, preserving heritage

~~There is greater pressure to redevelop land and buildings to meet needs for homes and jobs. Lewisham's growth must be managed in a way that is sensitive to and preserves local heritage.~~

~~Heritage at risk~~

~~The heritage value of some buildings (and other assets) could be lost if action is not taken to secure their long-term future.~~

~~We're proposing to...~~

~~Preserve and enhance the historic environment~~

- ~~• Ensure developments respect the value of heritage assets and their setting — this includes buildings, townscapes and landscapes.~~
- ~~• Require developers to submit a 'Heritage Statement'~~

~~Promote local heritage~~

- ~~• Work with our partners to put heritage at the heart of regeneration projects.~~
- ~~• Identify 'Areas of Special Local Character' to preserve the special qualities of neighbourhoods outside of conservation areas.~~

~~Prevent the loss of heritage assets~~

- ~~• Allow for 'enabling development' in exceptional cases. Meaning we may permit some harm to the heritage value of a building (or other asset) to secure its long term future, but only where there is public benefit in doing so.~~

~~<Did you know?>~~

~~Lewisham is gaining recognition for its award winning heritage projects. Recent examples include the restoration of the Fellowship Inn, in Bellingham, and improvements to Beckenham Place Park.~~

Commented [NE102]: Not required for Regulation 19 plan

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:
- Collaborating with stakeholders to identify, assess, monitor and review heritage assets and understand their importance to both the Borough and the nation;
 - Celebrating Lewisham's historic environment and ensuring that it is central to reinforcing sense of place and place making;
 - Ensuring the significance of the Borough's heritage assets is fully understood, positively valued and that their contribution to sustainable neighbourhoods and communities is recognised, including by preparing a Heritage Strategy;
 - Requiring that heritage meaningfully informs the design of development proposals, and only supporting development that preserves or enhances the significance of heritage assets and their setting;
 - Promoting heritage-led regeneration and urban renewal ~~where this ensures that new developments as a means to~~ 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.

D. Where a development proposal conflicts with the Development Plan but will secure the preservation of a heritage asset that is otherwise not financially viable to repair, the Council will assess whether the benefits of the proposal outweigh the disbenefits of departing from those policies.

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~~The Local Plan seeks to ensure 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

Commented [NE103]: Respond to consultation – standalone Policy HE 4 on 'enabling development' deleted on request of Historic England, however officers consider there is merit in retaining a criterion for this matter to ensure all such proposals considered in line with HE's standing guidance (as set out below in supporting text). The criterion is included here.

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 respond positively 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. The quality, accuracy and comprehensiveness of the heritage statement will be considered in the determination of planning applications.
- 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 complying with other policies in this plan. Heritage should be considered as an integral component of sustainable neighbourhoods and 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.

Commented [NE104]: Included to aid implementation of the policy

- 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.
- 6.14. The NPPF sets out policies for 'enabling development'. This is a term specifically used for cases where the cost of repair - and conversion to optimum viable use, if appropriate - of a heritage asset exceeds its market value on completion of repair or conversion, allowing for appropriate development costs (termed a 'conservation deficit'). In these cases development proposals which depart from the Development Plan and would normally be considered unacceptable may be permitted in order to secure the conservation of the asset.
- 6.15. Enabling development should not harm the heritage asset it is intended to conserve. The Council will expect that measures have been fully explored and undertaken prior to considering enabling development. This may include maintenance, repair and decay-prevention measures, grant-funding for repairs and reuse, transfer of ownership to a building preservation trust or similar charity.

and other sympathetic measures. Development proposals for enabling development must submit full financial viability details and will be assessed having regard to the criteria set out in Historic England's advice note GPA4 Enabling Development and Heritage Assets (2020).

Commented [NE105]: Additional supporting text to make clear how the Council will consider applications for enabling development – see amend to criterion D above

Figure 6.1: Conservation Areas and World Heritage Site Buffer Zone

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 ~~the~~ the Site's 'Outstanding Universal Value', ~~as well as including~~ 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 development proposals ~~for new development~~ (including alterations and extensions to existing buildings) will only be supported where they:
- Preserve or enhance the special character and appearance of the Conservation Area having particular regard to:
 - Townscape, buildings, rooflines and the relationships between buildings;
 - Plot coverage and open spaces, including gardens;
 - Scale, form, elevational hierarchy, fenestration pattern, ornamentation and materials;
 - Trees, topography, boundaries and other landscape features; and
 - Views, from the public and private realm, including streetscape views and views across rear gardens and public open spaces;
 - 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. Development pProposals 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 only be supported where they will complement and positively impact on the character and significance of the area.
- E. Development proposals involving tThe demolition of buildings or structures that make a positive contribution to the character or appearance of a Conservation Area will be resisted.

- F. Development proposals 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. Development pProposals 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 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. Development pProposals that would 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

~~6.13.6.16.~~ 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.

~~6.14.6.17.~~ 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.

UNESCO has identified the main threats to the World Heritage Site, which include development pressures within the town that could impact adversely on its urban grain and from tall buildings, in the setting, which may have the potential to impact adversely on its visual integrity. The Buffer Zone is therefore considered inappropriate for tall buildings. The London Plan states that further planning guidance will be prepared on settings and buffer zones, which will support implementation of this policy.

Commented [NE106]: Additional information to aid policy implementation.

Conservation Areas

~~6.15.6.18.~~ 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.

~~6.16.6.19.~~ 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.

[6-17-6.20](#). 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.

[6-18-6.21](#). 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.

[6-19-6.22](#). 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

[6-20-6.23](#). 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.

[6-21-6.24](#). 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).

~~6.22-6.25.~~ 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.

~~6.23-6.26.~~ 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

~~6.24-6.27.~~ 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.

~~6.25-6.28.~~ 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.

~~6.26-6.29.~~ 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 20th 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

~~6.27-6.30.~~ 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.

Figure 6.2: Non-designated Heritage Assets

HE 3 Non-designated heritage assets

Locally listed buildings and other non-designated assets

- A. Development proposals will only 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~~refused.
- 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~~must:
 - a. Preserve the characteristics that contribute to the area's significance, which may include 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 special local character.

Archaeology

- E. Development pProposals 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. Development pProposals on sites that lie within or adjacent to an APA must be accompanied by an Archaeological Assessment, which should be submitted as part of the Heritage Statement. 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~~must 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. Proposals for sSubterranean 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

~~6.28-6.31.~~ 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.

~~6.29-6.32.~~ 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.

~~6.30-6.33.~~ Areas of Special Local Character are places where there is a coherent local character, often based on townscape, architecture and spatial qualities. Their significance will normally rest on the combined qualities of groups of elements~~Individual buildings within the area will usually be of interest in the way that they contribute to the whole, rather than for their own individual features the~~

value of the elements taken individually. Twelve Areas of Special Local Character are currently recognised, as set out in Schedule 3, having been identified in previously adopted documents.³¹ These areas will, ~~from time to time~~, be assessed against Historic England's guidance for conservation area designation and, if they are of sufficient historic or architectural interest, will be consulted upon and adopted as Conservation Areas. If they do not meet the level of interest expected for ~~C~~onservation ~~A~~rea designation but still demonstrate other aspects of local interest (for instance artistic, landscape, social and cultural) they will nonetheless continue to be considered of special interest to the Borough and will remain identified as Areas of Special Local Character. Selection criteria for assessing potential new Areas of Special Local Character will be adopted by the Council in due course, and any proposed new areas will then be assessed against them.

Identifying heritage assets.

~~6.31-6.34.~~ 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.

~~6.32-6.35.~~ 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

~~6.33-6.36. 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. The areas of greatest known archaeological interest or where there is above average potential for new discoveries are identified by Archaeological Priority Areas (APAs). Lewisham's APA boundaries date from the 1970s-1980s and do not predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future, as required by NPPF.

Commented [NE107]: Respond to consultation – following request for new areas of special local character to be designated, this sets out information about ASLC and the approach to any future designations

³¹ The Council's Development Management Local Plan (2014) and preceding documents.

They will be reviewed and updated in due course by Historic England and a London-wide standardised approach, as defined within London Plan paragraph 7.1.10 will be used which assigns all land in the borough to one of four tiers denoting different levels of sensitivity to development, using an 'archaeological risk' model. Therefore developers should consider the potential for archaeological discoveries both within and outside the existing APA boundaries.

Commented [NE108]: Respond to consultation – factual updates including on the AAP review process for Lewisham

~~6.34-6.37.~~ 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.

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:~~
- ~~a. Will not materially harm the heritage values of the asset or its setting;~~
 - ~~b. Avoids detrimental fragmentation of management of the asset;~~
 - ~~c. Will secure the long-term future of the asset and, where applicable, its continued use for a sympathetic purpose;~~
 - ~~d. 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;~~
 - ~~e. Is not otherwise viable owing to insufficient subsidy is not available from any other source; and~~
 - ~~f. 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

~~6.35. 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.

6.36. 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.

6.37. 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.

6.38. 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.

Commented [NE109]: Respond to consultation – standalone policy on enabling development deleted at request of Historic England. However, officers consider there is a merit in retaining a policy point which has been incorporated into HE1.

7 Housing

What you've told us

Housing costs are a concern because:

- They are too high
- There are not enough affordable homes
- Developers say financial viability is important when deciding the amount of affordable homes built on a site

More and better quality housing must be provided for specific groups, including:

- Homeless people and other vulnerable groups
- Students
- Families with children

New housing development must be carefully managed to ensure:

- There are enough services and community facilities to cope with extra demands
- There is no harm to local character and the environment
- Suitable controls over houses in multiple occupation (HMOs)

What we've learned

Good track record of delivery

- The Council has regularly met its housing targets over the past decade.

Housing costs are rising quickly

- Average house prices in Lewisham are more than 10 times the average workplace earnings
- In 2018, the median household income was under £20,000, the 3rd lowest in London
- Social rented homes are the only housing that remains genuinely affordable for the majority of people in Lewisham

Private rented sector is growing

- 1 in 4 residents in Lewisham live in the private rented sector — double that of 15 years ago.
- Private rents rose by more than 50% between 2011 and 2017.

Housing mix and quality

- Most new private housing built is with 1 and 2 bedrooms.
- In September 2019, almost 5,100 families on the housing register were living in an overcrowded home and in need of a larger one.
- There has not been a large rise in HMOs, but the location of HMOs has shifted to the south of the Borough, with large clusters in Bellingham, Downham and Whitefoot.
- Most social housing units meet the Decent Homes standard. Our research shows private sector housing is not achieving the same level of standards

Viability

- Our research shows that small housing schemes (less than 10 units) could make a contribution to affordable housing.

Main Issues

Affordability

The gap between earnings and housing costs is quickly widening.

A growing population

Many more homes are needed for our growing population. The draft London Plan sets a new housing target for Lewisham of 1,667 net units a year, and the Government's target is much higher. Growth on this scale will have to be properly managed.

Different housing needs

Lewisham's diverse population has many different housing needs that must be catered for.

Design Quality

The standard of accommodation varies across Lewisham. Measures are needed to ensure everyone has access to a decent and secure home.

HMOs

HMOs are part of the housing mix that helps to meet local need. This type of development must be carefully managed to ensure housing units are fit for purpose, and to protect the amenity of neighbourhoods.

Overcrowding

There are a large number of families on the housing register in need of a larger home.

We're proposing to...

Secure more genuinely affordable homes

- Set a target of 50% of all new homes built to be genuinely affordable (based on local income levels). In Lewisham, this is social rent or 'London affordable rent'.
- Maximise affordable housing on new schemes, including small developments (less than 10 units)

Boost housing delivery

- Meet and exceed the London Plan housing target – by delivering most new homes on large sites we have identified, and elsewhere through the sensitive intensification of neighbourhoods
- Protect against the loss of housing, including social housing
- Use powers available to bring vacant homes back into use

Tailor housing to local communities

- This includes older people, students and those who require specialist support.
- Protect family homes and seek that family units are built in new housing schemes.
- Improve controls over HMOs
- Ensure affordable housing is built to a high quality standard with equal access to amenities, such as play space, regardless of tenure.

We've also considered

- Using the standard definition of affordable housing (which does not account for local income levels).
- Whether affordable housing contributions from small schemes impacts on their financial viability.
- Allowing conversions of family homes into flats, with no requirement to retain a family-sized unit.

Commented [NE110]: Not required for Regulation 19 plan

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 for the Borough of 16,670 net housing completions over the period 2019/2020 to 2028/2030 (or 1,667 net completions per year) is met and exceeded; ~~and~~
 - ~~b. That delivery against Lewisham's Local Housing Need figure is maximised.~~
 - b. The delivery of at least 25,005 net housing completions over the 15-year period from the start of the local plan, 2020/2021 to 2034/2035 (or 1,667 net completions per year).
- B. The Council will keep under review the Local Plan's strategic housing target and performance against the delivery of this. Where changes to the London Plan ~~policies are made, including the strategic~~ borough-level housing targets are made, the local plan review process will be used to ensure Lewisham's ~~Local policies-Plan~~ Local Plan remains in general conformity with the London Plan.

Commented [NE111]: Respond to public consultation – removed following the publication (adoption) of the London Plan (2021), which sets the Borough's strategic housing requirement.

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 housing development to Opportunity Areas, Growth Nodes, Regeneration Nodes, strategic Growth eCorridors, town centres and other well-connected and sustainable locations, consistent with the spatial strategy for the Borough, ~~in line with~~ set out in Policy OL1 (Delivering an Open Lewisham);
 - b. Allocating strategic sites for new housing ~~development~~, including mixed-use development, and supporting development proposals where they comply with the site allocation requirements and resisting proposals that are at odds with these;
 - c. Facilitating the sensitive intensification of established 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 net gains in affordable housing wherever possible;
 - e. Ensuring that all development proposals make the best use of land and optimise the capacity 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~~ Refusing development proposals that ~~would will~~ result in the net loss of housing unless:

Commented [NE112]: Amended for consistency with the spatial strategy for the Borough – see Policy OL1

Commented [NE113]: Amended for clarity and to aid policy implementation

Commented [NE114]: Amended for clarity and to aid policy implementation

- i. It is suitably replaced at existing or higher densities with at least the equivalent ~~level amount~~ 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.
- h. ~~Ensuring the Borough's housing target aligns~~ Working with stakeholders and delivery partners with the expected to ensure the phasing of development corresponds with the delivery of infrastructure required to support it and to speed up the rate of delivery of new homes where planning consent has been granted.

Commented [NE115]: Amended to better reflect outcomes of the Council's recent Housing Delivery Action Plan

Inclusive and mixed neighbourhoods and communities

~~D.~~ ~~All~~ Development proposals for housing ~~development~~ must demonstrate how they will contribute to and support inclusive and mixed neighbourhoods and communities across Lewisham. ~~Details should be set out in the Inclusive Design Statement which must be submitted in accordance with Policy QD2 (Inclusive and Safe Design).~~

Commented [NE116]: Respond to consultation and Member feedback – greater emphasis on inclusive design. See also amendments to Policy QD2

~~D-E.~~ Development proposals ~~will be required to~~ must deliver an appropriate mix of housing within the site and locality area. The appropriate mix should be established having regard to ~~individual the site's location circumstances (including location, and character, and the 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 Table 7.1;~~
- d. The need for provision of family housing units (3+ bedrooms), with ~~an element of such provision reasonable proportion of family units expected~~ to be delivered on ~~schemes major~~ developments of 10 or more dwellings; and
- e. The delivery of sustainable neighbourhoods that are appropriately supported by community facilities and other ~~strategic~~ infrastructure.

Commented [NE117]: Respond to consultation – stronger requirements for family housing; plan amended to set specific targets on affordable products, informed by SHMA update 2021

Commented [NE118]: Respond to consultation – stronger requirements for family housing; plan amended to make clear a 'reasonable' proportion of family units required on major private schemes

~~E-F.~~ Development proposals ~~will be resisted where they~~ comprise ~~ing~~ solely of studios and/or 1 bedroom, 1 person units, or ~~which will~~ result in an overconcentration of 1 or 2 bedroom units on a site or locality, ~~will be refused~~ unless it can be ~~suitably~~ demonstrated that the ~~housing~~ provision:

Commented [NE119]: Amended to reflect infrastructure not limited to 'strategic' and can include other non-strategic types vital to sustainable neighbourhoods

- a. Is located in an area that benefits from high ~~levels of Ppublic T~~ transport Accessibility Levels; and
- b. Forms part of a larger development that includes ~~an~~ appropriate amount of provision for a ~~wider~~ mix of unit sizes, including ~~a significant amount of~~ family size units; or

- c. Is sited in a locality area that ~~benefits from good provision~~ consists predominantly of ~~larger and family size housing~~ 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.

Commented [NE120]: Amended for clarity and to aid effective implementation

Housing choice

F.G. To help ensure that local residents and other people 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 development 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~~ people with a local connection before advertising them more widely to others.

Commented [NE121]: Amended to reflect the wider scope of people who may have a local connection to the Borough (e.g. family). The Council exercises no planning control in this respect but will encourage agents to support the approach.

Commented [NE122]: Information pending SHMA 2021 update

<u>Table 7.1 Target unit size mix for affordable housing</u>			
<u>Tenure type</u>	<u>1 and 2 bed</u>	<u>3 bed</u>	<u>4 or more bed</u>
<u>Social / London Affordable Rent</u>			
<u>Intermediate</u>			

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 ~~for the period 2019/2020 to 2028/2029~~ is 16,670 net housing completions (or 1,667 net completions per year). ~~The London Plan does not set housing targets past this period however it provides a direction for borough local plans where targets are needed beyond 2029.³² In light of this direction and local evidence on land availability, it is considered appropriate for the Local Plan to 'roll-forward' the borough's London Plan annual housing target. This will also ensure that the NPPF requirement to identify land for homes is satisfied.³³ Accordingly, the 15-year target from the start of the plan period 2020/2021 – 2029/2035 is 25,005 net housing completions (or 1,667) net completions per year.~~

Commented [NE123]: Factual updates following publication of new London Plan

~~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 there are exceptional circumstances to justify the use of another method.³⁴ 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 provided that the draft London Plan would be 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~~

³² London Plan (2021), paragraph 4.1.11 states that "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.

³³ NPPF (2020), paragraph 68 provides that the Local Plan should identify specific, deliverable sites for year 1-5 and specific developable sites for years 6-10 and where possible years 11-15.

³⁴ NPPF (2019), paragraph 60.

~~need figure of 1,939 net units per year based on the 2016 London Plan target. The LHN figure is 2,344 net units per year based on the draft London Plan (Intend to Publish version) annual housing target of 1,667 units. These LHN figures are significantly higher than Lewisham's strategic housing target set out in both the current and draft London Plan.~~

Commented [NE124]: Removed following publication of new London Plan

~~7.5.7.3. 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 preparation of the Local Plan the Council has undertaken an assessment we have undertaken a number of exercises including to identify sources of land that may be suitable and available for housing development, including:~~

Commented [NE125]: Removed following publication of the new London Plan

- 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 developable³⁵, including through engagement with land owners, ~~in the early stages of during the plan's~~ preparation;
- 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.

~~7.6.7.4. Through the above ~~exercises, assessment~~ we have identified specific large sites which have the potential capacity to deliver approximately 25,000 net new homes. When combined with trend-based windfall delivery rates in the Borough, there is sufficient capacity to meet and exceed the ~~draft~~ London Plan housing target over a 15-year period ~~plus an appropriate buffer~~³⁶; however the phasing of development will be an important consideration. ~~Meeting the NPPF Local Housing Need figure poses a significant challenge, given Lewisham's unique circumstances,~~~~

³⁵ Deliverable and developable as defined by NPPF (2021), paragraph 67.

³⁶ ~~In line with NPPF (2021) paragraph 74 a 5% buffer has been applied to ensure choice and competition in the market for land (this is moved forward from later in the plan period).~~

particularly ~~There is a critical~~ -need for strategic transport infrastructure, ~~particularly the Bakerloo line extension~~, to unlock the development potential of areas, and to optimise the capacity of sites. ~~A Housing Trajectory is included in an Appendix to the Local Plan which sets out details on the expected phasing of housing delivery over the plan period.~~

Commented [NE126]: This is an NPPF requirement – officers are currently working on the trajectory, taking into account consultation feedback (e.g. discussions with landowners on phasing)

~~7.7.7.5.~~ For the purpose of monitoring housing completions, ~~we will consider~~ net changes on conventional and non-conventional forms of housing ~~will be calculated~~ 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 according to the indicative capacities and timeframes set out.~~

~~7.9.~~ ~~In addition, through the Duty to Cooperate we are taking the opportunity to continue engaging with neighbouring and other planning authorities to understand whether they are, or will be, in a position to assist in accommodating any residual local housing need arising in Lewisham 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 'stopped 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), the rate of housing delivery experienced locally, 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~~

Commented [NE127]: Not required for Regulation 19 plan

~~7.12-7.6.~~ 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 brownfield sites ~~via including those for which~~ site allocations ~~have been prepared~~. All such routes ~~to housing delivery~~ relate to the spatial strategy for the Borough, which aims to direct development in support of Good Growth. 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 neighbourhoods and communities

~~7.13-7.7.~~ Lewisham is a diverse Borough comprising of many vibrant and distinctive neighbourhoods and 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~~The Council is committed to achieving inclusive and mixed communities, ~~particularly in a way that is targeted at~~ addressing the ~~underlying causes of deprivation~~environmental, social and economic barriers adversely affect peoples' lives. 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 neighbourhoods and communities. This policy sets the strategic approach for securing an appropriate mix of housing when new development comes forward.

~~7.14-7.8.~~ There is a significant and acute need for more genuinely affordable housing in the Borough, as set out in the London Strategic Housing Market Assessment (2017) and Lewisham Strategic Housing Market Assessment Update (201921). Consistent with the ~~draft~~ London Plan, ~~we will seek that~~ development proposals must contribute towards the Borough's strategic target of 50 per cent of new homes to be genuinely affordable. Residential development proposals ~~will be expected to~~must 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 delivered by the Council through its housebuilding programme and by 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.

Commented [NE128]: Amended to refer latest technical evidence

~~7.15-7.9.~~ Development proposals 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~~Development

proposals for major residential development ~~will be expected to~~ **must** make provision for ~~an element~~ **a reasonable proportion** of family housing units, the amount of which will be considered on a case-by-case basis taking into account **financial viability**. Minor development proposals of less than 10 units incorporating family sized units will be considered favourably. ~~We will seek to resist against~~ **Development** proposals ~~involving should not normally result in~~ the loss of family sized units (including through demolition and redevelopment); ~~further details on the conversion of family housing is set out in Policy HO2 (Optimising the use of small housing sites).~~ ~~For~~ **Where** development proposals include an element of affordable housing, ~~proposals should have regard to the recommended the~~ unit size mix ~~set out in the Council's Housing Strategy, or the Council's latest evidence base on housing need~~ **should be established with reference Table 7.1**. All development proposals will be expected to demonstrate how the dwelling size mix is appropriate to the site in contributing to inclusive and mixed neighbourhoods and 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.~~

Commented [NE129]: Included for clarification and to aid policy implementation.

Commented [NE130]: Included for clarification – HO2 allows for conversion of family homes but only where a family sized unit (3+ bed) is retained

Commented [NE131]: Respond to public consultation – request stronger requirements for family housing; plan amended to set specific targets on affordable products, informed by SHMA update 2021

Commented [NE132]: Repetition – re-stating policy and also covered elsewhere in plan

~~7.46-7.10.~~ To help secure inclusive and mixed neighbourhoods and communities, we will resist **development** proposals that comprise solely of studios and 1 bedroom, 1 person units or those that ~~would will~~ result in an overconcentration of 1 or 2 bedroom units on a site or **locality area**. 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 **such** provision would demonstrably enhance the mix and balance of housing unit types within a **larger development site or locality area**. 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, **development** proposals for studio units may be permitted where they are of an exceptional design quality, minimum space standards are satisfied and the development is appropriately located, in a **well-connected and** highly accessible location that benefits from good provision of local amenities.

Housing choice

~~7.47-7.11.~~ 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 neighbourhoods and communities. We will generally support proposals that enhance housing choice and access **to genuinely affordable housing in Lewisham 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 needs of different 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), including those who require specialised forms of housing. Further details are set out later in this section.~~

Commented [NE133]: Amended to make more concise

~~7.18-7.12. 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 development proposals for such applying innovative and contemporary housing designs where they comply with other Local Plan policies. On-Development proposals for housing involving as a 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 will be considered with reference to Policy EC22-DM5 (Meanwhile uses).~~

Commented [NE134]: Amended to make more concise

~~7.19-7.13. Those with a connection to Lewisham, including people currently living or working locally or with family connections 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, UK citizens and others with a strong connection to the Borough, 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 Housing conversions, having regard to Policy HO2-E below;~~
 - ~~Residential Housing alterations and extensions, having regard to Policy QD10 (Building alterations, extensions and basement development); and~~
 - ~~Infill and backland 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 ~~has prepared a suite of supplementary planning documents, the Small Sites SPD and the Alterations and Extensions SPD.~~ Development proposals ~~will be expected to must~~ have regard to this ~~planning~~ guidance, where relevant, and demonstrate how it has been used to inform the ~~development through the~~ design-led approach.
- C. Development proposals for housing on small sites will ~~only~~ be supported where they help to facilitate the delivery of the spatial strategy for the Borough and:

Commented [NE135]: References to other Local Plan policies removed to make more concise – the plan must be read as a whole

Commented [NE136]: Factual updates to refer Council's adopted planning guidance.

- a. Are appropriately located for residential use;
- b. Are ~~designed to aof a~~ high quality ~~standard design~~ with accommodation that meets the relevant standards for ~~private internal and outdoor living and amenity~~ space, ~~having particular regard with reference~~ to Policy ~~HO5-QD8~~ (High quality housing design);
- c. Respond positively to local character, including historical character ~~and heritage assets~~;
- d. Protect and enhance biodiversity and green infrastructure, and further maximise opportunities for urban greening;
- e. ~~Contribute towards the delivery of~~ ~~Make provision for~~ affordable housing, in line with Policy HO3-~~1~~ (Genuinely affordable housing);
- f. Protect and do not adversely impact on local amenity;
- g. Do not result in the loss of community infrastructure, ~~having regard with reference~~ to Policy C11 (Safeguarding and securing community infrastructure); and
- h. Do not prejudice the delivery of ~~strategic~~ site allocations ~~in the Local Plan~~.

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, ~~development~~ 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:
 - a. The gross internal floor space of the existing dwelling is 130 sq. metres or greater;
 - b. 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;
 - c. 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 with reference to other policies on~~ high quality design;
 - d. In the situation garden land ~~or other outdoor amenity space~~ is available, ~~the extent of and~~ access to this private amenity space is maintained for the existing family unit, and wherever possible, made accessible to residents in other units;
 - e. ~~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~~
 - f. The development ~~would will~~ not result in an adverse impact on local character ~~and townscape~~.

Commented [NE137]: References to other Local Plan policies removed to make more concise – the plan must be read as a whole

- F. **Development p**Proposals for the conversion of properties into Houses in Multiple Occupation will be considered against Policy HO-8-8 (Housing with Shared Facilities - Houses in Multiple Occupation).

New Figure - Small Sites Housing Opportunities

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.~~

~~7.21-7.14.~~ 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 housing target.

~~7.22-7.15.~~ 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.

Commented [NE138]: To be included - London Plan requires that small sites areas are identified in Local Plan. This will be the same map as on Page 19 of Council's adopted Small Sites SPD.

Commented [NE139]: Removed to make more concise. Further information on small sites also set out in London Plan.

~~7.23-7.16.~~ 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-established~~ 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).

~~7.24-7.17.~~ Our approach to housing development on small sites is expected to facilitate the incremental intensification of ~~existing-established~~ 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 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 approach. 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. The Council has also prepared a Small Sites SPD to support the delivery of high quality housing. All development proposals for small sites must demonstrate how the SPD has been used to inform the design-led approach.

~~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 Design Guide SPD and Small Sites SPD, 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.~~

Commented [NE140]: Repetition – this is covered elsewhere in the plan

~~7.26-7.18.~~ 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 of legal agreements and/or planning contributions.

~~7.27-7.19.~~ 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

~~7.28-7.20.~~ 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 (2019/2021), ~~which shows there is an a particular local acute~~ need for family housing.

Commented [NE141]: Amended to refer to latest technical evidence

~~7.29-7.21.~~ There is a limited supply of family sized housing units in the Borough, with the 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~~ Development proposals must therefore ensure that existing family sized units are not unnecessarily lost through conversion. This policy is not considered to inhibit the achievement of the small sites housing target, as proposals will continue to be supported where adequate family sized units are retained or re-provided.

~~7.30-7.22. Whilst we are intent on retaining family sized units on residential conversions, some flexibility may be applied on planning decisions 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

Commented [NE142]: Repetition – parking standards covered elsewhere in the plan

Commented [NE143]: This policy may be subject to revisions pending outcomes of SHMA Update 2021. This is will be a focussed update to respond to new Government policy on First Homes, which the Local Plan must address.

In addition, some further work may be required on the AH contributions from small sites e.g. to aid policy implementation, further details set out on calculating the level of contributions expected.

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:
- Their contribution to the Borough's strategic affordable housing target, based on habitable rooms, subject to viability;
 - 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);
 - The preferred housing size mix for genuinely affordable housing, as set out in the Council's Housing Strategy, or other supporting evidence;
 - Availability of public subsidy; and
 - 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~~
~~a-b.~~ A minimum 50 per cent on public sector land;
~~b-c.~~ 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:

Commented [NE144]: Respond to public consultation – amended to ensure conformity with London Plan

- 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 neighbourhoods and communities

- L. In order to secure inclusive and mixed neighbourhoods and 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

[7.32-7.23.](#) 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.

[7.33-7.24.](#) 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.³⁷ 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.

[7.34-7.25.](#) 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 level³⁸ 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

³⁷ Lewisham Housing Department statistics, May 2019.

³⁸ GLA London Affordable Rent is defined locally as London Affordable Rent, minus the 1% above Consumer Price Index uplift.

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.

[7.35-7.26](#). 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.

[7.36-7.27](#). 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 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.

[7.37-7.28](#). 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.

[7.38-7.29](#). 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.

[7.39-7.30.](#) 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.

[7.40-7.31.](#) 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.

[7.41-7.32.](#) 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.

[7.42-7.33.](#) 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).

[7.43-7.34](#). 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.

[7.44-7.35](#). 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 neighbourhoods and 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

[7.45-7.36](#). 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.

[7.46-7.37](#). 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.

~~7.47-7.38.~~ 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:
 - a. There is no net loss of affordable housing, and an uplift in genuinely affordable housing is delivered wherever possible;
 - b. 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 of~~ a high quality ~~standard design~~ 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

~~7.48-7.39.~~ 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.

~~7.49-7.40.~~ 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.

~~7.50-7.41.~~ 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.

~~7.51-7.42.~~ 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.

~~7.52-7.43.~~ 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 development~~ proposals for estate renewal and regeneration must ensure that there is no net loss of affordable housing, ~~in line with other Local Plan policies~~. 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.³⁹ 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~~

³⁹ 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.

~~and functional layouts along with well integrated amenities. This includes proposals for new build housing development, changes of use, alterations and extensions.~~

- ~~B.A. 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.a. 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.a. Communal amenity space; and~~
 - ~~d.a. Children's play space, having regard to Policy CI 3 (Play and informal recreation).~~
- ~~C.A. 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;~~
 - ~~b.a. Outside amenity space; and~~
 - ~~c.a. Usability and ongoing maintenance.~~
- ~~D.A. 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.A. 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.A. 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.A. 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.a. Outlook for occupants;~~
 - ~~c.a. Microclimate management including for heating, cooling and ventilation; and~~
 - ~~d.a. Amenity including adequate privacy and protection against exposure to odour, noise, light and air pollution.~~

Explanation

~~7.53.1.1. Everyone should have access to a decent and secure home that is adaptable to one's changing needs over their lifetime. We will seek to ensure that all new housing development, irrespective of tenure, is designed to a high quality standard and meets the diverse needs of Lewisham's resident population. This includes new build housing, as well as proposals involving the alteration or extension of existing housing units, as well as conversion of other buildings into housing.~~

~~7.54.1.1. The quality and standard of housing is a key issue in Lewisham. One in four residents now live in the private rented sector, which is double that of 15 years ago. We estimate that a quarter of private rented properties are non-decent. As further evidence, between January 2015 and October 2018 the Council received over 2,000 complaints about the condition of private rented properties. We inspected all those properties and found around half of them had poor energy efficiency (rating of D or below). Whilst the proportion of social housing units meeting the Decent Homes standard increased from 41% to 94% in the ten years from 2007, the Council's own research suggests private sector housing is not achieving the same level of standards.⁴⁰~~

~~7.55.1.1. We will apply the London Plan space standards when considering housing proposals (including for internal and outside space, communal amenity space and children's play space). We will also have regard to the qualitative design aspects set out in draft London Plan Policy D4, along with other Local Plan policies. Applicants are advised to refer the London Plan for further details. Development proposals must meet and should seek to exceed the minimum standards.~~

~~7.56.1.1. Housing developments should seek to maximise the provision of genuinely affordable housing. They should also support inclusive neighbourhoods and communities by ensuring that housing of all tenure types are designed to a high quality standard and well integrated, both within the development and with neighbouring residential properties. Housing should be designed to be 'tenure blind' so that units are similar in external appearance, with entrances and access routes that promote social inclusion. Communal amenity spaces must be accessible to all residents of the development, regardless of tenure.~~

~~7.57. Dual aspect dwellings with opening windows on at least two sides have many benefits for the amenity of building occupants, including for daylight, outlook and natural ventilation. Single aspect dwellings do not offer the same benefits, particularly for natural ventilation, which is problematic in terms of climate change adaptation. Single aspect dwellings will therefore only be acceptable in exceptional circumstances, and should be avoided where they are north facing, contain three or more bedrooms, or exposed to noise and air pollution levels above which significant adverse effects on health and quality of life occur. The design of single aspect dwellings must demonstrate that all~~

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⁴⁰ Lewisham Housing Strategy 2020-2026. Lewisham Council

~~habitable rooms and the kitchen are provided with adequate passive ventilation, privacy, daylight and outlook, and that the unit's microclimate will be appropriately managed.~~

Commented [NE145]: Moved to High Quality Design section – now Policy QD8

HO 65 Accommodation for older people

- A. The housing needs of older people will be met mainly through conventional residential accommodation in the C3 Use Class that is designed in a way that allows for easy adaptation to the different needs of users over their lifetime; ~~whether through~~ This includes new build development ~~or and~~ the appropriate retrofitting of housing units. Specialist older person's accommodation and care home accommodation should supplement conventional housing to meet the ~~varying requirements~~ needs of Lewisham's older resident population.

Commented [NE146]: Included to aid policy implementation

Specialist older person's accommodation

- B. Development proposals for specialist older person's accommodation will only be supported where they ~~address an unmet local housing need and:~~
- Respond positively to the objectives in Lewisham's Housing Strategy;
 - Make provision for a mix of tenure types including affordable housing, ~~in line with reference to~~ Policy HO3 (Genuinely affordable housing);
 - Make p~~rovision of accessible housing, in line with Policy QD2 (Inclusive and safe design);~~
 - ~~e.~~ d. Are sited at well-connected locations that are ~~easily accessible to well-served by~~ public transport, and provide for good access to shops, services, leisure and community facilities and services (including health and social care) appropriate to the intended occupiers;
 - ~~d.e.~~ e. Are ~~designed to of~~ a high quality standard design with fit for purpose accommodation and facilities suited to occupiers, staff and visitors, giving consideration to:
 - The level of independence of occupiers and corresponding level of managed care provision or support;
 - ~~ii.~~ i. ~~Provision of accessible housing, in line with Policy QD2 (Inclusive and safe design);~~
 - ~~iii.~~ ii. Private, communal and public amenity space; and
 - ~~iv.~~ iii. Access, parking and servicing arrangements, including for all types of vehicles expected to access the development.

Commented [NE147]: Amended to provide more flexibility for this type of housing to be delivered.

- ~~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.~~

Commented [NE148]: Moved to B.c above

Care home accommodation

- ~~D.C.~~ C. Development proposals for care home accommodation in the C2 Use Class will only be supported where they are appropriately located and ~~designed to of~~ a high

Commented [NE149]: Respond to consultation – requirement is considered too onerous and could preclude the delivery of older persons accommodation, along with putting additional pressure on neighbouring boroughs.

~~quality standard design, having regard to the requirements of Policy HO6.B (c-d) and HO6.C. In addition, development proposals must ensure that 100 per cent of habitable rooms are wheelchair accessible.~~

Commented [NE150]: Amended to ensure conformity with the London Plan.

Loss of specialist older persons and care home accommodation

~~E-D.~~ Development proposals ~~that will result~~ing in the net loss of floorspace for specialist older person's or care home accommodation will be ~~resisted-refused~~ unless it can be demonstrated that:

- There is a long-term surplus of ~~the specific this~~ type of accommodation in Lewisham (i.e. there is no unmet local need); or
- Adequate replacement provision will be provided, ~~whether~~ on-site or elsewhere within the Borough; ~~and/or~~
- 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.

~~F-E.~~ Where the loss of specialist older person's or care home accommodation is acceptable in line with (D) above, development proposals ~~will be expected to~~must secure the re-provision of an equivalent amount of floorspace for residential use, ~~ensuring no net loss of affordable housing, and provide including new~~ affordable housing, where appropriate.

Care home accommodation

~~G.A.~~ 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.

Commented [NE151]: This criterion has been re-ordered within the policy – see C above..

~~H.~~ ~~In order to ensure inclusive and mixed neighbourhoods and communities,~~ development proposals must not result in a harmful overconcentration of care home accommodation within the locality.

Commented [NE152]: Respond to consultation - requirement is considered too onerous and could preclude the delivery of care home accommodation, along with putting additional pressure on neighbouring boroughs.

Explanation

~~7.58-7.44.~~ 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 2033⁴¹. 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.

⁴¹ Lewisham SHMA (2019)

~~7.59-7.45.~~ 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 A~~all new residential development in the C3 Use Class ~~is must therefore be~~ 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-day~~ 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.~~

~~7.60-7.46.~~ 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.~~

~~7.61.~~ ~~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.~~

~~7.62-7.47.~~ 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. ~~Applications should state the use for which planning permission is sought.~~ 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.~~

~~7.63-7.48.~~ Where a development proposal 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.

Commented [NE153]: The London Plan benchmark is set out in new paragraph 7.49 below

Commented [NE154]: Respond to consultation – requirement to demonstrate identified need for care home accommodation considered too onerous; criterion B above and supporting text deleted.

7.64. 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.

7.65. 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.

7.66-7.49. Specialist older person's accommodation and care home accommodation must be sensitively integrated into Lewisham's neighbourhoods, at well-connected and accessible locations that are well-served by public transport and within easy reach of community facilities and services. Residents, carers and visitors should benefit from easy access to and from the site as well as the surrounding area. Developments should feature accessible pathways and gradients, enabling residents to move with relative ease whether by walking or with the use of aids, such as wheelchairs or mobility scooters. Accessibility is vital to ensuring schemes the development adequately responds 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 address isolation and loneliness, which is a key public health issue.

7.67. 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.

7.68-7.50. 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, Development proposals should be designed with reference to inclusive and safe design principles, taking into account the latest industry good practice guidance. They 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 the level of managed care provision and support required by

Commented [NE155]: Respond to consultation – removed as this infers that suitability of accommodation is linked to level of financial support available to an individual

Commented [NE156]: Amended to provide more flexibility for location of care home and specialist accommodation, whilst retaining principle that development must be in a well-connected location. Parts of this supporting text incorporated into paragraph above.

~~occupants, along with the need for high quality facilities such as amenity space (private, communal and public); storage, and space for charging of mobility scooters, as well as Developments must also make adequate provision for access, and parking and servicing for the vehicles expected at the site, with drop-off points for such as taxis, mini-buses and ambulances located near the building's principal entrance.~~

~~7.69. 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.~~

Commented [NE157]: Reference to good practice guidance included in amended paragraph 7.50 above.

~~7.70-7.51. We will seek to protect against the loss of floorspace for specialist older person's accommodation and care home accommodation in order to ensure local housing needs are met. The London Plan annual benchmark figure for specialist accommodation of 100 units correlates with findings of the Lewisham SHMA (2019). The study also identifies a need of 539 additional care home units over the plan period. The Council will work positively with stakeholders to address these needs in support of the Lewisham Housing Strategy. 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.~~

~~7.71. 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 and will seek to retain existing affordable housing, consistent with other Local Plan policies.~~

Commented [NE158]: Repetition – these points included in the policy above

HO 76 Supported and specialised accommodation

A. Development proposals for supported and specialised accommodation (including residential hostels and secured accommodation) will only 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 reference to Policy HO3 (Genuinely affordable housing);
- d. ~~Contribute to Support~~ mixed and ~~balanced-inclusive~~ neighbourhoods and communities without leading to a proliferation or harmful overconcentration of this type of supported or specialised accommodation in the locality. ~~This will be assessed where the character of the area has changed or local amenity has been adversely impacted as a result of:~~

Commented [NE159]: Removed as considered too onerous – could preclude the delivery of supported and specialised accommodation (i.e. conversion of housing)

- i. Visual amenity;
 - ii. Increased noise;
 - iii. Vehicular traffic generation, along with car and cycle parking pressure;
 - iv. Inadequate provision of waste management and recycling facilities;
 - v. Additional pressure on community facilities; and
 - vi. Anti-social behaviour and public safety; and
- e. Are appropriately located in areas and designed giving consideration to that are well-connected to services and facilities that are likely to be required by the occupiers; and
- d.f. Are of a high quality design, giving consideration to the:
- i. Accessibility to public transport, services and community facilities;
 - ii. Intensity of use that is appropriate to the size of the development;
 - iii. Integration of accommodation and facilities that are suited to the specific use or site occupants and users group it is intended for;
 - iv. including Suitable arrangements for managed care or supervision, security and community safety; and
 - v. Protection of the amenity of adjoining and neighbouring uses.

Commented [NE160]: Additional criteria included for clarity and to aid policy implementation

Commented [NE161]: This is now covered in criterion A.e above.

- B. Development proposals that will resulting in the net loss of floorspace for supported or specialised accommodation will be resisted-refused unless it can be suitably demonstrated that:
- a. The specific type of accommodation is no longer required for the particular use and/or group, or other relevant groups in need of supported housing; or
 - b. Adequate replacement provision will be provided; and/or
 - 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 tosecure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

~~7.72-7.52~~ It is important that ~~people from vulnerable groups are everyone provided with~~ access to a decent and secure home accommodation, whether for temporary stays or longer-term periods. Supported and other forms of specialised accommodation offer respite and provision of care or support for individuals with distinct needs, particularly those from more vulnerable groups, whether for temporary stays or longer-term periods. ~~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. The London Plan includes a detailed list of groups for whom supported and specialised accommodation is suited.~~⁴² Supported accommodation can take a variety of forms

Commented [NE162]: Policy supporting text amended throughout to make more concise.

Commented [NE163]: Factual update and to aid policy implementation

⁴² London Plan (2021), Policy H12 Supported and specialised accommodation.

and fall into different Use Classes, depending on the nature of use and type of care or supervision required.

~~7.73-7.53. In line with the Corporate Strategy, which aims for the Borough to be a welcoming place of safety for all, and also building on Lewisham's role as a Borough of Sanctuary⁴³, the Local Plan objectives to deliver broadly supports development proposals involving the retention, refurbishment and delivery of supported and specialised accommodation. inclusive communities, we are generally encouraging of supported housing where it clearly addresses Applications should clearly set out how the development will assist in meeting an identified need for the use proposed, is well designed and sensitively integrated into the locality. It is vital that development the accommodation is appropriate to for the intended use and end users group(s) for which it is intended, so that the specific type of managed care or supervision required can be effectively delivered effectively. Applicants are encouraged to design schemes through active engagement with relevant health and social care providers or stakeholders, wherever possible through the design-led approach. In order to contribute to the achievement of secure mixed and balanced-inclusive neighbourhoods and communities, development proposals should not result in an harmful overconcentration of similar uses within an area, particularly where this would adversely impact on amenity, community safety or local character.~~

Commented [NE164]: Amended to reflect that policy supports Lewisham's role as a Sanctuary Borough.

~~7.74-7.54. Existing supported housing should be protected-retained and maintained to a decent standard where it is in a suitable condition and need exists, whether for the specific group it is currently serving or other vulnerable groups. Development proposals involving the change of use or loss of accommodation on the basis of HO6.B.a above must consider nNeed should be considered at both the local and sub-regional level, recognising that delivery of provision for certain types of uses or groups may require involve 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.~~

~~7.75. 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.~~

Commented [NE165]: Repetition – these points included in policy above

⁴³ Lewisham has been recognised as a Borough of Sanctuary by the national charity 'City of Sanctuary', and as has been awarded the title of 'Council of Sanctuary' in May 2021.

HO 87 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~~The accommodation is secured for use by students, as demonstrated by an nomination agreement with one or more specific higher education ~~institutions~~providers;
 - ~~Make provision for~~The maximum level of accommodation is secured as affordable student accommodation; in line with ~~draft the~~ London Plan ~~Policy H17 (Purpose built student accommodation)~~; and
 - ~~The development~~ De will 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~~ and public transport;
 - 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~~To contribute to mixed and ~~balanced~~inclusive neighbourhoods and 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)~~facility 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:~~ must be of a high quality design, giving particular consideration to:
- ~~A high quality living environment with a~~Adequate functional living space and layout, with good-sized bedrooms and well-integrated communal areas and facilities;
 - Inclusive and safe design, including pProvision for wheelchair accessible accommodation, spaces and facilities, ~~in line with Policy QD2 (Inclusive and safe design)~~;
 - Amenity of occupiers and neighbouring properties ~~Amenity considerations are integral to the design-led approach (including~~ consideration for outlook, daylight and sunlight, noise ~~impacts~~ and ventilation);
 - Adequate on-site cycle parking facilities;
 - ~~The a~~Accommodation that is suitable for year-round occupation; ~~and~~
 - ~~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.

Commented [NE166]: This SHMA Update study will consider local need for student accommodation, which may inform future revisions to this criterion. This is to ensure that new development does not result in a harmful overconcentration of PBSA in the Borough.

Commented [NE167]: Policy amended throughout for clarity and to aid implementation.

Commented [NE168]: Amenity now covered in C.c above

- E. ~~Development proposals involving t~~The loss of ~~existing Purpose-Built Student Accommodation~~PBSA will be ~~resisted-refused~~ unless it can be suitably demonstrated that:
- There is no ~~local~~ demand for student accommodation to serve the existing or another higher education institution ~~in the area~~; or
 - Adequate replacement accommodation ~~can will~~ be provided in an appropriate location accessible to the higher education institution it serves.
- F. Where the loss of ~~PBSA~~accommodation is acceptable in line with (E) above, development proposals ~~will be expected to~~must secure the re-provision of an equivalent amount of floorspace for residential use, including an element of affordable housing, where appropriate.

Explanation

~~7.76. 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.~~

Commented [NE169]: Repetition – the London Plan provides information on spatial distribution of PBSA in London

~~7.77-7.55. 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.

~~7.78-7.56. 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

Commented [NE170]: Repetition – these points are covered in the policy

consideration of proposals for PBSA that would result in the net loss of existing housing units.

~~7.79-7.57.~~ 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 provider.~~ They must also ~~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 The London Plan Policy H17, makes clear that~~ 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).~~

~~7.80-7.58.~~ ~~Draft The 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.

~~7.81-7.59.~~ New PBSA should be directed to well-connected and highly accessible locations, ~~including those supported that benefit from~~ by good walking and cycling routes, and within easy reach ~~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.

~~7.82-7.60.~~ New PBSA must be of a high ~~standard of quality~~ 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 ~~bedrooms/units 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.

~~7.83-7.61.~~ Whilst many students require accommodation during term time only, some residents ~~will may need use accommodation as their a~~ permanent ~~address home~~

~~throughout their studies~~ and development therefore should ~~allow make provision of units~~ 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~~ Planning conditions or legal agreements will be used to ensure that any temporary or ancillary uses do not result in a material change of use of the building.

~~7.84-7.62.~~ PBSA can benefit Lewisham's neighbourhoods and 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-inclusive~~ 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.

~~7.85-7.63.~~ 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.

~~7.86-7.64.~~ We will seek to ~~protect-againstprevent~~ 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.

Figure 7.1 Article 4 Direction on HMOs

HO ~~98~~ 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-permitted~~ 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, which includes but is not limited to the following considerations:
 - i. Location within a residential street or area;
 - ii. Size and layout, including number and size of individual rooms and bedrooms;

~~ii-iii.~~ Amenity space, such as access to a private garden;

~~b.~~ Contribute to inclusive and mixed neighbourhoods and ~~Do not~~ result in a harmful overconcentration of HMOs in the area. This will be assessed where the character of the area has changed or local amenity has been adversely impacted as a result of:

~~i.~~ Visual amenity, including impacts arising from poorly maintained properties;

~~ii.~~ Increased noise;

~~iii.~~ Vehicular traffic generation, along with car and cycle parking pressure;

~~iv.~~ Inadequate provision of waste management and recycling facilities;

~~v.~~ Additional pressure on community facilities; and

~~ii-vi.~~ Anti-social behaviour and public safety.

~~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;~~

~~b-c.~~ Are appropriately located in areas of good transport accessibility that are well-connected to local services by walking, cycling and public transport; and

~~e-d.~~ Are well-designed and provide high quality accommodation that satisfies the relevant standards for HMOs, including units that provide adequate functional living spaces and layouts 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-~~de~~) 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-refused~~ 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 housing~~ 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. ~~Development proposals for~~ 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:

Commented [NE171]: Amended for clarity and to aid effective policy implementation, taking into account recent planning appeal decisions in the borough

Commented [NE172]: Amended for clarity and to aid effective policy implementation

Commented [NE173]: Amended to appropriately reflect that HMOs are a specialist form of accommodation and do not have the same space standards as conventional housing units; however the policy retains the reference to the Council's own HMO standards

Commented [NE174]: Repetition – this point is picked up in A above.

Commented [NE175]: Policy amended throughout for clarity and to aid effective policy implementation

- a. ~~They meet~~ There is an identified local ~~need~~ market demand for the type of housing proposed and the development will not lead to a proliferation of this type of development in an area and the Borough which will compromise the delivery of conventional housing;
- b. Private ~~residential~~ units within the development are demonstrably not self-contained accommodation homes in the C3 Use Class or capable of being used as self-contained homes;
- c. There is ~~adequate well-integrated~~ provision of communal facilities and services ~~sufficient to meet~~ the requirements of the intended number of occupiers;
- d. ~~The development is~~ appropriately located and ~~designed to~~ of a high quality ~~standard~~ design, having regard to the requirements of (A) above;
- e. The development will be under single management, suitably managed and maintained over its lifetime, as evidenced by a management plan;
- f. All units are available to rent, with minimum tenancy lengths are available to occupants of no less than 3 months; and
- g. A cash-in-lieu contribution is made towards affordable housing in the C3 Use Class.

Commented [NE176]: Amended for conformity with the London Plan

Explanation

~~7.87-7.65.~~ 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.⁴⁴

~~7.88-7.66.~~ 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.

~~7.89-7.67.~~ 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.

⁴⁴ 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.

~~7.90-7.68.~~ 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 and will continue to play a role in meeting local housing needs. ~~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. However this type of provision must be carefully managed in order to ensure high quality housing that supports mixed and inclusive neighbourhoods and communities.~~

~~7.92-7.69.~~ 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~~ must ensure these standards, or any future equivalent, 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.

~~7.92-7.70.~~ 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 buildings. We will seek to protect HMOs where there is good reason to believe they could be improved to a decent standard.

~~7.93-7.71.~~ 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~~ development proposals must make appropriate re-provision of residential floorspace giving priority to HMO or other accommodation to meet priority needs in the Borough, including genuinely affordable housing.

~~7.94-7.72.~~ New HMOs should contribute positively to their local area, ities by supporting the delivery of mixed and balanced communities. ~~Development p~~ Proposals and 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 the character and amenity of immediate and neighbouring properties. Furthermore, as with other forms of higher density development, housing with shared facilities should be sustainably located in well-connected

areas with good ~~public transport accessibility levels (PTAL 3 or higher) and within easy~~ access to facilities and services.

~~7.95-7.73. The Council to help inform preparation of the Local Plan has undertaken a review of HMO accommodation in Lewisham was undertaken.⁴⁵ It 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 subsequently implemented an 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. Development pProposals for new small HMOs in these wards will be considered against Part (B) of the policy. The Council will continue to monitor and review HMOs and may in the future extend the Article 4 Direction area.~~

Commented [NE177]: Removed to make more concise – the HMO Review report is referred, and this is publicly available as part of the local plan evidence base

Large-scale purpose built shared living accommodation

Commented [NE178]: To signpost that the Council may extend the Article 4 Direction for HMOs in the future.

~~7.96-7.74. London has very recently experienced a rise in development of Llarge-scale purpose-built shared living accommodation, including co-living schemes. These products are similar in built 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 In Lewisham this threshold will be considered established on a case-by-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 nature and scale is appropriate to its location.~~

Commented [NE179]: Supporting text amended throughout to make more concise and to reflect changes to criterion D above.

~~7.97. Whilst recognising that housing with shared facilities contributes to meeting housing need in London, our the Lewisham Strategic Housing Market Assessment indicates that there is an acute need in the Borough for conventional housing, priority is to secure provision of especially 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.~~

~~7.98-7.75. Consistent with draft London Plan Policy H18, we will only support Development proposals for large-scale purpose-built shared living~~

⁴⁵ Lewisham HMO Review and Evidence Paper Update (2018).

~~accommodation will therefore only be supported where there is an identified local need-market demand for such provision, and they will not lead to a proliferation of this type of housing locally. 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 to deliver~~ conventional forms of self-contained, family housing and affordable housing units, ~~to be delivered on larger sites,~~ and to prevent against speculative development which does not adequately respond to local need. ~~Applicants will be required to submit robust evidence of market demand in the Borough for the type of provision proposed, along with evidence to demonstrate that the development will not result in a proliferation of purpose-built shared living in the Borough.~~

Commented [NE180]: Supporting text amended to make clear how development proposals must justify the appropriateness for large scale shared living

~~7.99-7.76.~~ It is imperative that large-scale shared accommodation is ~~of a high quality design and appropriately designed and well-managed, so to meet the specific housing need, in order to address the requirements and number of residents~~ it is intended for. This includes provision of high quality, ~~adequately sized and functional~~ living spaces, ~~communal indoor and outdoor amenity areas, and shared facilities, 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~~ Development 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.

Commented [NE181]: Repetition – housing design policies set out elsewhere in the plan

~~7.100-7.77.~~ ~~Where proposals are acceptable in principle, we will require that All large-scale shared living units must be available for rent with minimum tenancy lengths are available to occupants of at least 3 months, in line with the London Plan.~~ 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 ~~ensure that development is appropriately designed and managed in order to~~ prevent against future material changes of use, where development effectively reverts to ~~an~~ other forms of specialist accommodation, such as ~~a~~ large scale hostels, which ~~are is~~ not considered appropriate in the Borough, ~~or conventional housing for which the building is not originally designed and intended for.~~

Commented [NE182]: Amended for conformity with London Plan

~~7.104-7.78.~~ ~~Given their nature and scale, Development~~ proposals for large-scale purpose-built living accommodation ~~will be expected to~~ must make a cash-in-lieu contribution ~~contribute towards~~ the delivery of affordable housing in the C3 Use Class, 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.~~ In line with the London Plan, the contribution is to be equivalent to 35 per cent of the units, or 50 per cent where the development is on public

~~sector land or industrial land appropriate for residential uses, in accordance with Policy E7, to be provided at 50 per cent of the market rent. The nature of the payment, whether up-front cash-in-lieu or annual payments in perpetuity to the Council, will be established on a case-by-case basis.~~

Commented [NE183]: Amended for conformity with the London Plan

HO 409 Self-build and custom-build housing

- A. The Council will ~~keep a register of those seeking to acquire serviced plots in the Borough for their own self-build and custom-build house building. It will also seek to identify sites-plots 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 only be supported where ~~a local need for this type of provision is clearly established and~~ they:
- Make the optimal use of land ~~and support the delivery of the spatial strategy; 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);~~
 - Make provision for affordable housing in line with Policy HO-3 (Genuinely affordable housing); ~~and~~
 - Are appropriately located, ~~and of designed to~~ a high quality ~~standard design, with reference to other Local Plan policies (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. ~~Development p~~Proposals for self-build ~~or and~~ custom-build housing ~~should must~~ demonstrate how the design-led approach has ~~informed the development been used, and. They should~~ clearly identify whether there are any elements of ~~the design that may be change or become require~~ adaptation ~~owing to the unique nature of the design and construction process to secure the delivery of new housing.~~

Commented [NE184]: Amended to make clear that Council will fulfil this statutory obligation

Commented [NE185]: Removed as this requirement is considered too onerous and to provide a more positive approach for this type of housing

Commented [NE186]: Repetition – policy on the optimal use of land is covered elsewhere in the plan

Commented [NE187]: Repetition – design standards sets out elsewhere in the plan

Commented [NE188]: Amended for clarity and to aid policy implementation

Explanation

~~7.402-7.79.~~ 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.

~~7.80.~~ The Council has a ~~statutory duty~~ under the Self Build and Custom Housebuilding Act 2015 and Custom Housebuilding (Register) Regulations 2016 to ~~maintain~~ keep a register of those seeking to acquire plots for self-build and custom-build

Commented [NE189]: Factual update – reference to relevant legislation

housing ~~in the Borough~~ and ~~to~~ have regard to this register in its planning, ~~and~~ housing ~~and related~~ functions. The register forms part of the Local Plan evidence base ~~informing Local Plan preparation~~. It provides an indication of the demand for serviced plots ~~for self-build and custom-build housing~~ from individuals or groups who meet specific eligibility ~~considerations~~ criteria. 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,~~

~~7.103-7.81. Identifying suitable sites for self-build and custom-build housing in Lewisham will remain a challenge with the 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 Council's local register have expressed a preference for plots located in 'town centres', ~~These are locations~~ where the capacity of sites will need to be optimised through higher-density development, in line with the spatial strategy for the Borough, ~~and may not be best suited for more moderately scaled self-build or custom-build projects.~~ Local land values may also ~~prohibit the present~~ viability issues for those seeking to acquire plots of such development.

~~7.104. 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.~~

~~7.105-7.82. Development p~~Proposals for self-build and custom-build housing must use the design-led approach to ensure high quality development will be supported where they that responds positively to the locality, optimises the capacity of sites and supports the delivery of the spatial strategy for the Borough. Applicants should clearly identify whether any elements of the design may require adaptation or alterations. This will help the Council to work with applicants to respond to the unique challenges facing self-builders and to ensure schemes are policy compliant. ~~All proposals must be designed to a high quality standard and make P~~provision for an element of affordable housing, where appropriate will be required in line with other Local Plan policies. ~~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.~~

Commented [NE190]: Removed to make more concise – does not affect policy or its implementation

HO 4410 Gypsy and traveller accommodation

~~A. The Council will continue to 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 through a future review of the Local Plan.~~

~~B.A. There is an identified need in Lewisham up to 2031 for 6 additional permanent gypsy and traveller pitches. To meet the Borough's current identified need for gypsy and traveller accommodation, a To meet this need in full a new site is site allocation policy is included in this Local Plan.~~

~~C.B. All Development proposals for gypsy and traveller accommodation, including the development of new sites and pitches, must meet the following requirements of a high quality layout and design and make adequate provision for:~~

- ~~a. Suitable provision of Bbasic amenities including for running water, sewerage/drainage, energy and waste management;~~
- ~~b. Safe and reasonably convenient access to and from the sitemain road network;~~
- ~~c. Acceptable Access, parking and servicing arrangements for all vehicles likely to use the site, including emergency services vehicles (giving consideration to access, parking, turning and service requirements);~~
- ~~d. A site location that is well-integrated into the locality with rReasonable access to local shops, services and community facilities having particular regard toincluding education, and health services and social care; and~~
- ~~e. The provision is well integrated into the locality with a satisfactory layout and standard of Ffacilities to serve occupiers of the development, including where appropriate pitches, hardstanding, amenity blocks, open and amenity space and play areas. and~~

~~D.C. Development proposals for gypsy and traveller accommodation must not result in unacceptable pose a risk to public health and safety, and not adversely impacts on the safety and amenity of site occupants and neighbouring properties.~~

Explanation

~~7.106-7.83.~~ 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. The London Plan requires the Local Plan to include a 10-year pitch target for permanent gypsy and traveller pitches, based on a needs assessment.⁴⁶

~~7.107-7.84.~~ 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 the housing needs requirements of Lewisham's gypsy

⁴⁶ London Plan (2021) Policy H14 'Gypsy and traveller accommodation' sets out that Boroughs that have not undertaken a needs assessment since 2008 should use the targets included in Table 4.4 of the London Plan.

Commented [NE191]: Arrangements for local plan monitoring are set out in Part 4 of the plan. A gypsy and traveller assessment has been undertaken to inform this local plan, as set out in the policy and supporting text.

Commented [NE192]: Respond to consultation and to ensure conformity with the London Plan – the Local Plan must include a 10-year pitch target for this type of provision, as informed by local evidence.

Commented [NE193]: Criteria amended for clarity and to aid policy implementation – the policy principles remain.

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 up to 2031.~~ ~~This need arises~~ing from people currently living in bricks and mortar homes, teenage children and household formation. ~~To meet this need a site allocation policy is included in Part 3 of the Local Plan (Lewisham's South Area, Land at Pool Court). A Masterplan and Capacity Study (2018) demonstrates that this type of housing provision can feasibly be delivered at the site.~~

~~7.108. Having regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This 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 10th September 2018. Consultation responses have been considered 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. The Council will now proceed with making provision for a dedicated gypsy and traveller site by way of a site allocation in this Local Plan (i.e. Poole Court). The single Issue Gypsy and Traveller Site Local Plan has therefore been withdrawn from the Council's Local Development Scheme.~~

~~7.109-7.85. The Council is committed to ensuring suitable provision is made to meet identified need for gypsy and traveller accommodation. The London Plan states that a London-wide gypsy and traveller needs assessment will be undertaken in the future. The Council will monitor any changes to the London Plan to inform a future review of the Local Plan. In the interim, development proposals for new gypsy and traveller sites, pitches and/or plots will be assessed against this policy, 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.~~

Commented [NE194]: Not required for Regulation 19 plan

Commented [NE195]: Amended to reflect latest London Plan position on gypsy and traveller accommodation

8 Economy and culture

What you've told us

Concerns about:

- ~~Shops and traders getting priced out the area~~
- ~~The quality and future of our High Streets~~
- ~~Number of hot food takeaways, especially near schools~~
- ~~Lack of opportunities for young people, such as apprenticeships~~

More should be done to provide good jobs for local people by:

- ~~Supporting small businesses, including start-ups and independents~~
- ~~Making space for trades, such as mechanics and builders~~
- ~~Encouraging a wider mix of uses in town centres, not just shops~~

- Promoting the night-time economy
- Protecting our thriving markets, cultural venues and pubs
- Securing reliable, high speed broadband for businesses to thrive

What we've learned

Small local economy, formed mainly of small businesses

- Just 40 jobs for every 100 working age residents, the second lowest proportion of any London borough.
- 90% of businesses in Lewisham are small businesses

More business space needed, including affordable workspace

- Lewisham is losing industrial land at a faster rate than the rest of London
- Excellent take-up of workspace – but limited space available for businesses to expand or locate here
- Rents are similar to the London average, but rising
- About 1,000 square metres of new workspace will be needed each year to 2040, mainly for light industrial and office uses.

Creative sector growing quickly

- Creative and digital sector is outpacing growth across London
- Lewisham has some of the highest numbers of artists' workspaces in the Capital along with world renowned institutions, such as Goldsmiths College and Trinity Laban Centre.

High streets face challenges

- Online shopping continues to rise
- Some town centres are faring better than others – nearly 40% of units in Leigate are vacant, the most of all larger centres
- About 5,300 square meters of new retail floorspace will be needed by 2030.

COVID-19 has impacted businesses

- Businesses and jobs have been impacted by COVID-19. The Local Plan will help to support the recovery of Lewisham's economy.

Main issues

Making the best use of land

Space is needed for businesses to grow and prosper. But many more homes must be built. The right balance must be struck to achieve the best use of land.

Out-of-centre retail parks

The future role of out-of-centre retail parks in a growing borough needs to be considered.

Inclusive economy

Cultural and creative industries are quickly expanding, with opportunities to grow the local economy around them. Yet other sectors can provide good jobs for local people and should be supported.

Affordable workspace

With low vacancy rates in most employment areas and rents rising, affordability of workspace is an issue.

Design quality

Poor design quality has played a part in low uptake of units in some mixed-use buildings, despite demand for space.

High Streets need help

Measures are needed to respond to the challenges facing the high street and to ensure town centres remain vibrant places.

We're proposing to...

Protect and revitalise industrial areas

- Introduce stronger protections for employment sites, so they remain in business use
- Regenerate underused sites, such as Convoys Wharf and Surrey Canal Triangle
- Enable the mixed-use redevelopment of some sites for new workspace and housing – but only where there is no loss of business space
- Grow the cultural and creative industries by identifying a new Creative Enterprise Zone in north Lewisham

Secure high quality and affordable workspace

- Require that new workspace is designed and built to a high quality standard
- Seek affordable workspace in larger developments

Make town centres more vibrant places

- Identify new evening and night time economy hubs and Cultural Quarters
- Protect markets, cultural venues and pubs
- Encourage a richer mix of uses, whilst identifying 'shopping areas' in larger centres to retain traders
- Review the network of shopping parades and re-designate some as local centres
- Transform out-of-centre retail parks into areas for housing, jobs and community uses

We've also considered

- Not allowing for mixed-use development (including housing) on industrial sites.
- Specifying the mix of different types of uses allowed on the high street (such as shops)
- If contributions for affordable workspace harm the viability of the development

<Did you know?>

Lewisham has been named the Borough of Culture for 2022, which will feature an exciting programme of events. The borough also has one of London's first Creative Enterprise Zones (CEZ), reflecting the strength of its creative and cultural industries.

Commented [NE196]: Not required for Regulation 19 plan

Note: Paragraph numbers for the supporting text in Part One, Section 8 do not appear in the desktop published version of the Draft Local Plan (January 2021) due to a publishing error. They have been added below for completeness.

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 work positively with stakeholders and its delivery partners~~ to build a thriving and inclusive local economy ~~by that provides everyone with access to high quality education, training and good job opportunities, attracting and generating inward investment, including by:~~ This will be achieved by:
- Promoting and strengthening Lewisham's role in the London economy, including by supporting business sectors of local importance, such as the cultural, creative and digital industries, along with expanding the role of green industries to enable the transition to a low carbon, circular economy;
 - ~~Working with stakeholders to~~ Ensuring the timely delivery of strategic infrastructure to support business growth and development (including transport, digital and communications infrastructure) that and better enables local residents and businesses to access economic opportunities across the Borough and further afield;
 - Safeguarding industrial land 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;
 - ~~Ensuring~~ Requiring that new employment development is designed to of a high quality standard design and contributes positively to the local area;
 - ~~Retaining and s~~ Securing new lower-cost and affordable workspace, and ~~coordinating with specialist providers to ensure~~ this -it is appropriately managed; and
 - ~~Providing~~ Ensuring residents with benefit from good access to high quality jobs as well as education, skills and employment training opportunities.

Commented [NE197]: Respond to consultation – request that local plan provide greater support green industries

Cultural and creative industries

- ~~B.A. 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:~~
- ~~Protecting existing cultural venues and uses, including by having regard to policy QD7 (Amenity and agent of change);~~
 - ~~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;~~
 - ~~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.a. ~~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.a. ~~Facilitating the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital and communications infrastructure and connectivity).~~

~~C.A. 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).~~

Commented [NE198]: This has been moved and incorporated into amended policy EC18 Culture, creative industry and night-time economy

Explanation

8.1. London is a global centre of trade and commerce and the engine of the UK economy. Prior to Covid-19 London underwent a strong and sustained period of economic growth. However the same levels of growth were not experienced in Lewisham. Whilst the number of new businesses being formed in the Borough has risen over recent years much of this is due to structural changes in the nature of work with higher levels of self-employment and contract work along with expansion of the gig economy. There are just 40 jobs in Lewisham for every 100 working age residents, the second lowest proportion of any London borough. In addition, local employment is underrepresented in higher skill sectors, such as professional services. Wage levels for workers in Lewisham are lower than the regional average.⁴⁷ In short, London generates a significant amount of wealth but the benefits of its economic success are not evenly or equitably shared within it.

8.2. Covid-19 has had a pronounced short-term impact on the UK economy. The magnitude of the recession caused by the pandemic is unprecedented and the 9.8 per cent decline in 2020 of the country's Gross Domestic Product (GDP), a key measure of economic output, is the steepest since records began.⁴⁸ London has suffered severely during the pandemic and it faces a challenging economic outlook over the short-to-medium term.⁴⁹ Covid-19 has also affected the nature of business activity, for example, by accelerating trends in home-working and the use of multi-channel or online shopping. There remain uncertainties on the long-term implications of the pandemic however it is clear that targeted measures are needed to support Lewisham's economic recovery.

Commented [NE199]: Respond to consultation – to reflect on impact of Covid and Brexit and implications for Local Plan

8.1-8.3. Helping to facilitate the creation of a thriving, diverse and inclusive local economy ~~is one of our~~ that tackles inequalities is one of the Local Plan's key priorities/strategic objectives. ~~This means~~To realise this objective it will be necessary to growing, and strengthening and diversify the local economic-employment base. Lewisham has lost a significant amount of its industrial capacity over recent years.

⁴⁷ Lewisham Local Economic Assessment (2018).

⁴⁸ Coronavirus: Economic Impact (2021). Daniel Harari and Matthew Keep. Accessed from House of Commons Library.

⁴⁹ Covid-19 and London's Economy – Impacts so far and economic outlook (2021). GLA Economics.

~~and at a faster rate than the rest of London, diminishing its relatively limited supply of employment land.⁵⁰making available a wide range of job opportunities, workspaces and employment sites across the Borough. To meet the Borough's future needs for business activity and jobs it will be necessary to safeguard employment land and create new modern workspace.~~ 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 these~~ 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 area~~ to be designated ~~by the London Mayor as~~ one of London's first Creative Enterprise Zones (CEZ), ~~known as SHAPES~~ Lewisham. The Local Plan helps to embed that designation in planning policy and establishes the extent of the CEZ area. The green industries also present opportunities to respond to the climate emergency by supporting London's transition to a low carbon, circular economy.

~~8.2.8.4. Equally, we are committed to~~ ~~In order to tackling tackle~~ inequalities and the economic barriers that affect people's lives it is imperative that everyone ~~by ensuring residents have~~ has opportunities to access ~~to~~ good quality jobs opportunities along with high quality 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 and channel investment 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.~~

FIGURE 8.1: Employment Land Hierarchy

EC 2 Protecting employment sites land and delivering new workspace

- A. ~~Employment sites and floorspace~~ Land within Lewisham's employment land hierarchy, (as set out in Table 8.1 ~~below,~~) ~~will be~~ safeguarded for commercial-Class E(g) office and light industrial, and Class B2 industrial, Class B8 storage and distribution and related Sui Generis uses. ~~Proposals for new d~~ development proposals ~~should be~~ must ensure that land-uses are commensurate with the type and function of land ~~and sites~~ within this hierarchy.

⁵⁰ Lewisham Employment Land Study, 2018 and Authority Monitoring Reports.

Commented [NE200]: Repetition – design of workspace is covered elsewhere in the plan

Commented [NE201]: Amended for clarity and to aid policy implementation – specifying appropriate industrial uses, with reference to new Use Classes Order

- 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. Development proposals must contribute to meeting t~~This need will be met~~ by:
- Within Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), retaining and wherever possible delivering net gains in industrial capacity, including by intensifying the use of land ~~(ensuring no net loss of floorspace and operational yard space)~~ along with intensifying employment development, including by facilitating the co-location of employment and other compatible uses through the plan-led process;
 - Facilitating the delivery of new modern workspace through the comprehensive regeneration of Mixed-use Employment Locations (MEL);
 - Maximising opportunities ~~for to deliver~~ new and enhanced employment provision, including through appropriate mixed-use development in town and edge-of-centre locations and non-designated employment sites;
 - Outside of SIL, ~~resisting-avoiding the redevelopment of employment land and sites where proposals development that~~ consists solely or predominantly of Class B8 storage and/or warehousing uses; and
 - ~~Refusing-Ensuring~~ development ~~proposals that would does not~~ result in a net loss of viable employment land and floorspace~~industrial capacity, whether this is existing or consented but not built,~~ having regard to other Local Plan policies.

Commented [NE202]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

- C. Outside of designated employment areas the appropriateness of development proposals for new Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution and similar Sui Generis Uses will be assessed having regard to the nature and scale of the development and:
- Its contribution to the delivery of the spatial strategy for the Borough;
 - Compatibility of the proposed use(s) with the adjoining and neighbouring land uses, including consideration of impacts on local amenity;
 - Whether the employment provision is for temporary use; and
 - Compliance with other Local Plan policies.

Commented [NE203]: This policy has been moved from former EC3 Location and design of new workspace.

- D. Planning conditions will be used to protect new commercial and industrial development from changes of use.

- E. Where new business floorspace is conditioned for a specific use, changes to another commercial or industrial use appropriate for the site and employment area will only be permitted where there is no reasonable prospect of the unit(s) being retained for the conditioned use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 12-months at a reasonable rental or sale value for the local area. All such changes of use must comply with other Local Plan policies.

Commented [NE204]: Respond to consultation – Local Plan must address recent changes to planning legislation. This includes changes to Use Classes Order which extends scope of permitted development rights. These policies will help the Council to secure new workspace for specific uses.

- ~~C.A. 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.A. 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.a. Trundleys Road (Surrey Canal Road SIL)~~
- ~~c.a. Evelyn Court (Surrey Canal Road SIL)~~

Commented [NE205]: Respond to consultation – further clarification needed on approach to SIL. A new standalone policy on SIL has been created, as per new EC5, which this policy has been moved to.

Type	Ref	Location	Function
Strategic Industrial Location	SIL	Bromley Road Surrey Canal Road (including Bermondsey Dive Under new)	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	<u>Apollo Business Centre</u> Blackheath Hill Childers Street West Clyde Vale Endwell Road <u>Evelyn Court</u> Evelyn Street Lower Creekside Malham Road -(with/ 118 Stansted Road) Manor Lane Molesworth Street Perry Vale Stanton Square <u>Trundleys Road</u> Willow Way Worsley Bridge Road	Lewisham's main local concentrations of commercial and industrial uses, which perform a niche role to support the functioning of the sub-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, and enable the delivery of n New, modern workspace delivered through redevelopment is protected.

Commented [NE206]: Amended to ensure protection of industrial land – sites released from SIL to be re-designated as LSIS

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.
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Explanation

~~8.4.8.5.~~ 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 land~~ within this hierarchy is necessary to ensure a sufficient supply of land and industrial capacity to meet the Borough's current and future needs for employment. ~~This includes floorspace, yard space for operations and servicing space. 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).⁵⁴~~

Commented [NE207]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

Commented [NE208]: Not required for Regulation 19 plan

~~8.5.8.6.~~ Designated employment locations include ~~regionally Strategic Industrial Locations (SILs)~~, as set by the London Plan, and several types of locally strategic sites, ~~which are local sites include Locally Significant Industrial Sites (LSIS), formerly referred to as Local Employment Land, and Mixed-use Employment Locations (MELs).~~ 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. ~~Development proposals should maximise opportunities to intensify and make a more efficient use of land, whilst ensuring with the type and nature of uses being is commensurate with the site's place in the employment land and town centre hierarchies, where relevant. Further detailed policies for the different types of employment land are set out later in this section.~~

~~8.6.8.7.~~ Lewisham has a small amount of employment land when compared to other London ~~b~~Boroughs, ~~including in the sub-regional context. Notably, the Council's Authority Monitoring Reports indicate This limited supply has been diminished through significant and incremental losses of employment land and floorspace in industrial capacity over recent years.⁵² Some of this loss can be attributed to plan-led consolidation and release of land to support strategic regeneration objectives, particularly through mixed-use redevelopment of MELs 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 changes to planning legislation, for example, new Ppermitted Ddevelopment rights enabling the conversion of offices and warehouses to residential uses through the Prior Approval process.~~

⁵⁴ Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020). This shows the proposed changes to the employment land designations.

⁵² Lewisham Employment Land Study, 2019 and Authority Monitoring Reports.

~~8.7.8.8. In the light of these cumulative losses of employment land and floorspace, the draft London Plan provides that directs the Council Local Plan must seek to retain Lewisham's existing industrial capacity. In order to meet the Borough's future employment needs it will be necessary to not only safeguard designated and non-designated employment sites but to intensify uses on them. The Local Plan therefore seeks to facilitate a restructuring of the employment land stock, with policy interventions aimed at to increasing employment densities, and realising an uplift in employment floorspace create additional industrial capacity and diversify uses within employment areas. and This will also help to create more local jobs and training opportunities across the Borough.~~

~~8.8.8.9. The draft London Plan provides in-principle support for the co-location of employment and other compatible uses on sites that are released from SIL and within LSIS, but only 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). Further requirements are set out in Local Plan policies EC5 (Strategic Industrial Locations) and EC6 (Locally Significant Industrial Sites) along with corresponding site allocation policies. To secure the long term viability of employment floorspace and to help facilitate the renewal of SIL and LSIS, we will support proposals for the co-location of employment and other compatible uses on selected sites at the Surroy Canal Road SIL, as identified in Policy EC2.C above and within LSIS, as set out in Policy EC5 (Locally Significant Industrial Sites). The co-location of SIL land will be enabled through replacement provision made at the Dormondcoy Drive Under site, which will be newly designated SIL. Site allocation policies have been prepared for these sites to ensure that co-location is coordinated and appropriately managed through the plan led and site masterplan process.~~

~~8.9.8.10. Our expectation is that there will be no net loss of industrial capacity in the Borough, and that net gains are delivered wherever possible. Where the site is vacant or cleared, the baseline figure should be established using the last active authorised use (excluding meanwhile uses). Industrial capacity is defined in Lewisham as existing commercial/industrial floorspace capacity on a site or the benchmark potential commercial/industrial floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is greater). Where a proposed development site is vacant or cleared, the existing capacity should be established on the basis of the last active authorised use (excluding meanwhile uses). The existing capacity figure should also take into account any unimplemented authorised changes of use permitted through the Prior Approval process (which would effectively be discounted from the existing capacity). 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.~~

Commented [NE209]: Moved to new standalone policy on SIL – see EC5

Commented [NE210]: This is retained in the paragraph - see below.

Commented [NE211]: Included for clarity and to aid implementation of the policy.

8.10.8.11. There may be limited circumstances where a plot ratio below the benchmark 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 65 per cent plot ratio benchmark 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 approach.

8.11.8.12. 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 E(g)(i) and E(g)(ii).⁵³ 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-E(g)~~ uses, including ~~B1e~~ E(g)(iii) light industrial uses, to ensure that the Local Plan does not unnecessarily constrain employment development. Development proposals for Class B2 industrial and B8 storage or distribution uses should be located within SIL and elsewhere where specified by the Local Plan. Delivery of employment floorspace/industrial capacity will be closely monitored over the plan period to ensure our policy objectives are being realised.

8.13. Recent changes to planning legislation have extended the scope of Permitted Development rights.⁵⁴ This means that some commercial and industrial uses, including those in Class E business and Class B8 storage and distribution, can be changed to Class C3 housing without the need for planning permission, subject to a Prior Approval process. Likewise, there is greater flexibility for changes between Class E business uses, for example from office and light industrial to retail, food and beverage, and professional services. Whilst recognising the flexibility and benefits offered by the new Class E in some parts of the borough, particularly

⁵³ Following the publication of the Lewisham Employment Land Study (ELS) 2019, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 have come into force. These effectively bring Use Classes B1(a), B1(b) and B1(c) into a new Use Class E (Commercial, Business and Service). The former Class B1 uses are now Class E(g)(i), E(g)(ii) and E(g)(iii) respectively. Where the ELS refers Class B1 Uses, the Local Plan reflects the corresponding Class E categories for consistency with planning legislation.

⁵⁴ This includes changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015.

town centres, it is vital to plan positively for the Borough's needs for industrial capacity. The Council will therefore use planning conditions, attached to new planning permissions, to remove any applicable Permitted Development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that new commercial and industrial development is secured for this specific use and to protect the economic function of SIL, LSIS, MEL and other employment sites. The Council will also monitor development activity and consider the need to introduce Article 4 Directions to help protect the economic function and amenity of employment areas.⁵⁵

Commented [NE212]: Respond to consultation – Local Plan must address changes to planning legislation. This supporting text aligns with the amended policy above.

EC 3 ~~Location and design of new~~ High quality employment areas and 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.~~

Commented [NE213]: Repetition – location requirements set out in spatial strategy along with Policy EC2

~~B. Outside of designated employment areas and town centres, the appropriateness of a proposal for new employment development will be assessed having regard to:~~

- ~~a. Its contribution to the delivery of the spatial strategy for the Borough;~~
- ~~b. Good levels of 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 provision is for temporary use.~~

Commented [NE214]: This policy has been moved to EC2 Protecting employment land and delivering new workspace

~~C.A. All new employment development proposals for Class E business, B2 industrial and B8 storage or distribution uses and related Sui Generis uses must provide be of a high quality design, with well-integrated and purpose built floorspace designed for commercial and/or industrial uses/business space. Proposals will be expected to They must make a demonstrable demonstrate how the design-led approach has been used to improvement in the site's suitability for accommodating employment-generating uses/business activity with particular consideration given having regard to the type and use of space. Development proposals must:~~

Commented [NE215]: Amended to reflect appropriate uses in light of recent changes to the Use Classes Order

- ~~a. Optimise the use of land and maximise opportunities to Type of floorspace provided and the expected increase job densities arising from this typology;~~
- ~~b. Make pProvision of for an appropriate full level of internal fit out beyond shell and core, including:~~
 - ~~i. Connection-ready high speed broadband;~~
 - ~~ii. Installation of mechanical and electrical services;~~
 - ~~iii. Toilets and kitchenette;~~
 - ~~iv. Internal surface finishing and blinds;~~

⁵⁵ This is a direction under article 4 of the General Permitted Development Order which enables the Secretary of State or the local planning authority to withdraw specified permitted development rights across a defined area.

- v. ~~Basic fire and carbon monoxide detection;~~
- i-vi. ~~Shopfronts and glazing, where appropriate.~~
- b-c. ~~Make provision for flexible workspace that can be adapted to the needs of different end employment users, including for micro, small and medium sized businesses, particularly where there is not a specified end user;~~
- e-d. ~~Ensure the Site layout and design of development, with appropriate access and provides adequate operational space for the operational and including for site access and servicing requirements of businesses;~~
- d-e. ~~Environmental improvements, the attractiveness and environmental quality of the site and employment area, including high quality public realm, where appropriate; and~~
- e-f. ~~The development's~~ ~~Ensure a coherent and positive relationship and compatibility with adjoining and neighbouring land uses, and protection of local amenity, with reference to other Local Plan policies.~~

Commented [NE216]: To make clear the minimum requirements for workspace fit out

B. ~~Development proposals for new Class E(g), B2, B8 and similar Sui Generis uses over 2,500 square metres (gross external area) must include a reasonable proportion of flexible workspace or smaller units suitable for micro, small and medium sized enterprises.~~

Commented [NE217]: Policy amended throughout for clarity and to aid policy implementation – policy principles retained

D-C. ~~Outside of/Within~~ the Forest Hill Cultural Quarter ~~and Endwell Road LSIS,~~ development proposals for ~~new~~ self-contained live-work units will ~~only~~ be ~~refused~~ ~~permitted where it is demonstrated that they will not adversely impact on the character, function and effectiveness of the Cultural Quarter and LSIS to accommodate commercial and industrial uses, and will not result in a net loss of industrial capacity.~~ Development proposals for new live-work units outside of these locations will be refused.

Commented [NE218]: Included to help give effect to London Plan policy on provision for flexible workspace from larger commercial developments

Commented [NE219]: Respond to consultation – recognition that there are authorised live-work units at Endwell Road LSIS (Dragonfly Place, Brockley), and the site is therefore suitable for such uses.

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 within the 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.~~

Commented [NE220]: Policy supporting text amended throughout to make more concise, and reflect changes in above policies

~~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. Flexibility may be afforded to temporary or meanwhile uses, or proposals for the replacement and/or refurbishment of existing employment provision, 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. The redevelopment of industrial land and other employment sites is necessary to meet local needs for modern business space as well as to support site renewal and regeneration. Most of Lewisham's employment areas are located within or in close proximity to residential areas. New commercial development that is well-designed can not only improve the quality and viability of employment areas and premises but also the liveability of neighbourhoods. Commercial development proposals must therefore respond positively to the wider neighbourhood context by addressing matters such as local character, amenity, public realm and green infrastructure.

~~8.14.8.15.~~ 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 approach ~~applicants should consider how to~~ has been used to optimise and make more efficient use of land and commercial floorspace. This may include consideration of layout options to provide higher plot ratios and building solutions designs to enable integration of smaller business units, co-working and incubator space, vertical stacking / multi-storey development, mezzanines and basement levels.

~~8.15.8.16.~~ All employment development should consist of well-designed, high quality and purpose built accommodation that responds positively to the local context. Flexibly specified buildings and workspaces should be provided wherever possible, particularly where there is not a specified end user for the development. These are ~~considered~~ essential to ensuring the long-term 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,~~ a wide range of end users 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.

~~8.16.8.17.~~ ~~New development proposals will also be expected to~~ must 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~~ New development must also 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.

~~8.17-8.18.~~ 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 helping to prevent against long-term vacancies. It is also vital to supporting micro, 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 on a site-by-site basis.

~~8.18-8.19.~~ 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. Development pProposals must therefore include consideration of address matters such as vehicle access for loading and delivery, yard space, external storage, parking, site servicing and customer interface. A well-~~conceived~~ designed 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 positively to the neighbourhoods in which they are located, 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.

8.20. Large scale commercial development proposals must incorporate a range of business unit sizes. The 2,500 square metre (gross external area) benchmark is established by the London Plan and given effect through this policy.⁵⁶ Lewisham's employment areas have very low vacancy rates which can make it difficult for businesses to find space to start up and grow. Provision for smaller units will help small business development particularly for Lewisham's creative, cultural and digital industries. What constitutes a reasonable proportion of flexible workspace or small units will be considered on a case by case basis.

~~8.19-8.21.~~ Development pProposals for new live-work units (i.e. residential and employment uses in the same self-contained unit for semi-permanent or permanent occupation) will be refused, unless they are located within the Forest Hill Cultural Quarter or Endwell Road LSIS. 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/industrial capacity. Exceptions will be made for live-work development in the Forest Hill Cultural Quarter and Endwell Road LSIS, recognising that such provision has been successfully integrated into the area and contributes to its

Commented [NE221]: Additional supporting text included to support new policy criterion B on securing flexible workspace

⁵⁶ London Plan (2021) policy E2 (Providing suitable business space).

distinctiveness. 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~~ Low-cost 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 (meanwhile use):
 - 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.
- E. 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.
- F. 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

~~8.20-8.22.~~ 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.

Commented [NE222]: This policy may be subject to further review and updating to align with the Council's emerging Affordable Workspace Strategy. Some additional work may also be required on contributions to affordable workspace e.g. to aid policy implementation, further details set out on calculating the level of contributions expected. Approaches will need to be considered in the Local Plan viability assessment.

~~8.21-8.23.~~ 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.

~~8.22-8.24.~~ 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 of 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.

~~8.23-8.25.~~ 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 Strategic Industrial Locations

A. Development proposals within SIL will be supported where the uses fall within the industrial-type activities specified by the London Plan.

B. Development proposals on sites within or adjacent to Strategic Industrial Locations SILs must not adversely impact on the functional integrity or effectiveness of the SIL or prejudice the continued operation of to accommodate commercial and industrial uses on the site or within the employment area or their ability to function on a 24-hour basis.

Commented [NE223]: Respond to public consultation – Local Plan must set out further details on the approach to managing SIL, particularly to ensure conformity with London Plan. A new standalone policy on SIL is included.

C. Development proposals within SIL should protect and seek to make provision for business activities and uses that support the function of London's Central Activities Zone (CAZ).

Commented [NE224]: Respond to consultation – the Local Plan must make clearer how it will support the function of London's CAZ, in line with the London Plan

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. The reconfiguration of the Surrey Canal Road SIL is facilitated through the Local Plan. Land at the Bermondsey Dive-Under is designated SIL to provide substitute industrial capacity for the release of SIL at Apollo Business Centre, Trundleys Road and Evelyn Court. These sites released from SIL are re-designated as LSIS where the co-location of employment and other compatible uses will be supported in line with Policy EC6 (Locally Significant Industrial Sites) and relevant site allocation policies.

Commented [NE225]: Respond to consultation – further details on how reconfiguration of SIL will be delivered, An additional site allocation for the Bermondsey Dive Under site will be included in Part 3 of the plan, which will safeguard it for uses appropriate for SIL.

Further detailed requirements are set out in the corresponding site allocation policies for the following sites:

- Apollo Business Centre (Surrey Canal Road SIL)
- Trundleys Road (Surrey Canal Road SIL)
- Evelyn Court (Surrey Canal Road SIL)

Explanation

Commented [NE226]: Policy supporting text included to justify approaches in new SIL policy above.

8.26. Lewisham contains two designated SILs at Surrey Canal Road and Bromley Road. The London Plan requires boroughs to proactively manage and sustain SILs as the region's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. This policy ensures that Lewisham's SILs are safeguarded and their economic function is enhanced and not compromised by new development.

8.27. Lewisham's SILs make up a significant proportion of the Borough's industrial capacity and are key areas for business activity and local jobs. They are also well-positioned to play a more integral role in supporting the London CAZ⁵⁷ which is a driver of the regional economy. Both SILs benefit from their proximity to central London and the wider south-east of England, including good transport connections. In addition, Lewisham features growth sectors which complement the CAZ, such as the cultural, creative and digital industries. Development proposals should protect and seek to make provision for activities and uses that support the CAZ. This includes industrial capacity for logistics and last mile distribution, 'just-in-time servicing' and other related functions as SIL are the most appropriate locations in the borough for these types of activities.

8.28. The New Cross Area Framework and Lewisham Employment Land Study (2019) identify opportunities to consolidate and intensify employment uses at Surrey Canal Road. To secure the long-term viability of industrial land within this area the

⁵⁷ Lewisham Local Economic Assessment, 2018.

reconfiguration of SIL is facilitated through the plan-led process. of employment floorspace and to help facilitate the renewal of SIL and LSIS, 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). The co-location of New SIL land will be enabled through replacement provision made is designated at the Bermondsey Dive-Under site, which will be newly designated SIL which provides substitute capacity for SIL released at Apollo Business Centre, Trundleys Road and Evelyn Court. The South Bermondsey Dive-Under masterplan (2019) demonstrates that industrial development can feasibly be delivered there. Those sites released from SIL are re-designated as LSIS in order to ensure they continue to function principally as employment locations. Their redevelopment will provide a positive transition in character and use from the surrounding residential areas to the commercial and industrial core of the SIL. Further details are set out in Policy EC6 (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 plan-led and site masterplan process.

EC 56 Locally Significant Industrial Sites (LSIS) – formerly LEL

A. Locally Significant Industrial Sites LSIS will be protected for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and a range of Class B Uses (B1, B2 and B8) along with appropriate Sui Generis uses, with priority being given to Class B4 office and light industrial 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.

Commented [NE227]: Amended to reflect appropriate uses in light of new Use Classes Order

B. Development proposals within or adjacent to LSIS must not adversely impact on the function or effectiveness of the LSIS to accommodate commercial and industrial uses.

Commented [NE228]: Included to make clear the need to protect the function of LSIS

B-C. Within LSIS, development proposals for self-storage and larger format storage and warehousing facilities will only be supported/permited in exceptional circumstances where:

- a. There is a demonstrable local need and market demand for this/the type of use proposed;
- b. The use cannot be reasonably located in a Strategic Industrial Location SIL as evidenced by a detailed site selection exercise; and
- c. The development will include provision of an element of floorspace reasonable proportion of flexible workspace or units for micro, small or medium-sized businesses.

Commented [NE229]: Policy amended throughout for clarity and to aid implementation – policy principles retained

C-D. 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. Development Proposals for involving the co-location of uses should must not compromise the functional integrity of the LSIS as an employment location in line with (B) above.

Further development requirements are set out in site allocation policies for the following sites:

- a. Apollo Business Centre
- ~~a-b.~~ Blackheath Hill
- ~~b-c.~~ Childers Street North
- d. Clyde Vale
- ~~e-e.~~ Evelyn Court
- ~~d-f.~~ Lower Creekside
- ~~e-g.~~ Manor Lane (Part)
- ~~f-h.~~ Perry Vale
- ~~g-i.~~ Stanton Square
- j. Trundleys Road
- ~~h-k.~~ Willow Way
- ~~i-l.~~ Worsley Bridge Road

~~D-E.~~ ~~Development p~~Proposals for the co-location of uses on LSIS sites listed in (~~CD~~) 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 approach;
- b. Will not compromise the functional integrity of the LSIS or preclude the delivery of the spatial strategy for the ~~B~~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-F.~~ For LSIS listed in (~~BD~~) above, where an approved site-wide masterplan is not in place, ~~development~~ proposals for non-employment uses will be assessed against the criteria in (~~FG~~) and (~~GH~~) below, which also apply to all proposals for all other LSIS locations (i.e. not listed in (~~BD~~) above).

~~F-G.~~ Within LSIS ~~development~~ proposals for ~~non-employment~~ uses (i.e. those outside of the ~~B Use Class~~ which are not Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution and similar Sui Generis uses) 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 or strategic infrastructure necessary to support the delivery of the spatial strategy, with reference to (H) below;
- c. ~~Are necessary to~~Will 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;

Commented [NE230]: Land released from will be re-designated LSIS in order to protect industrial capacity and the employment generating function of these sites – 3 sites therefore included as additions to LSIS. This is consistent with the relevant site allocation policies set out in the Regulation 18 document, where employment-led mixed-use redevelopment is supported in principle.

Commented [NE231]: Amended to reflect appropriate uses in light of new Use Classes Order

- 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 or wider surrounds; and
- f. Will not compromise the delivery of strategic requirements for employment floorspace industrial capacity, having regard to the proposal's individual and cumulative impact.

~~E.H.~~ Within LSIS, development proposals for strategic infrastructure will only be acceptable where it is demonstrated that:

- a. The infrastructure is necessary to support the delivery of the spatial strategy for the Borough, taking into account the Council's Infrastructure Delivery Plan;
- 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

~~8.24.8.29.~~ 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 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 by the Local Plan 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, Class E(g) office and light industrial with priority given to Class B4 light industrial uses, as discussed below.

Commented [NE232]: Not required for Regulation 19 plan

~~8.25.8.30.~~ In order to make the best optimal use of land there will need to be a managed process of employment site industrial land intensification. The Lewisham Employment Land Study (2019) provides that the Borough's future requirements are primarily for Class B4 office and light industrial uses. We will therefore seek to resist development proposals in LSIS that are solely or predominantly for self-storage or larger format warehousing and storage facilities (normally included in the B8 Use Class). Their 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 which is vital to the long-term viability of London's CAZ. They also provide valuable space for smaller

businesses and ~~businesses those~~ requiring additional off-site provision. ~~We will therefore consider~~ Development proposals ~~where applicants can~~ must clearly 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 and market research investigating availability of sites both within and in proximity to Lewisham, including its neighbouring Boroughs and ~~in these in~~ the London southeast sub-region. All development proposals for large format storage and warehousing ~~should~~ must deliver ~~an element~~ a reasonable proportion of flexible workspace or units to meet needs of micro, small and medium sized business, the amount of which will be considered on a case-by-case basis.

~~8.26-8.31.~~ To secure the long-term viability of employment floorspace ~~LSIS~~ and to help facilitate their renewal ~~of LSIS land, we will~~ the Local Plan provides in-principle support ~~proposals~~ for the co-location of employment and other complementary uses on selected sites, as identified in Policy EC5. ~~B-D~~ 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. Where the site is vacant or cleared, the baseline figure should be established using the last active authorised use (excluding meanwhile uses). In Lewisham, industrial capacity for LSIS is defined as existing commercial floorspace on site or the benchmark 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 approach, 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).~~

~~8.27-8.32.~~ Where the co-location of uses on LSIS identified in Policy EC5. ~~C-D~~ is proposed, development ~~proposals~~ should be designed to ensure there is no net loss of industrial capacity with reference to Policy EC2 (Protecting employment land and delivering new workspace), 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 approach, 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 ~~demonstrating~~ demonstrate that a wider public benefit ~~would~~ will 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

Commented [NE233]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc. The information on calculating industrial capacity has been moved to Policy EC2 and paragraphs 8.10 and 8.11, so this covers all employment areas not just LSIS.

element, in line with the ~~draft~~ London Plan policy ~~H5-H4~~ (Delivering affordable housing).

~~8-28-8.33~~. In the interim period where a site-wide masterplan has not been approved or agreed by the Council, development proposals for non-employment uses within LSIS will be ~~resisted-refused~~ unless they meet the criteria of Policy EC5. ~~(F-H)-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.

~~8-29-8.34~~. Whilst LSIS is protected for ~~Class B and appropriate Sui Generis Uses office and industrial uses~~ it is recognised that other employment generating 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~~ The acceptability of development proposals for such ~~non-employment uses on their individual merits, having regard to site circumstances will be considered on a site-by-site basis~~. 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.

~~8-30-8.35~~. 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 which are not office and light industrial~~. 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 main town centre~~ use within the LSIS where there may be similar accessible provision or available sites nearby.

EC ~~67~~ Mixed-use Employment Locations (MEL)

- A. The comprehensive redevelopment of ~~Mixed-use Employment Locations-MELs~~ will be supported in order to facilitate their renewal and regeneration and to secure provision of new modern workspace, with priority given to Class E(g) office and light industrial uses. All development proposals within MELs must be delivered in accordance with relevant site allocation policies and a site-wide masterplan. Development proposals ~~will be expected to~~ must 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 d~~Development proposals will be expected to ~~must protect and enhance the employment generating not adversely impact on the function or effectiveness of MELs land to accommodate business uses~~. Development proposals ~~will be required to~~ must maximise the amount of Class ~~B1 employment floorspace~~ E(g) office and light industrial uses through site redevelopment, along with providing a demonstrable and significant uplift in the number and quality of jobs. ~~Development p~~Proposals ~~will be expected to~~ must make provision for new modern workspace and associated

Commented [NE234]: Amended to reflect appropriate uses in light of new Use Classes Order

Commented [NE235]: Amended to reflect appropriate uses in light of new Use Classes Order

operational land (including yard and servicing 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:
- 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
 - Ensure there is no net loss of existing industrial capacity.

Explanation

~~8.31-8.36. Mixed-use Employment Locations~~ MELs were first designated in Lewisham's Core Strategy (2011). These locations consisted largely of older, poorer quality and redundant industrial land, buildings and uses that ~~were~~ are often incompatible with their neighbouring residential areas. To help facilitate regeneration in the north of the Borough, ~~the Council made~~ provision is made for the plan-led consolidation and redevelopment of MELs land. ~~The key aim was to~~ This will assist in tackling deprivation and inequality by improving the quality of the urban environment, delivering new housing, jobs and training opportunities, and securing investment in strategic transport and community infrastructure such as public open space and community facilities along with new and improved transport infrastructure. ~~To support mixed and inclusive communities, and to safeguard industrial capacity, the local plan policies required new development on MELs to deliver 20 per cent of new built floorspace as employment floorspace.~~

Commented [NE236]: Not required for Regulation 19 plan

~~8.32-8.37. Since the Core Strategy came into effect a~~ number of MELs have come forward for redevelopment in recent years (with building 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, consistent with the London Plan objectives for Lewisham's Opportunity Areas.

Commented [NE237]: Not required for Regulation 19 plan

~~8.33-8.38.~~ The Lewisham Employment Land Study (2019) provides that MELs locations should continue to be protected for employment generating uses. Therefore, they have been safeguarded in line with Policy EC2 (Protecting employment sites land 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 inclusive, well-connected, mixed-healthy and liveable neighbourhoods in the Deptford and New Cross areas.

~~8.34-8.39. 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~~ must provide evidence of efforts made to maximise provision of industrial capacity within the MEL. This should include evidence of the site layout and design options explored through the design-led approach, along with consideration given to a different workspace typologies (e.g. light industrial, co-working, incubator or accelerator space), and nature of employment uses.

Commented [NE238]: Repetition – this is reflected in the policy

~~8.35-8.40.~~ 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 authorised 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.

~~8.36. 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 viably maintained over the long term.~~

Commented [NE239]: Repetition – workspace design in covered elsewhere in the plan

~~8.37-8.41.~~ The comprehensive mixed-use redevelopment of some MEL sites has now been realised, for example, at Plough Way⁵⁸ (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 f~~Future proposals for redevelopment of any part of an MEL

⁵⁸ Lewisham Core Strategy (2011). Site Allocation 5 made provision for the comprehensive redevelopment of the MEL at Plough Way.

site, including changes of use, ~~which would~~must not result in a net loss of the ~~employment floorspace and~~ industrial capacity originally consented through the masterplan process. Where redevelopment or a change of use is acceptable in principle, development proposals should seek opportunities to provide net gains in workspace and jobs.

EC ~~7~~8 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. Development proposals should protect and not result in the net loss of viable industrial capacity on these sites.
- B. To ensure the continued viability of non-designated employment sites, development proposals for employment-led, mixed-used development will be supported where ~~a site is~~they are located within a ~~highly accessible location~~well-connected area with high Public Transport Access Levels, or the site forms part of a cluster of commercial, industrial and/or other employment generating uses, and the development:
- Maximises the amount of industrial capacity ~~provided, including employment floorspace~~;
 - Provides demonstrable improvements in the site's suitability for continued employment use, having particular regard to Policy EC3-~~C~~ (Location and design of new High quality employment areas and workspace);
 - 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;
 - Ensures appropriate protection of amenity both for the users of the development and neighbouring properties, with reference to the Agent of Change principle; and
 - Secures the provision of affordable housing for any residential element introduced, including through building conversions, in line with Policy HO3 (Genuinely affordable housing).
- C. On all other non-designated employment sites (i.e. those which fall outside the location requirements in (B) above) development ~~proposals should~~must not result in the net 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:
- Feasible alternative commercial, industrial and/or employment generating uses;
 - 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;
 - Site constraints including layout, access and compatibility with neighbouring uses;
 - Long-term vacancy; and
 - Evidence of recent and continuous marketing, covering a minimum period of 24 months and at an appropriate rental or sale value.

Commented [NE240]: Amended for clarity and to aid policy implementation

- D. On sites where the introduction of a residential element is acceptable in line with (C) above, ~~development~~ proposals ~~will be required to secure the~~must make provision ~~of~~ for affordable housing, in line with Policy HO3 (Genuinely affordable housing).
- E. ~~Where d~~Development proposals involvinge the net loss of industrial capacity must make 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

~~8.38-8.42.~~ There are a number of smaller employment 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 The Lewisham Employment Land Study (2019) and Council's Authority Monitoring Reports indicate that these~~ non-designated employment sites are under increasing pressure from higher value land uses, such as housing. There is a risk that the employment ~~functional integrity~~ of these sites will be compromised or lost without an appropriate level of protection. ~~We~~ The Local Plan will therefore seek s 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~~land is not unnecessarily protected when there is no reasonable prospect of it remaining in employment use.

~~8.39-8.43.~~ To help maintain the viability of non-designated employment sites, ~~we will the~~ Local Plan provides support ~~proposals~~ for employment-led, mixed-used redevelopment where a site ~~within a highly accessible location is located within a well-connected area~~ 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. A benchmark distance of 800 metres (roughly 10-~~minutes~~ walking distance) between uses will be applied as a guideline. All applications for such enabling development must be accompanied by an assessment that demonstrates the mixed-use scheme is necessary for reasons of financial 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 ~~A~~assessment must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.

Commented [NE241]: Repetition – requirements for affordable housing set out in Part 2 section on housing

~~8.40-8.44.~~ ~~In considering proposals, we will seek that~~Development proposals must provide 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 distinguishing between operational land and floorspace and~~ yard space in the planning statement⁵⁹, 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 industrial capacity~~ is diminished.

~~8.41-8.45.~~ Where enabling mixed-use development is proposed, it is important that uses do not impact on the ~~employment functional integrity~~ of the site or inhibit its ability to continue supporting commercial uses, in line with the Agent of Change principle. Furthermore, development ~~will be expected to~~ must 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~~ High quality employment areas and workspace).

~~8.42-8.46.~~ 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.~~

~~8.43-8.47.~~ Where ~~development~~ proposals involve the ~~net~~ loss of ~~employment floorspace industrial capacity~~ a financial contribution towards training or other employment related initiatives will be ~~sought~~ required, in line with Policies EC9~~10~~ (Workplace training and job opportunities) and DM2 (Infrastructure funding and planning obligations).

Commented [NE242]: Repetition – workspace design covered elsewhere in plan

Commented [NE243]: Respond to consultation and for conformity with London Plan – plan should refer to industrial capacity not floorspace, yard space, etc.

EC ~~89~~ Railway arches

- A. Development proposals involving railway arches will only be supported where:
- ~~The principal use is for an appropriate commercial, or industrial, community or cultural 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 through-by walking and cycling 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 and edge-of-centre locations; and
 - Existing lower-cost or affordable workspace is retained or re-provided, in line with Policy EC4 (~~Providing suitable business space~~ Low-cost and affordable workspace).

Commented [NE244]: Amended to broaden scope of appropriate uses to include community and cultural uses

⁵⁹ This is necessary for monitoring purposes.

- B. Proposals involving the comprehensive redevelopment of sites that include, or are adjacent to, railway arches ~~will be expected to~~ must address the use of the arches through the design-led approach, and where relevant the masterplan process.
- C. Network Rail and Transport for London should be consulted on development and design options to ensure that development will not adversely impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure.

Explanation

8-44-8.48. 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.

8-45-8.49. All development proposals should help to improve the quality of the 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 walking and cycle 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, even if the arches are not included within the development site boundary. This will help to ensure land and space is put to its optimal use and supports delivery of the spatial strategy. Applicants will be expected to consult Network Rail and Transport for London on development and design options in order to ensure there is no adverse impact on the public highway and rail network, or preclude the delivery of planned transport infrastructure, including the Bakerloo line extension.

EC 910 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

~~8-46-8.50.~~ 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.

~~8-47-8.51.~~ 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.

~~8-48-8.52.~~ 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.

~~8-49-8.53.~~ 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.

~~8-50-8.54.~~ 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.

EC 101 Town centres at the heart of our communities

- A. Town centres are ~~and should remain~~ at the heart of Lewisham's ~~neighbourhoods and~~ communities ~~and as~~ focal points for retail, commercial, cultural, leisure, ~~community~~ and civic activities. Town centres will be managed positively in order to ensure they are ~~inclusive, diverse,~~ attractive and vibrant places that are ~~made more~~ resilient and adaptable to future challenges ~~and opportunities, particularly including~~ those

Commented [NE245]: Respond to consultation – request that community uses be identified as appropriate main town centre uses

presented by new technology and changes in consumer behaviour such as multi-channel shopping.

- B. Development proposals should support and help to secure tThe long-term vitality and viability of Lewisham's town centres ~~will be secured~~ by:
- a. ~~Focussing future growth and investment~~ Optimising the use of land within and around them, ~~particularly to optimise the use of land and to strengthen connections to surrounding neighbourhoods;~~
 - b. Maintaining and enhancing their distinctive features and characteristics where these make a positive contribution to the ~~locality~~ neighbourhood, including their built form, environmental, historic and cultural character;
 - c. Ensuring they are inclusive, safe and healthy places ~~that are~~ by creating environments that are barrier-free and accessible to all, with high quality buildings, spaces and public realm that are designed to:
 - i. Reduce vehicular dominance and promote and enable movement by walking, cycling and the use of public transport, ~~having regard to Policy TR3 (Healthy streets as part of healthy neighbourhoods);~~
 - ii. Encourage street level activity along with opportunities for social interaction and relaxation, including through provision of publicly accessible open space; and
 - iii. Maximise opportunities to deliver new or enhanced green infrastructure, including by urban greening and river restoration;
 - d. Delivering an appropriate mix and balance of residential and main town centre uses in order to attract visitors and ensure people have good access to a competitive range of services and facilities, as well as to support businesses and grow the local economy through provision of a wide range of workspaces and premises; and
 - e. ~~Promoting~~ Ensuring town centres function as vibrant places of daytime, evening and night-time ~~economic, cultural and leisure~~ activities.

Explanation

~~8.51-8.55.~~ Town centres are at the heart of Lewisham's neighbourhoods and communities. They all have distinctive features that reflect and help to reinforce the Borough's character and diversity. Town centres are also a key part of the local economy and important hubs of daytime, evening and night-time 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. The delivery of the spatial strategy for the Borough is dependent on a well-functioning network of town centres and development proposals must therefore demonstrate how they will support their long-term vitality and viability.~~

~~8.52-8.56.~~ 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~~ our latest town centre

Commented [NE246]: These criteria have been moved from QD3 public realm, as they are most relevant to town centres

Commented [NE247]: Respond to consultation – more emphasis on urban greening in town centres

Commented [NE248]: Repetition – main town centre uses set out in A above

~~'health checks', which look at indicators such as vacancy rates, types of business and mix of uses.⁶⁰ It is important~~The Local Plan seeks to prevent ~~against~~ the decline of our high streets and centres ~~and makes clear the integral role they have in supporting Good Growth~~by encouraging the take up of units and ~~appropriately managing uses, along with implementing measures to improve their vitality and viability. It is important that town centres are lively, attractive and inclusive places that people can access safely and easily by foot. Development proposals must therefore respond positively to the character and quality of town centres and secure the delivery of high quality public realm.~~

Commented [NE249]: Updated in line with latest technical evidence base

~~8.57. Equally,~~There is a need to ensure that town centres remain resilient and adaptable to ~~the~~ challenges ~~and opportunities~~ facing the high street. ~~This is particularly in response to including~~ changes in consumer behaviour and ~~modern business activities/practices, including multi-channel (online) shopping, which are creating new challenges. Brexit and Covid-19 have had significant short-term effects on the national, regional and local economies and are likely to have long-term implications, which require monitoring. This is particularly in terms of the retail sector where Covid-19 has led to a spike in town centre vacancies and accelerated trends in~~ Whilst multi-channel (online shopping),⁶¹ ~~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 recognising that the Borough's town centres is crucial~~ play a key role in the provision of local shops and services, ~~we will seek to ensure that it is important that~~ ~~centres~~they are able to evolve and adapt over time, so that they continue to support ~~the our neighbourhoods and communities in which they are situated. The Local Plan provides support for a wide range of uses to locate within town centres as diversification is vital to their revitalisation and long-term resilience.~~

Commented [NE250]: Respond to consultation – to reflect on impact of Covid and Brexit and implications for Local Plan

~~8.53-8.58.~~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 day, ~~time and evening~~ ~~and night-time~~.

⁶⁰ [Lewisham Retail Impact Assessment and Town Centre Trends Report \(2021\) and Lewisham Local Centres Topic Paper \(2020\).](#)

⁶¹ [Lewisham Retail Impact Assessment and Town Centre Trends Report \(2021\).](#)

EC14~~2~~ Town centre network and hierarchy

- A. ~~All new~~ development proposals must support and reinforce Lewisham's town centre network and hierarchy. ~~Proposals will be required to~~ They must demonstrate how they development will maintain and enhance town centre vitality and viability, commensurate with the scale, role and function of the centre, in accordance with Table 8.2, ~~along with responding positively to its distinctive character.~~
- B. A 'town centres first' approach will be used to assess development proposals for main town centre uses, in line with the London Plan and the NPPF. The Sequential Test will be applied to ensure that main town centre uses ~~should be~~ directed to locations within town centres ~~within Lewisham's town centre hierarchy or, if no suitable town centre sites are available or expected to become available within a reasonable period, to appropriate edge-of-centre locations.~~
- C. The Sequential Test will not apply to Class F1 learning and non-residential institutions and Class F2 local community uses, however development proposals for these uses are encouraged to locate in town centres and other well-connected areas.
- D. ~~The Council will seek to resist~~ Development proposals for new main town centre uses in out-of-centre locations ~~retail uses, including retail parks will be refused unless provision has been made for these uses within the Local Plan, including site allocations, or it is clearly demonstrated that no suitable town or edge-of-centre sites are available or expected to become available within a reasonable period. It will investigate the role and function of existing out-of-centre retail parks and other sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy for the Borough.~~
- E. Retail Impact Assessments (RIAs) will be required ~~on~~ to be submitted with development proposals for main town centre uses of 500 square metres gross floorspace or more at edge-of-centre and out-of-centre locations, unless provision for main town centre uses has been made in a site allocation. RIAs should be proportionate to the nature and scale of development. Development proposals will be refused unless an ~~Assessments must~~ RIA demonstrates that:
- There is an identified need and market demand 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.
- B-F. 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. Proposals for new major retail development should prioritise Lewisham and Catford town centres in the site selection process.
- C-G. Development of Lewisham town centre and its surrounds will be proactively managed in order to secure its future reclassification as a Metropolitan centre ~~in the~~

Commented [NE251]: This policy has been moved from former Policy EC12, which has been deleted – see policy for further information.

Commented [NE252]: Response to public consultation – included to provide greater flexibility for community uses to locate within town centres

Commented [NE253]: Amended to ensure consistency with the NPPF and London Plan.

Commented [NE254]: Not required for the Regulation 19 plan

Commented [NE255]: This policy has been moved from former Policy EC12, which has been deleted – see policy for further information.

Commented [NE256]: These floorspace requirements will be subject to review and updating pending outcomes of the Retail Impact Assessment and Town Centre Trends Report.

London Plan. 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.

Commented [NE257]: Respond to consultation – to make clear that it is the role of the London Plan to designate town centres at the higher order of the hierarchy

~~D.A. The Council will seek to resist proposals for new out-of-centre retail uses, including retail parks, unless provision has been made for these uses within the Local Plan, including site allocations. It will investigate the role and function of existing out-of-centre retail parks and other sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy for the Borough.~~

Commented [NE258]: Repetition – this is addressed by the ‘town centres first’ policy above in criteria B

Commented [NE259]: Not required for Regulation 19 plan. A review of out-of-centre retail parks has now been undertaken to inform this local plan.

Figure 8.2: Centre hierarchy

Lewisham Town Centre Network and Hierarchy		
Classification	Location	Role/function
Major town centre	Lewisham Catford	These are Lewisham largest and most well-connected centres with a high PTAL score meaning their catchment goes beyond Lewisham into neighbouring boroughs. They provide the highest proportion of comparison retail compared to convenience retail alongside hosting a range of uses such as offices, civic functions, culture, leisure, entertainment and services.
District town centre	Blackheath Deptford Downham Forest Hill Lee Green New Cross Gate Consolidated Sydenham	Smaller than major centres and spread more evenly across Lewisham, these centres are well connected, serving several local communities. Typically they provide convenience retail with some comparison retail at a smaller scale alongside culture and leisure (e.g. café, restaurants and swimming baths), services (e.g. banks) and local office functions. Some centres, however, have developed specialist shopping functions such as independent boutique shopping for instance. At the same time, others are known for their role within the creative sector or having a lively night-time economy.
Local centre (formerly neighbourhood local centre)	Bellingham New Brockley Cross Burnt Ash - New Crofton Park Downham Way	Found within various areas of Lewisham with decent transport links, these smaller centres serve the surrounding neighbourhood and

Commented [NE260]: This will be subject to review and potential updating pending outcomes of the Retail Impact Assessment and Town Centre Trends Report – to identify whether there is scope to designate a new town centre at Bell Green, and if so, what classification in the hierarchy is appropriate

	Staplehurst Road -New Honour Oak / Brockley Rise - New Grove Park Ladywell -New Lewisham Way New Cross Road -New (changed from District) Upper Sydenham/Kirkdale -New	complement the larger major and district centres. They consist of a small cluster of shops typically offering convenience retail (e.g. small supermarket up to around 500sqm) and services (e.g. Pharmacy and Hairdressers) together with a community anchor (e.g. Public House, Church or Cinema) attracting visitors.
Shopping parade	There are over 80 parades dispersed across the Borough	Scattered throughout Lewisham, they have been included for their role in complementing other centres higher up the hierarchy. Consisting mainly of smaller scale convenience retail (e.g. corner shops) they play a role in providing day-to-day access to some necessities within a short walking distance of residents nearby.

Figure: Major and District Centres with town centre boundaries and Primary Shopping Areas

Explanation

8.54-8.59. 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 Metropolitan, Major and District town centres whereas Local Centres are designated by the Local Plan. 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.

8.55-8.60. ~~All new development proposals is expected to must help to~~ facilitate the delivery of the Borough's spatial strategy by supporting and reinforcing Lewisham's town centre network and hierarchy. ~~Proposals will need to reflect the~~ The nature and mix of uses along with the design of development should be commensurate with the main development principles for each of the scale, role, function and character of a town centres within the hierarchy. This means having regard to ~~Development proposals must clearly demonstrate how they will support town centre vitality and viability by responding positively to the distinctive character and unique role of each a centre in supporting the neighbourhoods and communities within their its catchment, both which may cover areas both~~ within and outside of the Borough.

Commented [NE261]: Policy supported text amended throughout to make more concise and align with changes to policies above

8.56. 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.

8.57-8.61. Lewisham town centre is a key focal point of the Borough's and is its principal shopping and leisure destination as well as a strategic 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 has been identified as a 'strategic interchange' in the London Mayor's transport strategy.⁶² 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.

8.62. Catford town centre is distinguished by its unique civic and cultural functions along with a distinctive character, including heritage assets. The Local Plan seeks to reinforce and build upon its strengths through targeted regeneration and renewal, aided by including investment in strategic new and improved transport infrastructure and significant public realm enhancements. The Council is preparing a masterplan for Catford Town Centre Framework (2021) sets out a vision and strategy to make the town centre London's greenest, which has both informed and will help to support the delivery of the Local Plan.

8.63. Part 3 of the Local Plan includes additional policies for the Borough's Major, District and Local centres. It sets out how new development within these centres will be managed in order to facilitate the delivery of sustainable neighbourhoods consistent with the spatial strategy for the Borough. Site allocation policies have been included for strategic development sites within and at the edge of town centres.

8.64. 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 or if necessary, appropriate edge-of-centre locations (unless provision for such uses have been made elsewhere by the Local Plan). Development proposals will be assessed in accordance with the sequential approach Test to site selection set out in national planning policy the NPPF and London Plan.

8.65. Outside of designated centres, Retail Impact Assessments will be required for proposals of 500 square meters gross floorspace or more, unless provision for retail uses has been made through a Local Plan site allocation. This local

Commented [NE262]: Repetition – the London Plan provides details on the nature, role and function of centres in the town centre hierarchy

⁶² Mayor's Transport Strategy (2018). Greater London Authority.

threshold is more rigorous than that set by national policy and is informed by Lewisham's Retail Capacity Study Update (2019) local evidence.⁶³ 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.

Commented [NE263]: Supporting text moved from former Policy EC12, which has been deleted.

~~8.58-8.66. For the Sequential Test, flexibility will be applied to proposals for commercial uses in the B1 Use Class E(g) office uses, recognising that these uses will also be acceptable in designated employment areas, consistent with Policy EC32 (Location and design of Protecting employment land and delivering new workspace).~~

Commented [NE264]: Amended to reflect appropriate uses in light of new Use Classes Order

~~8.59-8.67. With the levels of growth planned in the Borough up to 2040, it is important that neighbourhoods are supported with good 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).⁶⁴~~

Commented [NE265]: These future floorspace requirements will be subject to review and updating pending outcomes of the Retail Impact Assessment and Town Centre Trends Report.

~~8.60-8.68. The study also identifies that the majority of this floorspace can be accommodated in Lewisham and Catford Major Centres (recognising that significant new development of main town centre uses has been committed through consented schemes in Mixed-use Employment Locations). The Council will monitor progress towards the delivery of this requirement through the Authority Monitoring Report process.~~

~~8.61-8.69. There are established out-of-centre retail parks and 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.⁶⁵ Indeed, it forecasts a future reduction in the need for out-of-centre retail floorspace.~~

Commented [NE266]: This will be reviewed and updated pending outcomes of the Retail Impact Assessment and Town Centre Trends Report.

~~8.62. 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~~

⁶³ The Lewisham Retail Impact Assessment and Town Centre Trends Report (2021) concludes that the 2,500 square metre gross threshold set in national policy is inappropriate for Lewisham and that a lower threshold should be used.

⁶⁴ 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.

⁶⁵ The Retail Capacity Study Update (2019) acknowledges that a significant amount of new out-of-centre development at Mixed-use Employment Locations (such as Convoys Wharf and Surrey Canal Triangle) is in the pipeline, but has not yet been delivered.

~~will investigate the role and function of existing out-of-centre retail sites in order to identify future opportunities to optimise the use of land to deliver the spatial strategy. This includes opportunities that may arise through planned strategic infrastructure investment, particularly in respect of any future commitments to the Bakerloo line extension.~~

~~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:~~

- ~~a. Are compatible with the scale, role, function and character of the centre and its catchment;~~
- ~~b. Sustain and enhance the vitality and viability of the centre; and~~
- ~~c. Respond positively 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, or within site allocations where provision for main town centre uses has been made, 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.~~

~~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, unless provision for main town centre uses has been made in a site allocation. 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~~

~~8.63. 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. Unless provided for by site allocations policies, 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.~~

~~8.64.~~

Commented [NE267]: Not required for Regulation 19 plan. A review of out-of-centre retail parks has now been undertaken to inform this local plan.

Commented [NE268]: Repetition - policy removed to make the plan more concise. This policy deals with the 'sequential approach' to the location of main town centre uses, which is firmly established both by the NPPF and the London Plan. Parts of this policy are retained and brought into EC11 Town centre network and hierarchy; to refer to the sequential approach and a local threshold for triggering Retail Impact Assessments

~~8.65. 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.~~

~~Outside of designated centres, retail impact assessments will be required for proposals of 500 square metres gross floorspace or more, unless provision for retail uses has been made through a Local Plan site allocation. This local threshold is more rigorous than that set by national policy and is informed by Lowisham's Retail Capacity Study Update (2010). It provides wider scope for the consideration of proposals that could adversely impact on Lowisham's town-centre hierarchy and compromise delivery of the spatial strategy.~~

~~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 ~~and at edge-of-centre locations~~ by:
- Delivering new mixed-use schemes on individual sites and through comprehensive redevelopment of multiple sites, where appropriate;
 - Investigating opportunities for the reuse and reconfiguration of existing space, or the provision of new additional space above or below ~~shops and commercial premises~~ units; and
 - Avoiding designs that comprise of single-storey development.
- B. Within town centres ~~and edge-of-centre locations~~, ~~proposals for new~~ mixed-use development ~~proposals~~, (including ~~development involving~~ the expansion, reuse or reconfiguration of existing ~~floorspace~~), will be considered having regard to:
- The role and function of the centre;
 - Impact on town centre vitality and viability;
 - Compatibility of the proposed use with adjoining and neighbouring uses, both in terms of land use and character; and
 - Compliance with other policies.
- C. Subject to (A) and (B) above, where a ~~development~~ proposal includes a residential use the development must:
- Not adversely impact on the function, appearance and character of the town centre, including its shopping and other frontages; and
 - Provide adequate access arrangements for all of the building occupiers including separate secured access for the residential element.

Commented [NE269]: Policy amended to refer to edge-of-centre locations as these can be appropriate for main town centre uses, following the sequential approach set out in Policy EC12 Town centre network and hierarchy

Commented [NE270]: As above

D. Development proposals ~~involving-affecting an~~ existing ~~retail-and~~ commercial unit ~~s~~ ~~should-must~~ ensure any ancillary floorspace that is integral to business operations and viability of ~~workspace-the unit (such as space for storage and back-office functions)~~ is not compromised or lost.

Explanation

~~8-66-8.70. It is important that Lewisham's town centres are managed positively 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. Town centres are key locations for supporting growth and regeneration in Lewisham and provide unique opportunities for new development to optimise the use of land.~~ This includes backland and infill sites, 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.

~~8-67-8.71. Development p~~Proposals for new single-storey development within and at the edge of town centres will be strongly resisted ~~given the imperative to make efficient as this form of development is not considered to make the optimal~~ use of the Borough's limited land supply. This is ~~particularly in accessible because~~ town centres are locations that are better suited to a wider mix of uses and where higher levels of density are normally 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~~ must provide a statement and supporting evidence to clearly justify ~~ing~~ why a multi-storey development is not appropriate or deliverable. Where Viability Assessments are submitted they must be independently appraised and verified by a Royal Institution of Chartered Surveyors (RICS) professional.

~~8-68-8.72. Mixed-use development may involve the intensification or reconfiguration of existing buildings and sites. We have set~~Development and design parameters for strategic town centre sites are included in Part 3 ~~and the site allocation policies of this the~~ 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 higher density 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 and~~ complying with other policies.

~~8-69-8.73. All development proposals, including changes of use, should ensure that any~~ the amount and quality of ancillary floorspace within a commercial unit is retained or enhanced. This includes space for storage, back office functions and amenities, such as toilets and cleaning facilities. It is important that development

Commented [NE271]: Policy supporting text amended throughout to make more concise.

Commented [NE272]: Amended to ensure that Viability Assessments are independently appraised

does not compromise the continued business operation or long-term viability of existing commercial premises, whether through the reconfiguration of space or site redevelopment.

~~8.70. 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 proposals within and at the edge of a Major and/or District centres must support demonstrate how they will support the vitality and viability of the town centres and make a positive contribution to their local character, with reference to Policy EC11 (Town centres at the heart of our communities). 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 (PSAs) are the locations within Lewisham's Major and District centres where retail uses are and should be concentrated. Development proposals should support the retail function of the PSA. For new Class E(a) retail uses retail development are encouraged to locate in the Primary Shopping Areas PSA in order to support and enhance town centre vitality and viability through the provision of a these complementary clusters of retail uses.~~

- C. ~~Development proposals for Class E and main town centre uses which do not contribute to the retail function of the PSA at the ground floor level must submit a Shopping Area Impact Statement. The statement must demonstrate that the development, whether individually or cumulatively with others, will support the retail function of the PSA and will not result in an unacceptable adverse impact on it by:~~
- ~~a. Contributing to the vitality, viability, vibrancy and character of the PSA, including by ensuring that a range of consumer goods remain available within it, taking into account the role and function of the centre in the hierarchy;~~
 - ~~b. Providing an appropriate main town centre use at the ground floor level that will attract visitors and generate footfall within the PSA;~~
 - ~~c. Providing a positive frontage along with an active ground floor frontage in order to ensure that there is no excessively harmful break between retail uses and the continuity of the active frontage; and~~
 - ~~d. Ensuring local amenity is not unreasonably harmed by increased noise, odour, fumes and other nuisances.~~

Commented [NE273]: Repetition – this is covered by the spatial strategy and elsewhere in the plan

Commented [NE274]: The policy has been subject to significant revision throughout owing to the introduction of new planning legislation. This includes changes to the Use Classes Order which has extended the scope of permitted development rights; this effectively allows greater flexibility for changes between different uses and limits the ability of the Local Plan to control the specific mix of uses within town centres, such as retail

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

Commented [NE275]: Amended to reflect appropriate uses in light of new Use Classes Order

~~B-D. In Lewisham and Gatford Major town-centres, development proposals should ensure that Class A1 (retail) uses in support the role and function of the centre by contributing to the target for the Primary Shopping Areas PSA are to maintained at a minimum of 50 per cent of retail uses, 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. Development p~~Proposals that will result in the percentage of A1 retail uses in the PSA falling below this threshold target will only be supported where the retail function of the PSA will not be adversely impacted, with reference to (C) above:

- ~~a. 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;~~
- ~~b. 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.~~

~~C. 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.~~

~~D. In Sydenham District Centre, development proposals will be considered against the requirements set out in (C) above.~~

E. Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the PSA. Where retail development is conditioned for that use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6-months at a reasonable market value for rent or sale to the local area. Shopping Area Impact Statements must be submitted with applications for changes to a non-retail use where appropriate, with reference to (C) above.

Commented [NE276]: As above, the policy has been amended in response to changes in planning legislation. Where the Council can exercise control (i.e. when new development proposals come forward) the Local Plan seeks that Lewisham major centre retains a target of 50 per cent retail uses, given its role as the principal town centre in the hierarchy. This is the only town centre for which a target is set, recognising that flexibility should be provided elsewhere to support the economic recovery and town centre viability.

The wider town centre area

~~E.F.~~ Within ~~the a~~ Major ~~or~~ 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 will~~ not result in a harmful overconcentration of similar uses, having regard to Policy EC17 (Concentration of uses); ~~and~~
- b. ~~They provide a positive frontage including~~ ~~An an~~ active ground floor frontage ~~is provided at the ground floor level;~~ or if it can be suitably demonstrated that this is not possible, a window display or other appropriate positive frontage at the ground floor; and
- ~~b.c.~~ They comply with other Local Plan policies.

~~F.G.~~ ~~Development p~~Proposals for residential ~~units-uses~~ on the ground floor level or below, both within the ~~Primary Shopping Areas~~PSA 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.

Explanation

~~8.74-8.74.~~ This policy ~~defines designates~~ the Primary Shopping Areas within Lewisham's Major and District Centres, which are ~~reflected shown~~ on the Policies Map.⁶⁶ ~~Primary Shopping Areas~~PSAs are characterised by their predominantly retail ~~function role and character~~ 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~~The Local Plan seeks to ensure that the retail functional integrity of these areas is maintained and enhanced, ~~so~~ to support the long-term vitality and viability of the town centres.

8.75. The Local Plan provides flexibility for a wide range of commercial, leisure, community and cultural uses to locate within town centres. It is nonetheless important that a critical mass of retailing uses is-are maintained within ~~the Primary Shopping Areas~~PSAs to reinforce their retail role and character as well as to ensure people have access to a range of consumer goods. ~~All Development~~ proposals for Class A4 E(g) retail uses ~~should seek to are~~ strongly encouraged to locate within these areas, and oOnly when suitable sites are not available ~~here~~ within PSAs should other town centre locations be considered in the site selection process.

8.76. New planning legislation has resulted in updates to the Use Classes Order and the creation of a new Class E which brings together a range of commercial,

⁶⁶ Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020). This shows the proposals to designate new Primary Shopping Areas and to remove existing designated Primary and Secondary Shopping Frontages in Major and District town centres.

Commented [NE277]: The policy supporting text has been amended throughout to align with changes to the policies above

business and service uses, including retail.⁶⁷ This provides additional flexibility for the commercial market by expanding the scope of Permitted Development rights, meaning changes between Class E uses do not require planning permission. The Council recognises the benefits of the new Class E which can help landowners and leaseholders to quickly respond to market signals and keep business units in viable use. At the same time it is seeking to ensure the retail function of a PSA is not compromised to the extent that it adversely impacts on town centre vitality and viability, or the Council's ability to plan positively for identified needs for retail floorspace over the plan period.

8-72-8.77. Shopping Area Impact Statements are an important tool to assess the impact of a development proposal on the retail function of the PSA. They must be submitted with all applications for uses within the PSA that do not contribute to its retail function (i.e. uses which are not Class E(a) uses). The level of detail included within a statement should be commensurate with the nature and scale of the development proposed. When assessing impacts on the PSA consideration will be given to the existing mix of uses within the PSA to establish whether the development will significantly diminish the availability of retail uses and people's access to consumer goods. The Council's latest Authority Monitoring Report should be referred for information on the mix of uses in the PSA, however applicants may need to undertake surveys to ensure decisions are informed by up-to-date information. Where non-retail uses are introduced in the PSA they must be for appropriate main town centre uses, be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units. This will help to attract visitors and generate footfall which in turn can support the viability of existing retail uses and the PSA more generally.

8-73-8.78. Lewisham Major Centre is the Borough's principal town centre and a key visitor destination. Local evidence⁶⁸ indicates that town centres in Lewisham's 'central area' make a significant contribution to the Borough's retail floorspace capacity and will play a role in future needs over the plan period. Lewisham Shopping Centre comprises a large part of the Major Centre's PSA and contains its main concentration of retail uses. To support the continued retail function of the PSA within the Major Centre, a target threshold approach will be used to help manage the mix and balance of uses within ~~the Major Centres of Catford and Lewisham~~, so that Class A1 (retail) uses form the majority of uses within the Primary Shopping Areas PSA. ~~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% target 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 PSA can retain ~~their~~ its principal retail function and provide sufficient capacity to help meet Lewisham's future floorspace needs.

⁶⁷ This includes changes to the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 and amendments to the Town and Country Planning (General Permitted Development) (England) Order 2015.

⁶⁸ Lewisham Retail Impact Assessment and Town Centre Trends Report (2021).

~~Development p~~Proposals that ~~would will~~ result in the overall percentage of retail uses falling below this ~~minimum level~~threshold target will be resisted. ~~H~~However, ~~some flexibility may will~~ be applied where it can be suitably demonstrated ~~that the viability and vitality of the PSA will not be adversely affected 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.~~

~~8.74. 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.~~

~~8.75. 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.~~

~~8.76. 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.~~

~~8.77-8.79. 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~~

Development proposals must therefore be designed with positive frontages and maintain a contiguous active ground floor frontage with adjoining units, would result in avoiding harmful breaks of the retail frontage (normally 3 or more adjoining non-retail uses), also taking into account the prevailing character of the streetscape and townscape. Active frontages should be associated with the use itself or where this is not possible or suitable, through a window display or other feature creating visual interest. This is necessary to ensure development it must demonstrably improve/supports town centre vitality and viability, such as by introducing a use that encourages linked trips or improves townscape and amenity by providing more active shopfronts/uses at the street level.

~~8.78. 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.~~

~~8.79-8.80. 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.~~

~~8.80-8.81. Within town centres development proposals for residential uses on ground floor or basement levels are not considered appropriate and will be resisted. This is owing to the detrimental impact these uses/the introduction of housing at the street level 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 proposals within and at the edge of a Local Centres must demonstrate how they will support the vitality and viability of the centres and make a positive contribution to their/its local character, with reference to Policy EC11 (Town centres at the heart of our communities). 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, Development proposals incorporating with smaller and moderately sized units for retail use, are encouraged to locate in Local Centres. Where such provision already exists, this should be protected wherever possible in order to ensure a balanced mix of shops and complementary services, community and cultural facilities/main town centre uses.~~
- C. Major development proposals within a Local Centre must make provision for a reasonable amount of small or moderately sized units suitable for micro, small and independent businesses. Where an end-user has been secured for immediate

Commented [NE278]: The policy has been subject to significant revision throughout owing to the introduction of new planning legislation. This includes changes to the Use Classes Order which has extended the scope of permitted development rights; this effectively allows greater flexibility for changes between different uses and limits the ability of the Local Plan to control the specific mix of uses within local centres, such as retail

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

~~occupation on the development's completion and requires a larger unit or floor plate, this should be flexibly designed to enable sub-division into smaller units in the future.~~

Commented [NE279]: Respond to consultation – provision should be made to support small and independent businesses

- ~~B-D.~~ Development proposals involving the ~~loss of Class A1 retail~~ change of uses from Class E to other main town centre uses within Local Centres will only be supported where it is demonstrated that:
- ~~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.a.~~ The replacement use is an appropriate main town centre, community, cultural or employment generating use; and
 - ~~e-b.~~ An active frontage is provided at the ground floor level or where if it can be suitably demonstrated that this is not suitable possible a window display or other positive frontage.

- ~~C-E.~~ Development pP 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 be permitted~~ where:
- ~~a.~~ It is demonstrated through a robust and recent marketing exercise, of a minimum continuous period of two-years, at a reasonable local market value for rent or sale, 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 will~~ be no adverse impact on local area character, ~~including and~~ the continuity of the shopping frontage in the Local Centre.

- ~~D-F.~~ Planning conditions may be used to secure Class E(a) uses that contribute to the retail function of the Local Centre. Where retail development is conditioned for that use, development proposals seeking a change to another appropriate main town centre use, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 6-months at a reasonable market value for rent or sale to the local area.

Explanation

- ~~8.81-8.82.~~ 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. They also feature at least one community facility that provides a focal point for community activity and helps to attract visitors. Local centres ~~are particularly important for less mobile members of the community;~~ support sustainable neighbourhoods by enabling people to walk or cycle to access goods, services and facilities. They can be particularly beneficial to those with reduced mobility, including the elderly and older people with mobility issues, who may be not be able to visit larger town centres on a regular basis.

Commented [NE280]: The policy supporting text has been amended throughout to align with changes to the policies above

Commented [NE281]: Included to appropriately reflect the criteria used to inform the designation of Local Centres, as set out in the Council's Local Centres Topic Paper 2020

- ~~8.82.~~ 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 8.2 (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.⁶⁹

Commented [NE282]: Not required for the Regulation 19 plan

8.83. Development proposals for retail uses consisting of smaller and moderately sized units and floor-plates are encouraged to locate in District Local Centres. Where such shopping provision already exists, this should be protected wherever possible in order to ensure that centres accommodate a balanced mix of main town centre uses and to support the role and function of the centre. 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. However it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development proposals for the change of use from Class E must be for appropriate main town centre or employment generating uses.

8.84. Local Centres are smaller in scale than Major and District Centres and therefore provide unique opportunities for accommodating micro, small and independent businesses. Major development proposals must, and all other developments should seek to, integrate a reasonable amount of small units or space suitable for these types of businesses. This can include dedicated units or flexibly specified space that can be easily sub-divided. What constitutes a reasonable amount will be considered on a case-by-case basis.

Commented [NE283]: Additional supporting text for new policy criterion C above

8.83-8.85. In order to support the role and function of Local Centres the Council may use planning conditions to secure retail uses where new development comes forward. Local Centres vary in terms of their size and catchment, provision of shops and services, and local character. The need for or loss of retail uses will therefore affect centres differently, for example, losses may be felt more acutely in smaller centres. The Council will therefore consider the need for conditions on a case-by-case basis. Where retail uses have been conditioned and a change of use is sought, applicants must demonstrate that reasonable efforts have been made to retain the unit in retail use in the first instance.

⁶⁹ Further information is set out in the accompanying Schedule of Changes to the Policies Map (2020), as well as the Local Centres Topic Paper (2020).

~~8.84-8.86.~~ Positive street frontages and active ground floor frontages are vital to ~~maintaining~~ the vibrancy and character of Local Centres. ~~All development proposals~~ must make a positive contribution to the townscape and ~~interface well~~ create a coherent relationship with the street-level activity. ~~Where a new non-retail use is introduced within a frontage it will be required to~~ Development proposals, including changes of use, must maintain the continuity of frontages in the centre and not result in a harmful fragmentation of the frontage, whether individually or cumulatively with other developments. Development proposals must provide an active ground floor frontage, preferably associated with the use itself and where this is not ~~suitable~~ possible through a window display or other feature creating visual interest.

~~Development proposals for the~~ conversion of a main town centre uses at the ground floor level or below to a residential use will be strongly resisted. This is in order to protect the function of Local Centres and the character of their townscape. Only where it can be suitably demonstrated through ~~an active-robust and recent~~ marketing exercise that there is no continued demand for the existing or an appropriate ~~alternative-main town centre~~ use will such 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 in the frontage:' 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.

8.87.

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 of ~~Town Centres~~ Major, District and Local Centres) provide important day-to-day provision of consumer goods within Lewisham's neighbourhoods and should be protected wherever possible.

A.B. Development proposals involving the ~~loss of Class A1 retail~~ change of use from Class E to other main town centre or appropriate employment generating uses at these locations shopping parades, corner shops and other service points will only be supported where it is demonstrated that:

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.a. Similar alternative provision is available within the local area a which can be reached safely, easily and conveniently by comfortable walking distance, normally within 400-800 metres; and ~~The replacement use is an appropriate main town centre, community or employment generating use;~~ and

e.b. An active frontage is provided at the ground floor level, or ~~where if it can be~~ suitably demonstrated this is not ~~suitable~~ possible a window display or other positive frontage.

Commented [NE284]: The policy has been subject to significant revision throughout owing to the introduction of new planning legislation. This includes changes to the Use Classes Order which has extended the scope of permitted development rights; this effectively allows greater flexibility for changes between different uses and limits the ability of the Local Plan to control the specific mix of uses within shopping parades, such as retail

Respond to consultation - comments also reflected that the Local Plan needs to be amended to respond to these changes in legislation

~~B-C. Outside of Town Centres and Local Centres, At shopping parades, corner shops and other service points development 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 be permitted where:~~

~~a. It is demonstrated through an active a robust and recent marketing exercise, of a minimum continuous period of one-year at a reasonable local market value for rent or sale, 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 will be no adverse impact on local area character, including and the continuity of the frontages within the shopping parade or other frontages.~~

~~D. Where a development proposal involving a main town centre use is located outside of a Major, District or Local Centre and satisfies the Sequential Test, the Council may use planning conditions to secure an element of Class E(g) retail uses. This in order to ensure provision of essential daily consumer goods in the area where there is an identified need.~~

Explanation

~~8.85-8.88. There are a number of shops and services located outside of the designated town and local centres. These which are dispersed across the Borough in shopping parades, at corner shops and other locations. These shops support Lewisham's neighbourhoods and 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 types of uses are distinguished from units in those located 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.~~

~~8.86-8.89. Given the context of growth within the Borough and future demand for retail provision, we will seek to ensure that it is important that people in the Borough have easy access to essential day-to-day consumer goods. Development proposals should therefore seek to retain shops outside of centres are retained wherever possible. However it is recognised that the new Class E category provides greater flexibility for changes from retail to other commercial, business and service uses. Where planning permission is required, development proposals involving for the change of use from Class E to other appropriate main town centre or employment generating uses will only be considered permitted 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~~

Commented [NE285]: The policy supporting text has been amended throughout to align with changes to the policies above

~~support Development~~ proposals for alternative employment generating or community uses that are compatible with the local area will be supported in order to secure the viability of existing units and buildings.

~~8.87-8.90.~~ 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 their functional integrity, viability 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 at a reasonable local market rate for rent or sale.

8.91. All changes of use must maintain the continuity of frontages in the shopping parade or other frontages ~~in the locality.~~ ~~We will resist Development~~ proposals ~~that must not~~ 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~~ must 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.

~~8.88-8.92.~~ In order to ensure that people in Lewisham have easy access to essential day-to-day consumer goods, the Council may use planning conditions to secure new retail uses for development located in in areas where there is an identified need for this provision. Local need will be assessed on a case-by-case basis having regard to the availability of retail uses within 400 to 800 metres radius of the proposed development site, which is roughly equivalent to 5 to 10 minutes walking distance. Development proposals are strongly encouraged to consider the need for provision of essential goods, particularly in areas which do not benefit from good levels of public transport access.

EC 17 Concentration of uses

A. ~~All development should contribute to the delivery of inclusive and mixed neighbourhoods and communities, including by supporting the vitality and viability of the Borough's town centres. Development p~~Proposals ~~will be resisted where they must not~~ 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).~~ the following Sui Generis uses:

- a. Hot food takeaways;
- b. Betting offices, casinos and bingo halls;
- c. Payday loan shops
- d. Pawnbrokers;
- e. Nightclubs and dance halls; and

Commented [NE286]: Repetition – this is set out elsewhere in the plan.

f. Drinking establishments.

Commented [NE287]: Amended for clarity and to aid policy implementation – makes clear the specific uses to which policy applies

B. The harmful overconcentration of uses will be assessed having regard to the basis of the number of units similar uses within a 400 metre radius of a proposed the development site, and where:

- a. The vitality and viability of the town centre will be adversely impacted, taking into account the function of the centre in the hierarchy; and
- b. The character of the area has changed or local amenity has been adversely impacted as a result of:
 - i. Increased noise, odour, fumes and other nuisances;
 - ii. Traffic generation including from taxis, private hire and servicing vehicles;
 - iii. Inadequate provision of waste management and recycling facilities;
 - iv. Anti-social behaviour and public safety.

Commented [NE288]: Amended for clarity and to aid policy implementation – sets the criteria against which a harmful overconcentration will be assessed

A.C. Applications Development proposals for uses listed in (A) must be accompanied by submit sufficient information to allow for an assessment of the concentration and potential impacts arising from the use of uses, in line with the criteria in (B) above.

Hot food takeaways

B.D. In addition to complying with (A) and (B) above, development pProposals for hot food takeaways (Use Class A5) will only be supported-permitted where it is demonstrated that:

Commented [NE289]: Amended to ensure 'policy tests' for assessing concentration of uses in B above also apply to takeaways

- a. They will not result in a harmful overconcentration of uses, having regard to (A) and (B) above;
- b.a. They are located at least 400 metres away from the boundary of an existing or proposed primary or secondary school; and
- b.b. The proportion of hot food takeaways premises in the shopping frontage complies with the thresholds set out in Table 8.3.

Commented [NE290]: Amended to ensure schools which have been consented but not yet built are considered in planning decisions

Food and drink services

C.E. All dDevelopment proposals for uses involving the service of food and drink must make adequate arrangements to protect the and manage local amenity-of adjoining and neighbouring properties, in line with Policy QD79 (Amenity and agent of change).

D.F. Where development 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.

Table 8.3 Shopping frontage threshold for takeaways	
Location	Threshold applied
Primary or secondary School	400m away from school boundary
Major / District Centre	Proportion of <u>A5 uses premises</u> does not exceed 5% of units

Local Centre	Proportion of A5 uses premises does not exceed 10% of units
Shopping Parade (20 units or more)	Maximum of 2 units in A5 use premises
Shopping Parade (19 units or less)	Maximum of 1 unit in A5 use premise

Explanation

~~8.89. 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.~~

~~8.90-8.93. Town centres are at the heart of Lewisham's neighbourhoods and communities. Their vitality and viability relies heavily on the presence of a mix of uses and activities. It is important that development proposals that are likely to do not result in a harmful concentration or saturation of similar uses in a locality, including within town centres, will be resisted of uses. This is especially for certain Sui Generis Uses, whose proliferation can also adversely impact on local character, amenity, public health and safety. 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.~~

~~8.91-8.94. In assessing whether development 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 lead to a harmful overconcentration of uses, we will use the policy criteria above. 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 development 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 Development proposals must have particular regard to the Borough's more areas experiencing significant deprivation⁷⁰ deprived areas, where the impacts of some uses may be more pronounced.~~

~~8.92. Town centres are now accommodating a wider range of services and facilities that complement their traditional retail function. This extended offer includes food~~

Commented [NE291]: Policy supporting text amended throughout to make more concise and to reflect changes to criterion B above.

Commented [NE292]: Amended for clarity and to aid policy implementation

⁷⁰ For policy implementation this should be taken as an indicative benchmark of the 20 per cent most deprived areas, in accordance with the Government's latest Indices of Multiple Deprivation (IMD).

~~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.~~

~~8.93-8.95.~~ 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 Sui Generis~~ uses, ~~both around schools and within town centres.~~

~~8.94-8.96.~~ 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. ~~Development p~~Proposals ~~will be expected to~~must 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.

~~8.95-8.97.~~ 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 Class E business uses such as~~ 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.

Commented [NE293]: Amended to reflect appropriate uses in light of new Use Classes Order

Figure 8.3 – Strategic areas of night-time activity and Cultural Quarters

EC 18 Culture, creative industries and the night-time economy

Cultural and creative industries

A. 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 support 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 applying the Agent of Change) principle;
- 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 22DM5 (Meanwhile uses); and
- e. Facilitating~~Facilitating~~Enabling the provision of high quality, fast and reliable digital infrastructure, in line with Policy TR7 (Digital and communications infrastructure and connectivity).

B. The Lewisham North Creative Enterprise Zone (CEZ) is designated in the Local Plan. Development proposals will be expected to~~will be expected to~~should 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).

Commented [NE294]: This has been moved from Policy EC1 A thriving and inclusive local economy

Cultural quarters

A.C. Lewisham benefits from the presence of Cultural Quarters comprising local clusters of complementary 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.D. ~~Proposals for e~~Cultural, community and commercial uses ~~within Cultural Quarters~~ will be encouraged and supported within Cultural Quarters, 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~~a Cultural Quarter. Development proposals that ~~would will~~ adversely impact on the distinctive character and function of ~~the a~~ Cultural Quarter will be ~~strongly resisted~~refused.

C.E. Temporary activities and meanwhile uses (such as festivals, markets, exhibitions, performances and other cultural events) will be supported within Cultural Quarters, ~~with reference to Policy DM5 (Meanwhile Uses) where these will not have an adverse impact on local amenity, public safety and the highway network or compromise the function of employment locations.~~

Evening and night-time economy

D.F. Evening and night-time economic activities should make a positive contribution to the neighbourhoods 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 and other employment areas; and

- 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.G.~~ Development pProposals for evening and 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:
 - iv. District centres of Deptford and Forest Hill.

~~F.H.~~ Development pProposals for evening and night-time economic activities located outside of town centres will only be supported where ~~it can be shown that the use(s) will complement and not undermine existing venues in~~ adversely impact on the town centre locations network and hierarchy.

~~G.I.~~ All Development proposals for evening and night-time economic activities must demonstrate that they:

- a. Will ~~not result in an unacceptable impact on the protect, manage and not adversely impact on local 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, with reference to Policy EC17 (Concentration of uses);~~
- c. Are located in well-connected 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.

Commented [NE295]: Repetition – this is covered in criterion F above and elsewhere in the plan

Explanation

Cultural and creative industries

8.98. Placeholder - supporting text to be included

Cultural Quarters

~~8.96-8.99.~~ Lewisham benefits from the presence of its distinctive Cultural Quarters.

These are local concentrations of complementary cultural, community and commercial activities and feature a key community anchor, such as an education or cultural institution. ~~The~~ Cultural Quarters reflect the unique character and diversity of the Borough, along with performing important economic, cultural and social functions. ~~The~~ is policy designation of the Cultural Quarters helps to formalise and seeks to build on the existing reinforce and enhance the character

and mix of 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~~Additional policies for Cultural Quarters are set out in ~~the character area section in~~ Part 3 of the Local Plan.

~~8.97. 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.~~

Commented [NE296]: Removed to make more concise – these points are covered elsewhere in the policy and plan

Evening and night-time economy

~~8.98.8.100.~~ 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 Use Class A-E (retail) (Commercial, business and service) and D2 (assembly and leisure) Use Classes, along with some Sui Generis uses (such as night clubs, drinking establishments, public houses, cinemas, theatres and performance venues). 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 neighbourhoods and town centres that can both anchor and benefit from night-time activities.

~~8.99.8.101.~~ The ~~draft~~ London Plan identifies several categories of night-time economy clusters across the Capital. ~~It recognises that~~ Lewisham ~~is host~~ ~~to~~contains several Major and District Centres that exert “more than local significance” in this function, including Lewisham, Catford, Blackheath, and New Cross. ~~The Local Plan also designates~~ ~~We also recognise the important role of~~ the Deptford and Forest Hill District Centres as areas with “local significance”, ~~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 economy and cultural ~~capital~~offer.

~~8.100.8.102.~~ 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 viability and local amenity.

~~8.104-8.103.~~ Development pProposals for night-time economic activities at out-of-centre locations ~~are generally discouraged~~should be avoided. ~~They should only be taken forward~~They should only be considered when it is demonstrated through the Sequential A approach that no suitable town centre sites are available, ~~or the use would be more appropriately located in a designated employment area~~. This will help to avoid situations where out-of-centre clusters of activity develop cumulatively over time as these ~~threaten to can~~ undermine the viability and vitality of town centres, ~~as well as the viability of the established economic and cultural facilities within them~~. ~~However, we will allow some~~This policy provides 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 T~~ temporary consents may be used so that we can in order to monitor and review impacts over time.

~~8.102-8.104.~~ Irrespective of site location all development for Development proposals for night-time economic activities ~~y~~ must ~~benefit from good public transport accessibility~~be located in well-connected areas. This includes options for night-time public transport such as the Night Bus or Overground Night Service – the strategic designated night-time clusters are already serviced this way. Development pProposals ~~are also encouraged to~~should incorporate public realm ~~treatments~~enhancements, including appropriate external 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 and facilities.

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:
- 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;
 - 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
 - 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 by the Council, development proposals ~~will be expected to~~must 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

~~8.103-8.105.~~ 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.

~~8.104-8.106.~~ 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, evening and night-time economy. Lewisham, like many other London Boroughs, has experienced a decline in public houses over time. Recognising the important social and economic role they play, we will seek to guard against the loss of these community and cultural facilities. Particular consideration will be given to the need to protect purpose built, historic pubs (built in the 20th Century or earlier), especially where these are landmark features in the townscape or sited at prominent positions, within town and local centres or elsewhere in the Borough.

~~8.105-8.107.~~ 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~~ Applications must provide full details of patronage levels and trading accounts over the past 3 years, including accounts from previous management where appropriate. In addition, ~~applicants applications~~ 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. Development pProposals will be ~~resisted~~ refused where there is good reason to believe that the viability of the pub has been compromised by deliberate neglect or mismanagement.

~~8.106-8.108.~~ 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 development 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.

~~8.107-8.109.~~ Where sites are proposed to be 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. Development pProposals 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.

~~8.108-8.110.~~ 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, development 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~~ must retain the building and any ancillary land or other features, where these makes a positive contribution to local character.

~~8.109-8.111.~~ 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.

~~8.110-8.112.~~ To support the implementation of this policy, ~~we have the Local Plan sets~~ out marketing requirements for **development** proposals affecting public houses ~~in an (Appendix 5) to the Local Plan,~~ which all proposals will be **required to comply with** ~~assessed against~~, as appropriate.

EC 20 Markets

- A. Development proposals ~~should~~ **must** protect and seek to enhance existing markets. New markets or market spaces will be ~~encouraged~~ **supported** where they complement ~~and support~~ Lewisham's town centre network and hierarchy, ~~along with the~~ **and contribute positively to the** cultural vibrancy of the Borough.
- B. ~~Development p~~Proposals for new markets or market space should be directed to appropriate town centre locations. Where ~~new such provision is~~ **market space is** proposed ~~on sites~~ outside of centres, and where the Local Plan has not made provision for main town centre uses there (for example, through site allocation policies), ~~proposals~~ **development** 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 through the sequential approach, and that they:~~
- ~~Do~~ **Will** 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 **well-connected** areas ~~of with~~ good **Public T**ransport **A**ccess **L**evels ~~visibility and can be accessed safely by visitors;~~
 - Can be appropriately accommodated on streets, where appropriate; and
 - Are temporary in nature.
- C. ~~Development p~~Proposals ~~that are likely to for new development~~ affecting existing markets within town centres will be considered having regard to:
- 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
 - The impact on town centre vitality and viability with particular consideration given to:
 - Provision of a range of premises and floorspace to support small and start-up businesses;
 - Local character, including distinctive character of the market; and
 - Public realm and townscape.
- D. ~~All~~ **Development** proposals for markets and market space must demonstrate that there will not be an unreasonable adverse impact on ~~the local amenity of adjoining and neighbouring properties, or and not~~ have a detrimental ~~effect~~ **impact** on **public health and safety and** the ~~functioning of the local road network~~ **public realm**.

Commented [NE297]: Amended to make more concise – the sequential approach is set out in Policy EC12 Town centre network and hierarchy

Explanation

~~8.111-8.113.~~ 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.

~~8.112-8.114.~~ 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. Markets should not be located in poorly connected areas.~~ 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.

~~8.113-8.115.~~ Where new development concerns or may impact on existing markets, proposals must demonstrate ~~consideration to the~~how they will 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.

~~8.114-8.116.~~ All Development proposals must make adequate arrangements to avoid or mitigate unreasonable impacts on ~~the local 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-serviced visitor accommodation will be supported where they are must be appropriately located at sites within or at the edge of town centres, or other sites that are well-connected locations where there are good levels of by public transport accessibility.
- B. Development proposals for new-serviced visitor accommodation should ensure a range of high quality provision in the Borough catered to the varying needs of visitors. Proposals will only be supported where they:
- ~~a.~~ Do not result in the net loss of existing housing;
 - ~~b.~~ a. Are proportionate to their location in terms of size, scale and function;
 - ~~c.~~ b. Do not result in a harmful overconcentration of similar uses serviced visitor accommodation in the locality area;
 - ~~d.~~ c. Comply with the relevant Provide a level of car parking that is appropriate to the site's public transport accessibility level, whilst seeking to minimise car London Plan parking standards wherever possible;
 - ~~e.~~ d. Ensure adequate access, drop-off/-pick-up and servicing arrangements appropriate to the size and location of the accommodation;
 - ~~f.~~ e. Maximise linkages and opportunities for walking, cycling and use of public transport;
 - ~~g.~~ f. Demonstrate high quality and accessible design standards, Are of a high quality design, ensure with an adequate standard of adequate space and amenity for occupants and provide provision of sufficient choice for people who require an accessible bedroom accommodation, in line with draft London Plan requirements;
 - ~~h.~~ g. Make appropriate arrangements for long-term adaptability and sustainability; and
 - ~~i.~~ h. Demonstrate that an agreement is in place to secure an operator prior to the commencement of the development.
- C. ~~Development p~~Proposals for serviced visitor accommodation must should contribute to local area vitality by providing be designed with positive frontages, including active ground floor frontages, and incorporating Where the development incorporates ancillary uses and facilities that are accessible these should be made available for public use, where appropriate, and access not unreasonably restricted.
- ~~C-D.~~ Development proposals for visitor accommodation must not result in the net loss of housing, including through the conversion or change of use of dwelling units.
- E. ~~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).~~ The use of a residential property for 'temporary sleeping accommodation' (short-term let or holiday let) must not exceed 90 nights within a calendar year.

Commented [NE298]: This policy has been amended throughout to better distinguish between serviced visitor accommodation and temporary sleeping accommodation (i.e. holiday lets, Air BnB, etc.), which are considered differently in policy terms

Commented [NE299]: This point has been retained but moved to criterion D below – criterion B deals with design and management rather than land use

Commented [NE300]: Amended to make more concise – policy principles retained

Commented [NE301]: Moved from B above

Commented [NE302]: Amended to better reflect the relevant legislation

~~D.F.~~ Development proposals for the conversion or change of use of serviced visitor accommodation to housing must demonstrate that the relevant Local Plan policies for housing will be satisfied including on design quality, space standards and provision of affordable housing.

Commented [NE303]: Additional point to reinforce requirements around high quality housing

Explanation

~~8.115-8.117.~~ 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's Central Activities Zone, 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.

~~8.116-8.118.~~ For the purpose of this policy, serviced 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.

~~8.117-8.119.~~ 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 Serviced visitor accommodation is defined by the NPPF as a main town centre use. It should therefore be located where there is good public transport accessibility. This includes within town and/or at the edge of town centres.⁷¹ These locations, which are well-suited to supporting visitors with a range of complementary facilities and services, and generally benefit from good public transport links. Development proposals for visitor accommodation outside of town centres will need to be sufficiently justified, having regard to the sequential approach for main town centre uses, for example, with evidence demonstrating a lack of availability of suitable sites.

Commented [NE304]: Amended for consistency with the NPPF and the London Plan

~~8.118-8.120.~~ Development proposals for visitor accommodation, like all new development, must positively contribute positively to the local area, including its character and setting of its site. The nature and scale of the accommodation development 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.

~~8.119-8.121.~~ All visitor accommodation should be designed to a high quality standard. Proposals will be expected to respond positively to the local context,

⁷¹ This is in line with the Sequential Approach to the location of main town centres uses established by the NPPF and London Plan (2021) Policy SD7 Town centres: development principles and Development Plan Documents.

~~taking into account the distinctive features of the built, historic and natural environments. Particular attention should be given to the quality of materials. Development proposals must ensure adequately sized amenity spaces and bedrooms, including sufficient provision for accessible bedrooms with reference to London Plan Policy E10 (Visitor Infrastructure). We will expect that a New development is should be capable to of achieving accreditation by the National Quality Assurance Scheme.~~

Commented [NE305]: Amended for consistency with the London Plan

~~8.122. Development proposals will be expected to must be designed with positive frontages. They should also maximise opportunities to deliver integrate active ground floor frontages and appropriate ancillary uses, particularly in to support town centre locations vitality and viability. 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 uses. that can be Access to facilities should not be unreasonably restricted and made available for use by the local community wider public as well as visitors using the accommodation.~~

~~8.120-8.123. Development pProposals will also need to must demonstrate that the visitor accommodation is both sustainable and deliverable feasible. Through the Green Tourism for London programme, hotels and other serviced accommodation 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 Applications must 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 that support the delivery of the spatial strategy.~~

Commented [NE306]: Amended to make more concise – the matter of speculative development continues to be addressed in retained text

~~8.124-1.1. 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.~~

Commented [NE307]: This has been moved up in the supporting text to paragraph 1.22

~~8.122-8.124. Lewisham has significant housing needs and development proposals involving the net loss of housing will therefore be refused. 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 serviced accommodation. It is important that conventional the Borough's housing supply is not compromised by unlawful use of residential premises for visitor accommodation. Therefore, The Deregulation Act 2015 includes provisions on the use of residential properties for temporary~~

~~sleeping accommodation (i.e. serviced lets or holiday lets). 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. Operating an entire residential property for short-term rental for more than 90 nights in London without planning permission is an unauthorised change of use.~~

Commented [NE308]: Amended to refer relevant legislation on temporary sleeping accommodation and to make clear Council's position on loss of housing through unauthorised uses

~~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.a. Falls within the boundary of a site allocation that is not expected to come forward for comprehensive redevelopment in the short term; or~~
 - ~~c.a. is located on land within a consented major development scheme, which is being delivered in phases; and~~
 - ~~d.a. The meanwhile use sought:~~
 - ~~i. is appropriate to its location, with priority given to suitable employment generating, community or cultural uses;~~
 - ~~ii.i. Will not adversely impact on the amenity of adjoining and neighbouring occupiers, in line with the Agent of Change principle (Policy QD 9);~~
 - ~~iii.i. 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.i. Will be temporary in nature.~~
- ~~B.A. 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~~

~~8.123.1.1. 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.~~

~~8.124.1.1. 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.

8.126.1.1. 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.

8.126.1.1. 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.

8.127.1.1. 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.

8.128.1.1. 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.

Commented [NE309]: This policy has been moved to Part 4 of the Local Plan which deals with Delivery and monitoring.

9 Community infrastructure

What you've told us

Community facilities are important to health and wellbeing and should be protected.

Highly valued facilities include:

- Libraries
- Youth centres
- Leisure and recreation centres and clubs

Community facilities should be open to everyone. Where they are not free to use, they should be affordable to local residents.

Some concerns about:

- The poor condition and possible closure of older community facilities
- Whether there will be enough community facilities (such as surgeries and schools) to meet extra demand as the borough grows

What we've learned

Early education and school places

- There is good provision of childcare and early education places
- Expected demand for primary and secondary school places can be met with existing facilities now, but a new secondary school is likely needed in the long term
- About 30% of secondary school students living in Lewisham attend schools elsewhere in London.

Sport and recreation

- More sport and recreation facilities, including playing pitches, will be needed over the long term.
- Some areas are not as well served as others for children's play space and equipment.

New ways of delivering services

- Service providers are seeking new ways to maintain and improve services, such as by modernising their buildings and facilities.

Main issues

Meeting the needs of our growing population

Lewisham's population growth will create extra demands for community facilities and services (including education, health and social care) which needs to be managed.

Many providers of facilities and services

A range of public and private sector bodies provide community facilities and services – a joined-up approach is needed to ensure local needs are effectively met.

Funding

Some community facilities and buildings require funding to cover regular maintenance and repairs.

Using facilities more effectively

We may need to think differently about how facilities are used, and the best ways of providing for the needs of communities within the resources available. This may include re-purposing facilities, for example, converting full-sized playing pitches to smaller ones could better meet the needs of children and young people.

We're proposing to...

~~Ensure neighbourhoods are well supported with facilities and services~~

- ~~• Prepare an Infrastructure Delivery Plan (IDP) to identify and monitor needs~~
- ~~• Work with our partners to deliver community facilities and services, and ensure these are provided in the right places.~~

~~Make the best use of facilities and secure new ones~~

- ~~• Ensure Lewisham's needs for education, health and social care facilities and services are met~~
- ~~• Require larger housing developments to provide, or help to fund, new community facilities in areas where many more people will be living.~~

~~Provide high quality facilities accessible to all~~

- ~~• Ensure facilities are built and maintained to a high quality standard~~
- ~~• Encourage the shared use of facilities so more people benefit from them~~
- ~~• Improve access to recreational opportunities~~

~~Improve the quality of play space and access to it, especially where space is lacking~~

~~<Did you know?>~~

~~The New Generation (TNG) Youth and Community Centre in Sydenham has won awards for its innovative and high quality design, which was created with input from young people. This includes recognition from the Royal Institute of British Architects (RIBA).~~

Commented [NE310]: Not required for Regulation 19 plan

CI 1 Safeguarding and securing community infrastructure

- 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.
- 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~~ will be required ~~to contribute to the delivery of~~ community infrastructure on-site or by expanding capacity of existing facilities, where feasible, particularly in those areas where there are acute deficiencies in facilities or services, as identified in the Infrastructure Delivery Plan.
- All development proposals should make the best of optimal 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.
- ~~New~~ dDevelopment proposals will be supported where ~~it~~ they safeguards and enhances community infrastructure. Where development ~~would~~ will result in the loss

of an existing community facility, or land and buildings formerly in community use, [development](#) 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 [neighbourhoods and](#) 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 [neighbourhoods and](#) 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 CI1.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 (including the alteration, extension or reconfiguration of existing facilities)~~ ~~community infrastructure~~, will be supported where the facility:
- ~~a. The site and building is~~ appropriately located for the intended use; ~~and~~
 - ~~a-b. is~~ easily accessible by public transport, walking and cycling;
 - ~~b-c. The development has been is~~ designed to maximise the flexibility and adaptability of space to accommodate a range of community uses ~~and users, wherever practical and feasible;~~

~~e.d.~~ The development includes provision of well-integrated facilities that ~~enable it to effectively support the effective functioning and viability as of the~~ community use, such as meeting spaces, broadband connection, kitchen facilities, toilets and dedicated storage space;

~~d.e.~~ 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; and

~~e.a.~~ There are clear arrangements to ensure the facility will be appropriately managed and maintained to an acceptable standard; and

~~f.~~ Will not result in a significant adverse impact on the amenity of neighbouring uses and the surrounding area properties (including amenity, traffic, parking and safety impacts) consistent with other Local Plan policies.

Commented [NE311]: Moved to B below

Commented [NE312]: Repetition – this is covered elsewhere in the plan

B. Development proposals for new community infrastructure ~~There are~~ must ensure that clear arrangements to ensure the facility will be appropriately managed and maintained to an acceptable standard over its lifetime.; and

Explanation

Commented [NE313]: Policy supporting text amended throughout to make more concise

9.8. Community infrastructure is vital to ~~supporting liveable neighbourhoods and securing inclusive communities, and to meeting the needs of different groups within the Borough.~~ We will ~~therefore~~ be broadly supportive of development proposals involving new or enhanced provision of community infrastructure, particularly where this helps to meet local needs. The Infrastructure Delivery Plan should be referred for further information on the types of facilities required in different parts of the Borough.

~~9.8.9.9.~~ Community fFacilities ~~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. These locations generally benefit from higher Public Transport Access Levels. Community facilities can also support the vitality and viability of town centres by encouraging visitors and linked trips. However other locations ~~will be considered on an individual basis may be appropriate,~~ recognising that some community uses may not be ideally located in centres owing to space constraints, site availability or other requirements ~~specific to the community service or associated with the~~ facility. All proposals ~~will be expected to~~ must demonstrate that the ~~proposed~~ site location is appropriate ~~to the community and group(s) it is intended to serve. This includes having regard to local need for the use,~~ accessibility consideration for the development's functional relationship and compatibility with adjoining and neighbouring land uses.

~~9.9.9.10.~~ All development proposals for community infrastructure, ~~whether new build or changes to existing facilities, will be expected to~~ must investigate opportunities ~~and, wherever feasible,~~ incorporate design features that allow for flexibility and adaptability of use the facility over ~~the its~~ lifetime ~~of the development.~~ These design features should be implemented wherever practical and feasible. It is important that consideration ~~Consideration is~~ should be given to the use of space in designs that can accommodate ing a wide range of community 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

~~the~~ co-location or shared use of facilities. ~~In addition to enhancing the overall functional integrity of the facility, such interventions~~ This can help to support the viability of community infrastructure through frequent usage (ensuring the facility is not underused during non-peak hours) and by making it more adaptable to the changing needs of the community over the long term.

~~9.10-9.11.~~ Community facilities must be designed to a high quality standard using the design-led approach. They should be accessible and inclusive places that help to promote social cohesion. Development proposals ~~will be expected to~~ must 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, broadband connection, communal areas and meeting spaces, and generous dedicated storage space. ~~We will resist~~ Proposals that will be refused where they do not suitably demonstrate that the development is designed to support the long-term viability of the community use, whether as a standalone building or part of a mixed use development. ~~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 approach.~~

~~9.11-9.12.~~ 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.~~ Development proposals for community infrastructure must make adequate arrangements for the maintenance and management of the facility over its lifetime. A Site Maintenance and/or Management Plan should be submitted prior to the occupation of development. Where facilities are integrated into ~~new development, for example in major residential development schemes~~ new mixed-use developments, these should be made as accessible as reasonably practical. We will ~~resist~~ refuse proposals for facilities where these unreasonably restrict public 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.~~

Figure 9.1: Play space mapping and deficiency areas

CI 3 Play and informal recreation

~~A.~~ Development proposals should help to ensure that All people, and particularly children and young people, should of all ages and abilities have access to a wide range of opportunities for play and informal recreation. New development will be supported where it provides new or improved with facilities, along with public realm enhancements, so that play and informal recreation space can be reached safely and easily throughout the Borough.

~~A.B.~~ Development proposals that are likely to be occupied or used by children and young people should seek to must increase opportunities for play and informal recreation, ~~particularly~~ Where located in areas ~~where there are~~ with identified deficiencies in ~~provision~~ play space, new development must provide demonstrable improvements in the quantity and quality of play space.

Commented [NE314]: Respond to public consultation – need more recognition that play should focus on all ages not only on children and young people

Commented [NE315]: Amended to strengthen policy

~~B-C.~~ New housing development ~~will be expected to~~**must** incorporate well-designed and high quality formal play provision of at least 10 square metres per child. Provision should be ~~provided delivered~~ on-site and made accessible to all children in the development ~~irrespective of~~**without being segregated by** housing tenure. Off-site provision will only be acceptable in exceptional circumstances, where it can be suitably demonstrated that ~~delivery of play on-site~~ provision ~~on-site~~ is not feasible and ~~residents~~ **there is play space in proximity to the development that can be accessed safely and easily by all of its residents of the development will not be adversely impacted**. Off-site provision ~~will be required to~~**must** be provided in line with the Council's Planning Obligations SPD.

Commented [NE316]: Respond to consultation and Member feedback – to make clear the requirement tenure neutral design

Commented [NE317]: Amended for clarity and to aid policy implementation

~~C-D.~~ All ~~new~~ play space and provision for informal recreation ~~should~~**must** be sensitively integrated into the site and ~~locality~~**neighbourhood**, and be designed ~~and managed~~ to:

Commented [NE318]: Moved to F below as D deals with design rather than management matters

a. ~~Ensure the provision is free to use, with unrestricted~~**that public access is encouraged and not unreasonably restricted, and made free-to-use wherever secured as part of new housing development;**

Commented [NE319]: Amended for soundness - it is recognised that play and recreation space may be integrated into community uses (such as leisure centres or soft-play centres) where a fee may be required. The policy is clear that play space secured as part of new housing development must be free to use

b. Provide a stimulating and pleasant environment that promotes ~~inter-generational integration~~**social cohesion, and including by enabling** users of different ages and abilities to interact as well as to move around and play independently;

~~b-c.~~ **Provide opportunities for respite, such as benches or seating areas;**

~~c-d.~~ **Help ensure the safety of children and young people, including through layout and design features that allow for** ~~Enable~~ informal ~~community~~ supervision **through passive surveillance;**

~~d-e.~~ Integrate natural features such as trees, landscaped play areas and other greening measures; ~~and~~

f. Maximise the use of permeable surfaces **and Sustainable Drainage Systems; and**

~~e-g.~~ **Site outdoor communal amenity and play spaces at the street level or ground floor of development, avoiding the use of rooftops and mezzanines.**

Commented [NE320]: Amended to align with Council's Parks and Open Spaces Strategy

~~E.~~ 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~~.

~~D-F.~~ **Development proposals including new or enhanced play space must ensure the provision will be appropriately managed and maintained over its lifetime.**

Commented [NE321]: Moved from D above

~~E-G.~~ Development proposals that ~~will~~ result in the ~~net~~ loss of ~~existing~~ play space, ~~whether existing or consented but not built~~, will be ~~strongly resisted~~**refused** unless:

a. Replacement provision of at least an equivalent ~~size amount~~ and improved quality will be provided, either on ~~the~~ site or in ~~its vicinity~~**proximity to it, to meet the needs of children and young people in the locality;** or

- b. It can be suitably demonstrated that the loss would not result in a shortfall of provision in the locality area, having regard to existing and projected future need.

Explanation

~~9.12-9.13. 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 [This is a key issue in Lewisham as 21 per cent of school children in Reception are obese, rising to 37 per cent in Year 6. Further, some 58 per cent of adults are obese.]⁷² Play is also important to mental health and wellbeing as it provides opportunities for learning and social interaction at the early stages of and throughout life.~~

Commented [NE322]: Policy supporting text amended throughout for clarity and to aid policy implementation

~~9.13-9.14. The Lewisham Open Spaces Assessment (2019) undertook includes an audit of formal play provision in the Borough, by looking at the various types of existing provision suited to for 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.⁷³ To address local deficiencies and improve access to provision throughout the Borough, All-new development should therefore investigate and seek to increase opportunities for play for all age groups, taking into account the types of provision needed for them, 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.~~

Commented [NE323]: Factual updates to help justify the policy approaches

~~9.14-9.15. In line with the London Plan, nNew residential development housing schemes will be required to must 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 pPlay spacer provision will should be delivered on-site. Off-site provision will oOnly be considered 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, including a design options appraisal, and that the needs of existing residents will continue to be met generated by the development will be adequately met. Normally, off-site provision will be more appropriate for older children and young people as they are able to travel slightly longer distances by foot or bicycle. 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 play space standard and off-site provision the application of this policy and the~~

Commented [NE324]: Respond to consultation – more emphasis on play provision for all age groups

Commented [NE325]: Repetition – this is clearly set out in the policy

⁷² Lewisham Joint Strategic Needs Assessment: Picture of Lewisham, Part B, 2019.

⁷³ 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 include space made by private providers and developments. The assessment provides a baseline position for applications to consider appropriate provision of play space in the locality.

~~benchmark requirement~~ are set out in the Council's Planning Obligations SPD and relevant London Plan ~~supplementary planning~~ guidance, ~~currently the Play and Informal Recreation SPG.~~

~~9.15-9.16.~~ 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 delivered through~~ the design-led approach with careful consideration given to the ~~specific play~~ requirements of the intended users. ~~Play space and other outdoor communal amenity space should be integrated at the street or ground floor level. The siting of provision on rooftops and mezzanine levels should be avoided as this may impede safe access and lead to provision being sited where microclimate conditions are not suitable. Rooftop and mezzanine space will only be acceptable where there is a clear design rationale and the provision is of an exceptional quality.~~ ~~Applicants are strongly encouraged to~~ Developments should maximise opportunities 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, enhance access to nature, and ~~-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.~~

~~9.16-9.17.~~ To support inclusive neighbourhoods and communities we will seek to ensure that all play space is free to use and made accessible to the wider public. ~~We will strongly resist Development~~ proposals that unreasonably restrict access to play space, for example, by fencing or other ~~interventions measures designed to provide for exclusive access to residents of particular developments will be refused. Play space to which access is segregated by housing tenure is wholly unacceptable.~~ It is recognised that ~~some controls play provision may need be required in the interests of local amenity, for example, to be limited to ensure the use of facilities is limited to regular daytime or early evening operating hours to protect the amenity of residents.~~ Site Management and/or Maintenance Plans should be submitted to address any such matters, along with arrangements for upkeep of space and equipment over the lifetime of the development.

~~9.17-9.18.~~ 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 environment public realm~~ should encourage everyone, ~~and particularly children and young people,~~ to move around freely and independently in active ways, having regard to the Healthy Streets Approach. ~~Therefore all Development proposals should give consideration to assess how the design and configuration of spaces and buildings, and how these might function to impede or enhance safe access to play opportunities.~~

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:~~

Commented [NE326]: Included to support new policy criterion D.g above, in line with new Parks and Open Spaces Strategy

- a. ~~Be located where they can be safely and easily accessed~~ Accessibility by walking, cycling and public transport;
- b. ~~Not have an unacceptable adverse impact on traffic movements the road network and ensure adequate arrangements for~~ car parking including access, egress, cross-site movement and drop-off areas, with consideration given to needs of disabled users;
- c. ~~Protect, manage and not adversely impact on local~~ Protection of amenity of adjoining and neighbouring uses;
- d. ~~Respond positively to~~ Local character; and
- e. ~~Secure~~ Provision of fit-for-purpose facilities to accommodate the intended use and all likely users, including suitable outside play space where appropriate.

Commented [NE327]: Amended for clarity and to aid policy implementation

- B. The use of residential floorspace for day nurseries and childcare facilities will only be supported where it is demonstrated that:
- a. The development ~~does will~~ 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;
 - b. The community use is ancillary to the residential use;
 - c. There is a ~~specific local area need~~ demonstrable local need or market demand for the ~~community~~ use proposed; and
 - d. There are no suitable and available non-residential premises to accommodate the use.

Explanation

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 development proposals for nursery and childcare provision should therefore engage with refer the latest most recently published Council 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.

Commented [NE328]: This has been moved from elsewhere in the supporting text.

9.18-9.20. ~~As with all types of community infrastructure, New~~ nurseries and childcare facilities should be appropriately located ~~within the Borough. Priority should be given to at safe, well-connected and easily accessible sites/locations, and where the impacts of additional movements arising from the use can be appropriately managed and mitigated. We will expect that Applicants fully should~~ investigate opportunities to locate such uses in ~~existing D Use-Class E premises units, 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 (~~Class 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~~ **Class E community use**.

~~9.19.1.1. 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.~~

Commented [NE329]: Moved to first paragraph.

~~9.20.9.21. 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** will meet the needs of specific uses and **likely range of all intended** users. **All Development proposals will be expected to be accompanied by a statement must demonstrate how the policy requirements will be satisfied. A statement should be submitted 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.**~~

Commented [NE330]: Repetition – this is set out in the policy above

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:
 - a. Adequately meets the requirements of the various groups within the Borough, including those groups for whom burial is the only option;
 - b. Is appropriately located and within close proximity to the community it is intended to serve; and
 - c. Identifies and appropriately responds to potential flood risk issues, including through the incorporation of mitigation measures.

Explanation

~~9.21.9.22. 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.~~

~~9.22.9.23. 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.

~~9.23-9.24.~~ 9.24. 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.

~~9.24-9.25.~~ 9.25. 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.

Commented [NE331]: As part of ongoing work on Infrastructure Delivery Plan, officers are engaging with relevant Council service area to confirm the latest position on need. Updates will be included in the plan where appropriate.

10 Green infrastructure

What you've told us

Green and open spaces are vital to:

- Leisure, health and well being
- Nature and wildlife
- Tackling climate change
- Making town centres other places attractive

Green and open spaces should be protected from:

- New developments
- Being paved over, especially gardens

More should be done to make the borough greener by:

- Tree planting
- Providing more and better quality pocket parks in built up areas
- Creating new green spaces in large developments

What we've learned

Lewisham is very green

- Green spaces cover one fifth of the Borough.
- Lewisham was named one of the top boroughs in a recent Good Parks for London report.
- 15 parks have the Green Flag award for outstanding quality.

Some areas are better served than others

- People lack good access to parks, open space and nature in some areas
- Our Open Space study shows how some spaces are of fair or poorer quality
- Population growth will put extra pressure on parks and open spaces – more are needed to maintain current public access standards.

Opportunities to improve nature sites

- The Lewisham Biodiversity Action Plan and other key strategies highlight opportunities to improve the natural environment.

Main issues

National park city

The draft London Plan aspires for London to be a National Park City, and at least 50 per cent green by 2050 – Lewisham will have to play its part.

Access to open space

More and/or better provision will be needed in some areas to ensure everyone benefits from easy access to good quality parks and open spaces.

Meeting the needs of our growing population

Creating new large open spaces will be challenging as land is needed for homes and jobs

Biodiversity and nature

The council is now required to ensure the Local Plan delivers net gains in biodiversity.

We're proposing to...

Protect and enhance green spaces and nature sites

- Protect spaces and enhance their quality, for example, with new visitor facilities.
- Enhance the quality of waterways, such as the Rivers Thames, Ravensbourne and Quaggy
- Review open spaces and nature sites, and where appropriate, update their boundaries and level of protection for nature conservation.

Improve public access to spaces

- Prioritise the creation of new open space in areas that are lacking
- Enhance routes and entrances to parks and open spaces
- Improve walking and cycle routes, such as the Green Chain, Thames Path and Waterlink Way.
- Require larger developments to provide new public open space and/or fund improvements to spaces nearby

Promote urban greening

- Set greening standards for larger developments
- Promote the use of green roofs and walls

We've also considered

If we should allow some open spaces to be re-shaped to improve their quality (with no overall loss of space) or not provide such flexibility.

Making changes to the boundaries of spaces, or to their status as open spaces / sites of importance for nature conservation, drawing on our studies.

<Did you know?>

Lewisham was named in the top 3 of all London boroughs in the latest 'Good Parks for London Report'. This is based on parks services in categories such as public satisfaction, quality, supporting nature and community involvement.

Commented [NE332]: Note required for Regulation 19 plan

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) are a fundamental component of the natural environment. This network makes an important contribution to the Borough's local distinctiveness, including its character and heritage. It is also integral to supporting sustainable neighbourhoods and communities by and healthy lifestyles, providing a wide range of multifunctional environmental, social and

Commented [NE333]: Removed - green infrastructure is fully defined in supporting text and includes these elements

economic benefits. ~~Development proposals must protect Green infrastructure should be protected and opportunities taken to and seek to~~ enhance provision of green infrastructure across the Borough, including by ~~enhancing-improving~~ or creating new links between ~~green infrastructure its different elements~~.

- B. Development proposals ~~will be expected to~~ **must demonstrate how they have** investigated and maximised opportunities ~~for to enhancing enhance~~ existing green infrastructure and creating ~~new~~ provision on site through the design-led approach. ~~They must give c~~Consideration ~~should be given~~ to the site's setting within the wider landscape and ~~make suitable arrangement for~~ 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 ~~the multifunctional benefits of green infrastructure are recognised and proactively addressed. Green infrastructure must is-not be~~ considered in isolation of other ~~features-aspects~~ 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.⁷⁴ Research indicates that Lewisham currently enjoys benefits accruing from green infrastructure to a value of up to £2.1 billion, a figure that is 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, t~~he 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

⁷⁴ 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.

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.

Figure 10.1 Grid Green Framework

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 from inappropriate development.
- 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 or planned new 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;

Commented [NE334]: Respond to consultation - This policy (and associated Appendices in Part 5) will be subject to further review and likely revisions, which are pending outcomes of the Open Spaces Study and MOL Review updates. These new studies have been commissioned following a significant amount of public interest on this policy area during the Regulation 18 consultation. Further information in the SDSC cover report.

- c. Do not have a detrimental impact on the environmental function of the open space, including support for nature conservation;
 - d. Respond positively 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 respond positively 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.

Figure 10.2: Open spaces

- 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 approach proposals should seek to create new routes or improve connections to existing or planned new open 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).⁷⁵ 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 positively engage with the ALGG guidance in supporting a linked network of green infrastructure locally that improves public access to open spaces.

⁷⁵ Green Infrastructure and Open Environments: The All London Green Grid. Supplementary Planning Guidance. 2012. Mayor of London.

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.

Figure 10.3: Metropolitan Open Land

Figure 10.4: Open space deficiency – local parks

Figure 10.5: Open space deficiency – district parks

Figure 10.6: Open space deficiency – metropolitan parks

GR 3 Biodiversity and access to nature

- A. The Council will seek to deliver net gains in biodiversity. 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, particularly by walking and cycling.
- 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 approach 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.

Commented [NE335]: Respond to consultation - This policy (and associated Appendices in Part 5) will be subject to further review and likely revisions, which are pending outcomes of the Open Spaces Study and MOL Review updates. These new studies have been commissioned following a significant amount of public interest on this policy area during the Regulation 18 consultation. Further information in the SDSC cover report.

- 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 respond positively 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.⁷⁶ 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.

⁷⁶ 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 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.

Figure 10.7 Designated nature conservation sites

Figure 10.8 Areas deficient in access to nature

GR 4 Lewisham Links

A. Development proposals must contribute to facilitating the creation and enhancement of the Lewisham Links, a connected network of high quality walking routes and cycleways, public open spaces and nature sites across the Borough.

B. On sites located adjacent to an existing or proposed route of the 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 must deliver public realm improvements to support the delivery of the Lewisham Links, the specific nature of which will be considered on a site-by-site basis, and may include:

- 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 Lewisham Links, development proposals must have regard to the Council's Parks and Open Spaces Strategy.

10.18. Supporting text to be included.

GR 45 Urban greening and trees

A. Development proposals ~~should~~ must demonstrate how the design-led approach has been used to incorporate high quality landscaping and optimise maximise opportunities for urban greening measures, including by incorporating high quality

Commented [NE336]: This is a repeat of the policy included in each of the Part 3 sub-area sections. To make the plan more concise, it will be deleted from the sub-area sections and included as this borough-wide policy. A cross-reference to the Lewisham Links will be retained in the Part 3 section, with further details set out on the specific 'links' within each of the respective sub-areas.

and species diverse landscaping, wildlife habitat, green roofs and walls, and sustainable drainage systems. ~~Urban. They must be designed with greening should be fully integrated into the design-led approach 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 ~~proposals~~ must respond positively to landforms including by retaining or enhancing landscape features of historic, ecological and visual amenity value.
- C. Major development proposals ~~will be expected to~~ must 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-green roofs and walls. Major development proposals will be expected to demonstrate that the feasibility of integrating these ~~features-measures~~ has been fully investigated, and minor development proposals are strongly encouraged to incorporate them. Living-Green roofs and walls will be supported where they are appropriately designed, installed and maintained. ~~Development p~~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 to the urban forest, and maximise opportunities for additional tree planting and green infrastructure, particularly trees in characteristically urban settings such as streets. ~~All Development~~ proposals must suitably demonstrate that tree retention along with tree and other green infrastructure planting have been considered as part of the design-led approach 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 positively 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. ~~Development proposals involving should avoid, and the Council will strongly resist,~~ 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

~~40.18.10.19.~~ 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.

~~40.19.10.20.~~ 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 set~~ 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.

~~40.20.10.21.~~ ~~Living Green~~ 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. ~~Development p~~Proposals must demonstrate how the installation and maintenance will comply with the latest industry standards, currently in the Green Roof Code of Best Practice for the UK 2014, or any national equivalent.

Trees

~~10.21-10.22.~~ 10.22. 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.

~~10.22-10.23.~~ 10.23. Trees should be considered at the early stages of the ~~planning and design-led process approach~~ in order to maximise their many beneficial effects including on ecology, local character and amenity. Where development 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.

~~10.23-10.24.~~ 10.24. 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 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.

~~10.24-10.25.~~ 10.25. 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.

~~40.25~~10.26. 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

~~40.26~~10.27. 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 approach. 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 respond positively to those features. Applicants are encouraged to refer Lewisham's Characterisation Study as a useful starting point for understanding landscape features in the Borough.

~~40.27~~10.28. 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.

~~40.28~~10.29. 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 56 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

~~40.29~~10.30. 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.

~~40.30~~10.31. 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 approach 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 67 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;
 - ~~a-b~~ b. Designating a Locally Important Geological Site at Old Gravel Pit, Blackheath; and
 - ~~b-c~~ c. Ensuring development proposals make a positive contribution to the protection and enhancement of geodiversity.

Explanation

Commented [NE337]: Respond to public consultation – request to consider locally important geological sites; one additional site designated as informed by latest London Plan evidence / supplementary planning guidance

~~40.31;10.32.~~ 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.

~~40.32;10.33.~~ Informed by research prepared by the Natural England and the London Geodiversity Partnership⁷⁷, the London Plan identifies scope for the designation of a Regionally Important Geological Site (RIG) at Beckenham Place Park, which is designated in 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. A Locally Important Geological Site (LIG) is also designated at the Old Gravel Pit, Blackheath. This LIG is located at the edge of an open space and features sand and gravel, also from the Harwich Foundation, which are visible despite being overgrown by grass. We will protect the geodiversity interests at ~~this-these sites~~ and promote appreciation and understanding of them, such as by supporting way finding signs, interpretative boards and public access improvements where appropriate.

11 Sustainable design and infrastructure

What you've told us

~~The council should be lead example in responding to the climate emergency.~~

~~More should be done to tackle climate change by:~~

- ~~• Making buildings more environmentally friendly, for example, by using less energy.~~
- ~~• Creating decentralised energy networks, such as in Deptford and Bell Green~~
- ~~• Protecting green and open spaces, and promoting urban greening~~
- ~~• Encouraging people to use cars less~~

~~There are also concerns about:~~

- ~~• Poor air quality~~
- ~~• Fly tipping~~
- ~~• Flood risk, especially in residential areas~~

What we've learned

~~Carbon emissions falling but remain a concern~~

- ~~• The latest Government data shows emissions decreased by 38% from 2005 to 2017.~~

⁷⁷ London's Foundations: Protecting the Geodiversity of the Capital Supplementary Planning Guidance (2012). Greater London Authority.

- Housing is the largest source of carbon emissions in Lewisham, mainly from domestic gas. Transport is the second largest.

Different types of flood risk

- River related flooding is the main form of flood risk in Lewisham
- Large parts of the Borough lie within a Critical Drainage Area, where there is a greater risk of surface water flooding incidents

Poor air quality in some areas

- Some parts of Lewisham exceed the EU limits for the pollutant Nitrogen Dioxide.
- Levels for the pollutant PM10 (Particulate Matter) are within the EU limits but exceed the World Health Organisation guidelines.

Low levels of recycling

- Recycling rates have been improving but Lewisham is behind the rest of London.

Main issues

Climate emergency

The council declared a climate emergency and aims to be carbon neutral by 2030—but there are technical and financial challenges to achieve this.

Population growth

Lewisham's population is forecast to rise by roughly 20% by 2040. Carbon emissions will increase unless action is taken.

Flood risk

Climate change is expected to increase flood risk – the location and design of development will be important to ensure the safety of people and properties.

Air quality

Supporting growth and development whilst improving air quality remains a key challenge.

Waste management

Lewisham must play its part in helping London to manage waste more responsibly.

We're proposing to...

Help reduce carbon emissions

- Ensure new developments meet the London Plan standards for sustainable design and construction.
- Allow for the limited use of carbon offset payments, where carbon reduction targets cannot be met on site. Funds will be used on local green projects.
- Prepare an Energy Masterplan to support the creation and use of decentralised energy networks.

Reduce flood risk

- Restore and revitalise Lewisham's river corridors
- Update our borough-wide flood risk study and use this to inform planning decisions

- ~~Work with partners to maintain and deliver new infrastructure, including flood defences and the Thames Tideway Tunnel.~~

Improve air quality

- ~~Encourage and enable people to use cars less, or not at all~~
- ~~Require new developments to be 'air quality neutral'~~

Reduce and effectively manage waste

- ~~Promote the 'circular economy' – reduce waste by prioritising the re-use and recycling of materials~~
- ~~Work with other boroughs to manage Lewisham's share of waste, and safeguard existing facilities.~~

We've also considered...

- ~~Requiring developments to meet carbon targets on-site in every case (e.g. not allowing flexibility for offset payments).~~
-

Commented [NE338]: Not required for Regulation 19 document

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~~ all development proposals must:
- Help Lewisham to become a net zero-carbon Borough as part of a net zero-carbon London;
 - ~~Designate, P~~ protect and seek maximise opportunities to enhance ~~a the~~ network of green and open spaces, as well as improve linkages to and between them;
 - ~~Designate Conserve~~ sites of importance for biodiversity, protect habitats and species within the local ecological network, and seek deliver net gains in biodiversity ~~wherever possible including through urban greening;~~
 - 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;
 - ~~Ensure that new development does N~~ot adversely affect impact on the amenity of the local population and habitats, including by mitigating impacts on and improving air quality in the Borough;
 - Help London to achieve net waste net self-sufficiency by promoting the applying the waste hierarchy and circular economy principles in order to increase the re-use and recycling of materials and achieve reductions in waste going for disposal.

Commented [NE339]: Respond to consultation – the Local Plan should reflect the requirement to deliver net gains in biodiversity in line with legislation

Commented [NE340]: Amended to reflect that development should reduce flood risk both within and outside of the borough

Commented [NE341]: Repetition – this is covered in the standalone policy on air quality and the policy on amenity and agent of change, which this criterion links to

Commented [NE342]: Amended to align with changes to Policy SD12 Reducing and sustainably managing waste

- C. A plan, manage and monitor ~~process-approach~~ will be used to support the successful transition to a net zero-carbon Borough. This ~~process-approach~~ 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-studies~~ 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.⁷⁸ 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. 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.⁷⁹ At the same time it is imperative that Lewisham's ~~neighbourhoods and~~ 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. [The Council's Climate Emergency Action Plan \(2020\) sets out a roadmap for taking action on climate change in Lewisham.](#)
- 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 adaption 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 net zero-carbon city by 2050, which we are committed to helping achieve. A plan, manage and monitor ~~process-approach~~ will be used to support the successful transition to a net 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~~ the policy approaches set out in this Local Plan. 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

Commented [NE343]: Factual update and informative

⁷⁸ London Borough of Lewisham. Meeting of Council on 27 February 2019. Motion 2 declared to be unanimously carried.

⁷⁹ 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.

strategies. ~~For example, we have committed to preparing a future Climate Change Action Plan and to investigate options and feasibility of becoming a net 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.~~

Commented [NE344]: Deleted as the Action Plan has now been adopted, and this has informed the Local Plan

SD 2 Sustainable design and retrofitting

- A. Development proposals ~~will be required to~~must submit a Sustainable Design Statement. This should clearly set out how the design-led approach has been used to ensure the integration of sustainable design principles ~~have been integrated into the design-led approach~~, 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:
- Landscape design and urban greening;
 - Nature conservation;
 - Energy use and heat risk management;
 - Air quality;
 - Flood risk and water management;
 - Ground conditions; and
 - Waste reduction and the circular economy.

B. Proposals for new self-contained major and minor residential development ~~will be required to~~must achieve the BRE Home Quality Mark.

C. ~~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.~~

Commented [NE345]: This criterion has be re-ordered within the policy

Sustainable retrofitting

D. ~~The use of sustainable retrofitting measures will be encouraged and supported in order to improve the energy efficiency and environmental performance of housing and other buildings, as well as the quality of living spaces for their occupants. Retrofitting measures should be integrated using the 'whole house' or 'whole building' approach, which requires an understanding of how a building has been constructed, its context and all the factors affecting energy use.~~

Commented [NE346]: Respond to consultation and Member feedback – new policy and standalone subsection on sustainable retrofitting to give this matter more prominence and direction in the plan

B-E. ~~Development p~~Proposals for major residential domestic refurbishment ~~will be required to~~must achieve a certified 'Excellent' rating under the BREEAM Domestic Refurbishment 2014 scheme, or future equivalent.

C.A. ~~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.~~

Commented [NE347]: Moved above.

D.F. 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.

E.G. Where planning consent is required, sustainable retrofitting measures to existing buildings and other development will only be supported where they comply with other Local Plan policies are satisfied, including on the historic environment and heritage assets.

Commented [NE348]: Respond to consultation – request that this point is embedded in policy and not only in supporting text

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~~ must 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.

Commented [NE349]: Repetition – this repeats the point in criterion A above

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. Planning contributions, such as carbon offsetting, may be sought where ~~development proposals~~ where it is suitably demonstrated that the policy requirements cannot be sufficiently satisfied such as for reasons of technical feasibility.

- 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~~ require a certain level of fit out. However, our expectation is that shell only and shell and core proposals, where appropriate, should be capable of meeting the BREEAM credits, taking into account the flexibility provided by the BREEAM methodology.

Sustainable retrofitting

- 11.8. Housing is the single largest contributor of carbon emissions in Lewisham, with more than 50 per cent of emissions coming from energy used within homes.⁸⁰

Sustainable retrofitting measures can help to improve the energy performance of existing buildings and minimise carbon emissions produced 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.

- 11.9. The most appropriate type of sustainable retrofitting measures will vary depending on the type of building, its context and location, including character setting. A 'whole house' or 'whole building' approach is one that looks at the energy performance of a building in a comprehensive and integrated way. It helps to ensure that improvements are carried out in an organised, sensible order, with installations and refit measures complementing rather than working against each other. For instance, some standard retrofitting measures can cause damage to traditional buildings, causing problems with trapped moisture which may reduce energy efficiency and bring risks to the health of occupants. In addition, the budget available to householders and other developers will impact on the type and amount of retrofitting works they are able to carry out. The whole house approach can be useful to inform the most appropriate and cost-effective measures, along with phasing of works delivered over a longer period. Householders and other developers are encouraged to refer good practice guidance when considering retrofitting, such as the Climate Emergency Retrofit Guide published by the London Energy Transformation Initiative (LETI).

- ~~11.8-11.10.~~ It is important ~~that all such proposals~~ retrofitting is carried out in a way that preserves or enhances the significance of heritage assets and their setting (such as Listed Buildings and buildings within Conservation Areas) in line with

Commented [NE350]: Factual update and added to strengthen policy justification

Commented [NE351]: Repetition – support is set out in criterion D above

Commented [NE352]: Respond to consultation - Additional supporting text for retrofit policy

⁸⁰ Lewisham's carbon emissions baseline data. Drawn from the Department of Business Energy and Industrial Strategy (June 2019).

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 To~~ help Lewisham to become a net zero-carbon Borough ~~by development proposals must be designed to reducing-reduce~~ greenhouse gas emissions in ~~the operation stage and minimising-minimise~~ energy demand (annual and peak) in accordance with the ~~draft~~ London Plan energy hierarchy, ~~as follows:~~
- a. ~~Be lean: use less energy and manage demand during operation.~~
 - b. ~~Be clean: exploit local energy resources and supply energy efficiently and cleanly.~~
 - c. ~~Be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site.~~
 - d. ~~Be seen: monitor, verify and report on energy performance.~~
- B. Major development proposals ~~will be required to demonstrate how the must be net~~ zero-carbon ~~target will be met by applying the energy hierarchy, in line with draft~~ London Plan policy S12 (Minimising greenhouse gas emissions) ~~and:~~
- a. ~~Meet the minimum on-site reduction of carbon emissions required by the~~ London Plan;
 - b. ~~Calculate and minimise emissions from any part of the development that are~~ not covered by Building Regulations (e.g. unregulated 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.
- B. 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.⁸¹ ~~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).
- C. ~~In exceptional circumstances, Ww~~ where it is clearly demonstrated that the net zero-carbon target cannot be fully achieved on-site, development proposals ~~will be~~ required to ~~must~~ make contributions to ~~address-meet~~ the identified shortfall through:
- a. A cash-in-lieu contribution to Lewisham's carbon offset fund; ~~and/or~~
 - b. Appropriate off-site measures where these can be demonstrated to be deliverable.
- D. Major development proposals are encouraged to assess embodied carbon emissions and maximise opportunities to reduce these emissions.

Commented [NE353]: Removed to make more concise – the energy hierarchy is set out in the London Plan, which the policy refers

Commented [NE354]: Respond to consultation and align with London Plan approach – further clarification on how zero carbon will be calculated, including consideration of non-regulated emissions

Commented [NE355]: Re-phrased in B above.

Commented [NE356]: Respond to consultation – request for policy on embodied carbon

⁸¹ 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.

D-E. Details of the approach used to meet the net zero-carbon target should be clearly set out in an Energy Strategy submitted as part of the Sustainable Design Statement.

Commented [NE357]: Re-ordered within the policy.

Explanation

11.11. 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 and help Lewisham become a~~ net zero-carbon ~~itself borough~~, 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 this target now also applies~~ to major non-residential developments ~~from 2019~~. To meet the zero-carbon target, ~~the London Plan requires major developments to provide~~ an on-site reduction of at least 35 per cent beyond the baseline of ~~part 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 ~~and updating~~ through the London Plan review process.

11.12. Embodied carbon refers to the greenhouse gas emissions arising from the manufacturing, transportation, installation, maintenance and disposal of building materials. This is distinguished from operational carbon which refers to emissions arising from building energy consumption. Operational carbon is dealt with by the London Plan and Policies SD3.A-C above. To help ensure that the carbon emissions are fully accounted and minimised during the development process, applicants are encouraged to assess and address embodied emissions through the design-led approach. Good practice guidance on this element of low carbon design should be referred, such as that prepared by the London Energy Transformation Initiative (LETI).

Commented [NE358]: Respond to consultation – additional supporting text for new policy on embodied carbon

11.13. ~~We will seek to ensure that all~~ All new development proposals ~~are must be~~ designed ~~having regard to the London Plan energy hierarchy giving priority to on-site carbon reductions. Consideration may be given to o.~~ New development is expected to be net-zero carbon and where this is not feasible, it ~~should get as close as possible to zero-carbon on-site.~~ Off-site contributions ~~should be used as a last resort and will only be acceptable~~ where it ~~can be~~ clearly ~~and suitably~~ demonstrated that carbon targets cannot be fully achieved on-site. These contributions ~~will be required to~~ must address any ~~identified~~ 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.

Commented [NE359]: Respond to consultation – the plan should emphasise that offset should only be used as a last resort

SD 4 Energy infrastructure

A. Development proposals must be designed in response to a site-specific assessment of the most effective and efficient energy supply options, taking into account ~~the Council's Energy Masterplans where appropriate~~. For large-scale schemes, applicants ~~are encouraged to~~ should engage at an early stage with the relevant

Commented [NE360]: Amended to refer the Council's Energy Masterplan, which identifies key opportunities for district heating in the borough

energy suppliers and bodies to establish future energy and infrastructure requirements necessary to support the development.

- B. ~~Proposals for new build and~~ Development proposals, ~~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~~ must provide a ~~Feasibility Assessment~~ for connecting to, and if possible extending or interconnecting, existing or planned future heat networks ~~located~~ on or in proximity to the site. ~~Proposals for minor new-build development, conversions and building alterations proposals should~~ must demonstrate that they have investigated and ~~optimise maximised~~ opportunities to connect to existing heat networks.
- C. ~~Where a decentralised heat network is planned or likely to be delivered in the future, All major and minor development proposals should be designed for to enable a cost-effective future connection to it, 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:~~
- ~~a. Connect to local existing or planned heat networks.~~
 - ~~b. Use zero-emission or local secondary heat sources.~~
 - ~~c. Use low-emission combined heat and power (CHP) where there is a case for CHP to deliver an area-wide heat network.~~
 - ~~Use ultra-low NOx gas boilers.~~
- E. ~~Development proposals for~~ CHP and ultra-low NOx 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 ~~have been fully investigated and are not feasible,~~ 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~~ must include full dispersion modelling to assess impacts on nearby receptors.
- F. Where CHP and ultra-low NOx 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~~ must, 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.

Commented [NE361]: Amended for clarity and to aid effective policy implementation

Commented [NE362]: Removed to make more concise – the heating hierarchy is set out in the London Plan, which the policy refers

- 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.

Figure 11.1: Lewisham heat map – Tier 1 and 2 heat loads

Explanation

~~11.11-11.14.~~ In order ~~to achieve the strategic objective~~ for Lewisham to become a net 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 **more** 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.~~

~~11.12-11.15.~~ 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.~~

~~11.13-11.16.~~ The Council has ~~and will continue to prepare~~ **a suite of** studies ~~investigating the potential for to support~~ decentralised energy network development in the Borough, ~~drawing on the latest available information~~. This includes the Lewisham Energy Masterplan (2020) ~~and Strategic Borough-wide Decarbonisation Study (2020), 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 an Energy Masterplan to provide an updated position on the most feasible options for network development.~~ All **development** proposals ~~will be expected to should~~ refer to the **Council's latest local energy masterplans and studies evidence for guidance in considering energy sources,** and to ensure that opportunities for decentralised energy are maximised.

~~11.14-11.17.~~ All proposals for major residential and commercial development ~~will be expected to must~~ submit a **F**feasibility **A**assessment to fully evaluate 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

Commented [NE363]: Removed to make more concise – this point is captured in the policy

Commented [NE364]: Factual update to refer latest technical evidence

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 ~~proposals for~~ minor new-build development, ~~extensions and alterations proposals~~ should also seek to secure connection to heat networks. ~~Major development p~~Proposals ~~will be expected~~ ~~to~~ ~~must~~ 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.

~~41.15.11.18.~~ In areas where there are no existing or planned district heat networks proposals should be designed for future connection to a heat network. The latest London Heat Manual should be referred for further guidance. Designs should entail a wet heating system, single point of connection into heating system, additional plant room space for thermal substation and low temperature heating systems (60 degrees Celsius or lower) to support low temperature heat networks 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.~~

~~41.16.11.19.~~ ~~Consistent with the draft London Plan, a~~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~~ ~~refuse~~ proposals that rely on CHP or gas boiler systems where their use is not sufficiently justified. Where the use of an ultra-low NOx 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 ~~other Policy SD 6 (Improving Air Quality) and relevant London Plan Local Plan~~ policies.

~~41.17.11.20.~~ Where development proposals including CHP and ultra-low NOx 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~~ ~~enable~~ future connections.

~~41.18.11.21.~~ Heat networks and communal heating systems must be designed, constructed, commissioned and operated in accordance with CIBSE/~~ABE~~ Code of

Commented [NE365]: Deleted as policy now refers to the Council's Energy Masterplan

~~Practice CP1.2: Heat Networks Code of Practice, or the latest version equivalent.~~

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.

~~11.19.11.22.~~ 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~~ **must** minimise ~~internal heat gain and the~~ **adverse** 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~~ **must** be designed to reduce the potential for **internal** overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy, ~~as follows: 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 approach.~~
- ~~a. Minimise internal heat generation through energy efficient design.~~
 - ~~b. Reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation, and the provision of green roofs and walls.~~
 - ~~c. Manage the heat within the building through exposed internal thermal mass and high ceilings;~~
 - ~~d. Provide passive ventilation.~~
 - ~~e. Provide mechanical ventilation.~~
~~Provide active cooling systems.~~
- ~~B.A.~~ ~~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 approach.~~
- C. Major development proposals ~~will be required to~~ **must** submit an Energy Statement to demonstrate how they will meet the requirements of ~~(BA)~~ and ~~(CB)~~ above.

Commented [NE366]: Removed to make more concise – the cooling hierarchy is set out in the London Plan, which the policy refers

Commented [NE367]: This point has been moved to B above.

D. Major development proposals incorporating ~~amenity space and~~ public realm, including amenity and open space, should be designed to create a comfortable environment, ~~including~~ through the provision of shade and other passive cooling measures, giving priority to urban greening 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.~~

~~11.21-11.23. 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. 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 must therefore use the design-led approach to be expected minimise internal heat gain and manage heat risk through the design, layout and orientation of buildings and spaces, along with the use of materials in line with . Proposals should incorporate measures in line with the Mayor's the London Plan 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.~~

~~11.22-11.24. 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.~~

~~11.23-11.25. Severe hot weather events can discourage physical and outdoor activity. Development proposals must will therefore be expected to be designed to promote provide for a comfortable environment, by helping to ensure that This may include opportunities for respite, such as shaded areas, are integrated into the public realm and that and other or measures to ensure indoor amenity spaces are cool and well-ventilated. Where necessary, a Planning contributions forte cooling measures for spaces and streets outside the development site boundary may be appropriate necessary to mitigate heat risk generated by the development.~~

Commented [NE368]: Policy supporting text amended throughout to make more concise.

for example, to make the public realm more comfortable ~~and attractive for movement by walking and cycling. This is consistent with, in line with~~ the Healthy Streets ~~a~~Approach ~~advocated by the Local Plan, in line with the draft London Plan.~~

~~11.24.11.26.~~ All major development proposals ~~will be expected to~~must submit an Energy Statement ~~as part of the Sustainable Design 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 approach. We will ~~seek to resist/refuse~~ 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.

~~11.25.11.27.~~ ~~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 within the cooling hierarchy will often depend on~~ the nature and scale of development. Minor developments, ~~and in particular such as~~ 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. ~~Poor a~~Air quality is a significant public health issue in Lewisham. All new development ~~should~~must use the design-led approach and integrate on-site measures to contribute to improving/improve air quality ~~within the Borough and reducing/prevent or minimise~~ the population's exposure to poor air quality, ~~having regard to, 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. ~~All New major development proposals must be at least air quality neutral and all development proposals must demonstrate that they will not:~~
- ~~a. Seek to improve air quality and be at least air quality neutral;~~
 - ~~a-b. Not l~~Lead to ~~a~~ further deterioration of existing poor air quality;
 - ~~b-c. Not c~~Create any new areas that exceed air quality limits, or ~~compromise the achievement of~~delay the date at which compliance ~~with targets~~will be achieved in areas that ~~are~~ currently in exceedance of ~~the~~ legal limits; and
 - ~~c-d. Not c~~Create ~~an~~ unacceptable risk of high levels of exposure to poor air quality.
- ~~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~~

Commented [NE369]: Amended to emphasise the use of design-led approach to address air quality

Commented [NE370]: Respond to consultation - amended to align with London Plan including policy which requires all developments (not just majors) to be at least air-quality neutral

~~(including public open space) and vulnerable groups, such as children and older people.~~

D.C. Air Quality Assessments ~~will be required to~~must 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 ~~(including public open space)~~ that are likely to be used ~~regularly by large numbers of particularly~~ vulnerable groups, such as older people and children and young people.

E.D. 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.E. Development proposals will be considered having regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of ~~(BA)~~ and ~~(CB)~~ above will be ~~resisted refused~~ unless it can be suitably demonstrated that 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 on-site mitigation is not feasible, impracticable or inappropriate,~~ off-site provision may be acceptable where equivalent air quality benefits will be delivered in the ~~local~~ area affected by the development.

Figure 11.2: Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs)

Explanation

~~11.26.11.28.~~ 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.⁸² 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

Commented [NE371]: Amended to make more concise and avoid repetition – the requirements have been brought into QD7 Amenity and agent of change, along with criterion A above and C below.

Commented [NE372]: Amended to bring in criteria from B above, which has been deleted and incorporated elsewhere

Commented [NE373]: Amended for clarity and to aid policy implementation

⁸² Lewisham Joint Strategic Needs Assessment, A Picture of Lewisham. 2019.

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.~~

Commented [NE374]: Removed to make more concise and avoid repetition covered elsewhere in plan

11.29. There are currently 6 AQMAs in Lewisham with two major AQMAs. 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. An assessment of air quality in Lewisham has shown a decreasing trend in the levels of two pollutants, nitrogen dioxide (NO₂) and particulate matter (PM) in recent years. However more needs to be done to meet the guidelines set out by the World Health Organisation. In Lewisham, the highest concentrations of nitrogen/nitric oxides (NO_x), NO₂ and PM which breach the legal limits are found on the busiest main roads. However, pollution levels quickly reduce with distance from the pollution source.⁸³

Commented [NE375]: Respond to consultation – The footnote below is provided to clarify that consideration must be given to both PM10 and PM2.5

Commented [NE376]: Factual updates with information from draft Lewisham Air Quality Management Action Plan.

11.28-11.30. 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 11.2 and may be subject to periodic review and updating. Development proposals within AQFAs must submit a desktop Health Impact Assessment in line with Policy DM5 (Health Impact Assessments).

Commented [NE377]: Respond to consultation – a new policy has been included on Health Impact Assessments to respond to concerns about air quality other factors impacting public health – See Part 4 Policy DM6

~~11.29-11.31. New major development will be required to must be at least 'air quality neutral' and not development shall lead to a further deterioration of existing poor air quality, in line with the London Plan. Development proposals should must 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. The Healthy Streets Approach should be used wherever possible to address poor air quality. Development proposals will be considered taking into account individual and cumulative impacts of development in an area, consistent with national policy.~~

Commented [NE378]: Respond to consultation – the Healthy Streets Approach should be signposted in the air quality policy

Commented [NE379]: Amended to align with London Plan and NPPF

⁸³ Draft Lewisham Air Quality Management Action Plan 2022-2027 (2021). Lewisham AQMA declared in 2001 for exceedances in annual mean NO₂ and 24-hour mean PM¹⁰ concentrations and Crofton Park and Honor Oak Park AQMA declared in 2013 for exceedances in annual mean NO₂ concentrations. It is also important that development proposals consider PM^{2.5} which are smaller particles than PM¹⁰, in line with the Mayor of London target to align with the WHO guidelines.

~~41.30;11.32.~~ Applicants should refer to ~~refer relevant~~the 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 reports should also be referred, along with our Good Practice Guide: Control of Pollution and Noise from Demolition and Construction Sites.

~~41.31.~~ ~~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 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.~~

~~41.32;11.33.~~ Air Quality Assessments (AQAs) will be required for ~~certain types of~~ qualifying development ~~set out in the policy and Assessments~~. must address impacts arising during the construction, occupation and operation~~al~~ phases of development. They should also consider the wider cumulative impacts on air quality arising from development within the locality.

~~41.33;11.34.~~ 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.

~~41.34;11.35.~~ 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.

~~41.35;11.36.~~ 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.

Commented [NE380]: Removed to make more concise – these points are addressed in policy above and London Plan.

SD 7 Reducing Minimising and managing flood risk

- A. The Council will ~~w~~Working in partnership with stakeholders to implement the flood risk management actions in the Thames Estuary 2100 Plan. To minimise and manage flood risk development proposals must: ~~and seek to reduce flood risk and ensure resilience against the impact of flooding by:~~
- a. ~~Using~~Apply 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;
 - b. Requiring that all new development does ~~n~~ot increase flood risk in the Borough, ~~and~~ reduces the risk of flooding from all sources;
 - c. Make space for water by providing an undeveloped setback from rivers and other watercourses; ~~and~~
 - d. Where appropriate, ~~provide~~carry out a condition survey of existing flood defence and other watercourse infrastructure and if necessary, provide for maintenance, repairs or remediation to secure ~~the~~its functional integrity of this infrastructure over the lifetime of the development. This includes raising the Thames Tidal Defences in accordance with the TE2100 plan, in the case of riparian ownership of land; ~~and~~
 - ~~e.e.~~ Be is designed to remain safe and operational under flood conditions.;
 - ~~d.a.~~ 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 (FRA) 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~~FRA must provide sufficient ~~evidence~~information for the Council to assess whether the requirements of the Sequential and Exception Tests have been satisfied, ~~and will be expected to~~The FRA must:
- 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 ~~development~~proposals satisfy the Sequential and Exception Tests ~~the site layout and they must be~~ design~~ed~~ of development~~to~~ should ensure that:
- a. The most vulnerable land uses are directed to areas of the site that are at lowest risk of flooding;

Commented [NE381]: The Local Plan water management and flood risk policies have been restructured throughout for legibility.

In addition, these policies have been strengthened where possible in response to consultation feedback (including from the Environment Agency) and findings of the Local Plan Integrated Impact Assessment. The IIA identified that flood risk was a key sustainability issue in terms of the spatial strategy, given that a significant amount of the land available for development was located within flood zones, and this would need to be appropriately managed in line with national policy.

Commented [NE382]: Moved from SD9 Lewisham's waterways

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Commented [NE383]: Repetition – the sequential approach is referred in A.a above. This is well established by the NPPF which sets out further details in this respect

Commented [NE384]: Respond to consultation-addition requested by Environment Agency

Commented [NE385]: Moved from SD9 Lewisham's waterways

Commented [NE386]: Respond to consultation – addition requested by Environment Agency

Commented [NE387]: Moved to A above

Commented [NE388]: Repetition – this point is covered in SD9 Lewisham's waterways

Commented [NE389]: This is set out and explained in the supporting text and supported by the NPPF

- 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; and
- ~~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.~~

Commented [NE390]: Repetition – covered in criterion A.b above

- D. Development proposals ~~will be required to~~ must provide a site-specific Flood Emergency Response Plan to manage actual and/or residual flood risk, where appropriate.

Figure 11.3: Flood Zones and Critical Drainage Areas

Explanation

~~11.36-11.37.~~ 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.

~~11.38.~~ 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 Boroughs within 'Action Zone 2 – Central London' of the Plan, where The Local Plan both supports and helps to set a framework for positively managing development consistent with the TE2100 Plan. requirements include future raising of all tidal flood defences together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works and "make space for water" through increased riverside buffer zones of 16 metres for tidal rivers and 8 metres for fluvial rivers, or other distance agreed by the Council and Environment Agency. Riparian landowners have a responsibility to maintain and raise tidal flood defences and follow the latest good practice guidance, such as the Estuary Edges guidance.

Commented [NE391]: Supporting text Moved from SD9

~~11.37-11.39.~~ It is important that New development does not increase flood risk to people and properties and infrastructure, and that all Development proposals should proactively seek to minimise and mitigate flood risk wherever possible. This is particularly important in locations that are known to be at risk of flooding.

Commented [NE392]: Respond to consultation - Addition supporting text and clarification at request of Environment Agency

~~Applicants will be expected to by~~ considering 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 and Port of London Authority is strongly advised.

Commented [NE393]: Respond to consultation – Port of London Authority should be referred for advice

~~11.38-11.40.~~ 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 Level 1 SFRA (2019) maps the Borough into flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures. Flood Zone 3b is the functional floodplain, where water has to flow or be stored in times of flood. The flood zone maps have been prepared using the latest available data from the Environment Agency however Applicants should consult the EA for site specific flood model outputs to better understand flood risk, and to establish whether the flood zones have in the SFRA 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.~~

Commented [NE394]: Respond to consultation – additional clarification points included

~~11.39-11.41.~~ In line with the NPPF ~~and its associated guidance we will apply~~ a sequential approach must be used to the location of new development. This is in order to ensure that new 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 development within the different flood zones~~ having regard to the Sequential and Exception Tests, and ~~informed by Flood Risk Assessments FRAs~~ submitted by applicants. ~~Assessments are required to FRAs~~ must 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 and form the basis of assessments. ~~Furthermore, the~~ Lewisham Level 2 SFRA (2019) ~~sets out evidence of also provides the flood characteristics in the Borough site specific information~~ (including flood depth, velocity, rates of inundation and duration of flooding) ~~that should also be considered.~~ The NPPF states that the Exception Test may be satisfied where development provides wider sustainability benefits to the community that outweigh flood risk. This will be considered on a case-by-case basis however all such development must be demonstrably necessary to support the delivery of the spatial strategy, for example, community or other types of infrastructure.

Commented [NE395]: Respond to consultation – the Local Plan should provide details of what might constitute 'wider sustainability benefits'

~~11.40-11.42.~~ 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.

~~11.41-11.43.~~ Where the Sequential and Exception Tests are satisfied ~~we will seek that development~~ proposals must 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).

~~11.42-11.44.~~ Development pProposals ~~will need to~~must 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.

~~11.43-11.1.~~ 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.

Commented [NE396]: Moved to paragraph 11.37 above

SD 8 Sustainable drainage

A. Development proposals should 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.

Commented [NE397]: Moved from C.a below

A.B. 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: Proposals for major development and development in a Critical Drainage Area must submit a Drainage Strategy.

Commented [NE398]: Respond to consultation - amended for conformity with London Plan

Commented [NE399]: Moved to criterion C below

- a. Rainwater use as a resource.
- b. Rainwater infiltration to ground at or close to source.
- c. Rainwater attenuation in green infrastructure features for gradual release.
- d. Rainwater discharge direct to a watercourse, unless not appropriate.
- e. Controlled rainwater discharge to a surface water sewer or drain.
Controlled rainwater discharge to a combined sewer.

Commented [NE400]: Removed to make plan more concise – the drainage hierarchy is set out in the London Plan, which the policy refers

B-C. Sustainable Drainage Systems (SuDS) should be integrated into development wherever possible with priority given to green and blue over grey measures. 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 in accordance with the latest Construction Industry and Research Association (CIRIA) SuDS Manual or equivalent. In addition, all SuDS should: Development proposals must demonstrate that SuDS will function effectively over the lifetime of development.~~

- ~~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.~~

Commented [NE401]: Moved to A above.

Commented [NE402]: These are addressed by the SuDS non-statutory technical standards, referred in the policy

Commented [NE403]: Addressed in C above

~~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.~~

Commented [NE404]: Respond to consultation – deleted for conformity with London Plan. See B above, all development must achieve greenfield runoff

~~D. SuDS involving infiltration must not have an adverse impact on groundwater sources. Where infiltration is proposed, the Environment Agency should be consulted to consider the suitability of SuDS having regard to the impact of drainage into the groundwater aquifer.~~

Commented [NE405]: Respond to consultation – additional wording requested by Environment Agency

~~C-E. Where it is clearly demonstrated that a greenfield runoff rate cannot be achieved, or SuDS cannot be implemented due to reasons of technical feasibility or financial viability, development proposals must demonstrate that:~~

- ~~a. Ensure that surface water runoff (both in terms of volume and flow) has been reduced as much as reasonably practical; and~~
- ~~b. Investigate and integrate measures to improve water quality have been investigated and implemented, wherever feasible.~~

~~D-F. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable pavingsurfacing, including on small surfaces such as front gardens, and driveways, and car parks, will be strongly resistedrefused unless it can be suitably demonstrated that this is not technically feasible or appropriateunavoidable.~~

Commented [NE406]: Amended for clarity and to aid policy implementation

Explanation

~~11.44-11.45.~~ 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 increasingan~~ 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 Lewisham's~~ London Plan Opportunity Areas ~~corridor~~ and are also widely present in southern part of the Borough.

~~11.45-11.46.~~ New development ~~will be expected to must~~ contribute to minimising and mitigating flood risk through the use of Sustainable Drainage Systems ~~(SuDS) and measures~~. SuDS ~~comprise a sequence of involve~~ management practices and techniques ~~used~~ 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.~~

Commented [NE407]: Removed to make plan more concise – this is covered in the policy

~~11.46-11.47.~~ 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.~~

Commented [NE408]: Repetition – this is referred in criterion C above

~~11.47-11.48.~~ 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 ~~attractiveness and 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 can also~~ support ~~and enhance~~ biodiversity through the creation of habitats, such as ponds and wetlands, ~~along with and by~~ 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.~~

Commented [NE409]: Repetition – this is referred in criterion C above

~~11.48-11.49.~~ 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 must~~ 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~~ CDA. This should include a SuDS Management Plan setting out long-term management and maintenance arrangements.

~~11.49-11.50.~~ If it is suitably demonstrated that ~~the policy requirements cannot be satisfied a greenfield runoff rate cannot be achieved~~, for example, ~~by due to~~ reasons of site condition (e.g. land contamination ~~or other site~~

~~constraints) or financial viability technical feasibility, we will require applicants to provide evidence that development proposals must runoff rates have been minimised runoff rates as far as reasonably practical and maximise measures to improve water quality.~~

Figure 11.4 Safeguarded Wharf at Convoys Wharf

SD 9 ~~Water management~~ Lewisham's waterways

~~Watercourses and flood defences~~

A. Waterways provide multifunctional social, economic and environmental benefits that support sustainable neighbourhoods and communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:

- a. Environmental function and ecological qualities;
- b. Contribution to the Borough's network of open spaces;
- c. Recreational and amenity value;
- d. Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character;
- e. Support for the visitor economy; and
- a-f. Potential to facilitate water transport.

B. Development proposals on sites containing or adjacent to a main river, ~~or~~ ordinary watercourse or other water space will be required to:

- a. 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;
- b. 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.a. _____ 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-d. _____ Incorporate measures to enhance the ecological, amenity, recreational and historic value of water spaces, including by enhancing public access to these spaces.

Water quality

C. 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.

Commented [NE410]: Amended for clarity and to aid policy implementation

Commented [NE411]: The Local Plan water management and flood risk policies have been restructured throughout for legibility.

Commented [NE412]: This has been moved to Policy SD7 Minimising and managing flood risk

~~D.A. Where development is proposed within a Source Protection Zone it must not result in an unacceptable risk to groundwater quality.~~

~~Wastewater and water supply~~

~~E.A. 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.~~

~~F.A. 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.~~

~~G.A. 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.a. Major non residential development should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.~~

~~Strategic role of waterways~~

~~H. Waterways provide multifunctional social, economic and environmental benefits that support sustainable communities. Development proposals should identify and respond positively to the unique attributes of waterways, giving particular consideration to their:~~

- ~~a. Environmental function and ecological qualities;~~
- ~~b. Contribution to the Borough's network of open spaces;~~
- ~~c. Recreational and amenity value;~~
- ~~d. Distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character;~~
- ~~e. Support for the visitor economy; and~~

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f. ~~Potential to facilitate water transport.~~

~~J.D.~~ 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 respond positively 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).

~~J.E.~~ _____ 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 Directions. 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.

~~K.F.~~ Development pProposals 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:

- a. Are demonstrably a water-dependent use;
- b. Are appropriately located and designed, taking into account the nature and scale of the proposed use;
- c. Respond positively 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;
- d. Do not have a detrimental impact on river navigation and flood defence infrastructure;
- e. Do not have a detrimental impact on the environment, including water quality in line with (B) above;
- f. Do not impede or compromise existing public access points to the waterway, and extend or enhance access wherever possible; and
- g. 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. 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

Commented [NE413]: Repetition – covered

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.

~~41.51-11.52.~~ All-Development proposals ~~will be expected to~~ must 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.

~~41.52-11.53.~~ 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.

~~41.53-11.54.~~ 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.

~~41.54-11.55.~~ 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

~~11.55-11.56.~~ 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.

~~11.56-11.1.~~ 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

~~11.57-11.1.~~ 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.

~~11.58-11.1.~~ 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.

~~41.50.11.1. 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.~~

~~41.60.11.1. 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.~~

~~41.61.11.1. 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.~~

~~41.62.11.1. 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 C 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

~~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 respond positively to~~

Commented [NE414]: Moved to new standalone policy SD10 wastewater and water supply

Commented [NE415]: Moved to first paragraph of supporting text above

~~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: Bormondsey to Woolwich set out in sub-regional strategies.~~

Water infrastructure

~~11.57. 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 on 1st March 2021. The existing network dates from 2005 and includes one wharf in Lewisham, Convoys Wharf. The London Mayor undertook a review of the network in 2018⁸⁴ 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.~~

11.58. 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.

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

⁸⁴ [The Safeguarded Wharves Review 2018. Greater London Authority. 2018.](#)

Commented [NE416]: Repetition – covered elsewhere in the plan

Commented [NE417]: Respond to consultation – the plan should be amended with this factual update

SD 10 Water supply and wastewater

- A. Development proposals for new water supply and wastewater facilities or the expansion of existing facilities will be supported where the development:
- Makes provision for infrastructure that is required within the Borough as demonstrated by an asset management or similar investment plan;
 - Will not result in an unacceptable adverse impact on the environment, human health, public safety, amenity and local character; and
 - Will be constructed in a timely and sustainable manner.
- B. Development proposals will be supported where it is should have regard to Drainage and Wastewater Management Plans (DWMPs) and must 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.
- C. Development proposals should ensure the separation of surface and foul water systems, including by rectifying misconnections. The Council will give preference to Proposals should prioritise mains foul drainage and seek to restrict avoid 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, must be implemented, as supported by a Drainage Strategy.
- ~~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:~~
- ~~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);~~
- ~~Major non-residential development should achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent.~~
- D. Development proposals should be designed to be water efficient, reduce water consumption and minimise pressure on the combined sewer network by integrating SuDS and complying with the London Plan requirements for water efficiency. Planning conditions will be applied to ensure that water efficiency standards are met.
- E. Where dDevelopment is proposed proposals within a Source Protection Zone it must not result in an unacceptable will only be supported where there is no risk to of contamination to groundwater quality sources, or if a risk is identified, it is suitably demonstrated that adequate mitigation measures will be implemented.

Commented [NE418]: Respond to consultation – request for policy to provide in-principle support for new water supply and wastewater facilities

Commented [NE419]: Respond to consultation – policy should specifically refer DWMPs

Commented [NE420]: Moved from previous policy SD9 Water Management

F. Development proposals for piled foundations must ensure that disturbances to the ground will not lead to adverse impacts on water quality, including turbidity in the water supply. Development proposals on or in proximity to sites with contaminated land must not introduce new pathways for contamination materials to reach groundwater.

Commented [NE421]: Respond to consultation – inclusion of policy points recommended by Environment Agency and Thames Waster

Wastewater and water supply Explanation

Commented [NE422]: The majority of the policy supporting text has been moved from previous Policy SD Water management

11.60. 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. The Council will continue to work with its key stakeholders, including Thames Water and other water companies, on its Infrastructure Delivery Plan. However, the short-term nature of water companies' investment plans means that it is not possible to identify all of the infrastructure required over the plan period. The Local Plan therefore provides in-principle support for new or upgraded water supply and wastewater infrastructure where required.

Commented [NE423]: Respond to consultation – supporting text included to support new policy SD10.A

11.61. 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 should be referred at sites across the Borough.

11.62. 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 should engage with Thames Water, or other water and sewerage undertakers as appropriate, early in the planning and design stage process. 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 may be required, such as where for major development in is proposed in an areas 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.

11.63. For surface water, New 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. Connections to trunk sewers should be avoided - an alternative point of connection to a non-trunk sewer or requisition a new connection and associated pipe laying will be required. It is the responsibility of a developer to make proper provision for surface water drainage to ground.

water courses or surface water sewer. It must not be allowed to drain to the foul sewer as this is the major contributor to sewer flooding.

Commented [NE424]: Respond to consultation – recommended supporting text to aid policy implementation

11.64. 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 'supersewer' will run across London and capture flows from sewer overflow points along the River Thames. There are two 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. New development should not adversely impact on the construction, operation and long-term maintenance of the tunnel infrastructure.

11.65. 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. The Environment Agency has been declared the Thames Water region as an area of to be "seriously water stressed" and this trend is likely to be exacerbated by climate change. The Council This policy 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.

11.66. All development should be designed to maximise water efficiency. New residential development will be required to must meet the draft London Plan target standard 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 must 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 must provide robust justification where such a system this is not considered feasible. Planning conditions will be used to ensure water efficiency targets are met.

11.67. 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 Development proposals appropriately must consider assess 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 refused.

SD 4011 Ground conditions

Contaminated land

A. Development proposals that will enable contaminated sites to be brought back into beneficial use will be supported where the requirements of B-D below are satisfied.

Commented [NE425]: Respond to consultation – Local Plan should be more proactive in supporting land remediation to enable development to come forward

A-B. Development proposals must demonstrate that any risks associated with land contamination, including to human health, public safety and the environment, ~~can~~ will be adequately addressed in order to make the development safe.

B-C. ~~All proposals for D~~ development proposals on land which is suspected of being contaminated or potentially contaminated, or if a sensitive use is proposed, ~~will be required to~~ must 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~~

D. 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, public safety and the environment.

C-E. Planning conditions may be applied to ensure that remedial measures will be implemented and the development is safe prior to occupation.

Commented [NE426]: Respond to consultation – the Council should seek to use planning conditions to secure remedial measures for contaminated sites

Explanation

Contaminated land

~~11.66~~11.68. 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.

~~11.67~~11.69. In order to appropriately identify and manage the risks associated with land contamination ~~we will require~~ development proposals ~~to~~ must 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.

~~11.68~~11.70. The Council's Environmental Protection (~~EP~~) service maintains a Contaminated Land Register and the ~~EP-Council's~~ website ~~pages~~ provides 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.

~~11.69~~11.71. 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

~~11.70~~11.72. 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.

~~11.74~~11.73. 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 4412 Reducing and sustainably managing waste

- A. The Council will ensure that waste is sustainably managed in ways which protect human health and the environment. 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 the waste hierarchy and follow the circular economy principles ~~in the design and construction process~~, in line with Policy SD 123 (Design to support the circular economy).

- B. To help London achieve ~~net~~ waste net self-sufficiency, ~~and ensure~~ meet the Borough's strategic waste apportionment target ~~is met and other requirements, including the London Mayor's recycling or composting targets,~~ 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~~ are strategically safeguarded waste sites in Lewisham:
 - a. South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross
 - b. Recycling Centre (HTL Waste Management Services), New Cross
 - c. Reuse & Recycling Centre (London Borough of Lewisham), New Cross.

- C. Development proposals that will result in the loss of an existing waste site through a change of use will only be permitted where adequate replacement waste processing capacity is secured in accordance with London Plan policy S19 (Safeguarded waste sites).

- D. Development proposals for new waste management facilities will only be permitted where:
 - a. They are required within the Borough to meet an identified strategic need, having regard to the proximity and self-sufficiency principles;
 - b. 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;
 - c. They are located within a Strategic Industrial Location and have high quality supporting infrastructure necessary for the intended use;
 - d. 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 S18 (Waste capacity and net waste self-sufficiency); and
 - e. 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.

- E. Development proposals for waste management facilities must be located and designed with reference to the Agent of Change principle. They should be fully enclosed on all sides and have a roof along with fast-acting doors, and must be

Commented [NE427]: Amended to ensure the local plan aligns with the Council's adopted and emerging Waste Management Strategy, and in line with the Waste Framework Directive

Commented [NE428]: Respond to consultation – recognition that there are additional sites with licenced waste capacity (i.e. Environment Agency permits) which are safeguarded in line with the London Plan

Commented [NE429]: Amended to aid effective policy implementation – the proximity principle is that waste should be managed as close to its source as possible, and is set out in higher level policy

Commented [NE430]: Respond to consultation – additional criterion to ensure waste management facilities are appropriately supported by infrastructure

designed with these measures where the development is likely to have a significant impact on impact on local amenity.

E.F. Where development proposals involve alterations to an existing waste management facility, they must demonstrate how they have maximised opportunities to improve the environmental performance of the facility as well as to reduce and mitigate its impact on local amenity.

Explanation

11.72-11.74. The waste hierarchy (see Figure 11.6) is set out by the Waste Framework Directive⁸⁵ and provides a framework for how waste management can be made more sustainable. The aim is to move up the hierarchy away from a reliance on waste disposal. The draft London Plan advocates principles on the 'circular economy' as a strategic approach to the sustainable use and management of materials and waste (see Figure 11.7) aligns with the hierarchy. 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 Figure 11.6 below. These principles should be applied in the design and construction stages of all new development. The successful implementation of these waste hierarchy and circular economy principles will help are necessary to reduce the volume of waste that is produced and will need to be managed both in Borough and across London. Targets for recycling and composting are set out in the Council's Waste Management Strategy. 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.

11.75. The draft London Plan includes a strategic objective for London to be net waste net self-sufficient by 2026. This means that all waste generated in the city London 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.

Commented [NE431]: Respond to consultation – request for additional criterion to protect amenity and to ensure conformity with London Plan

Commented [NE432]: Respond to consultation – included to help address concerns with existing safeguarded waste facilities on public health and environment

Commented [NE433]: Supporting text amended to explain the waste hierarchy.

Commented [NE434]: Removed to make more concise – covered by the London Plan, which is referred in the policy

Commented [NE435]: Amended to signpost Council's strategy

Commented [NE436]: Removed to make more concise – covered by the London Plan, which is referred in the policy

⁸⁵ Directive 2008/98/EC of the European Parliament and of the Council, 19 November 2008.

~~41.73.11.76.~~ There are 3 strategic waste management sites safeguarded in the Local Plan, which are located within the Strategic Industrial Location, SIL at Surrey Canal Road. In addition, there are a number of sites within the Borough with waste management permits from the Environment Agency. The London Plan states that waste sites should only be released to other land uses where waste processing capacity is re-provided elsewhere within London, based on the maximum achievable throughput of the site proposed to be lost.

Commented [NE437]: Respond to consultation – reference made to explain London Plan requirements on safeguarded waste sites, in line with policy addition C above

~~41.74.11.77.~~ 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. Development pProposals 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, and also having regard to the proximity and circular economy principles. We will expect-require 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, taking into account the technical feasibility and financial viability. 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, SILs, 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 B4-E(g) (office and light industrial) uses to meet future employment needs. All Development 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 S18 (Waste capacity and not waste self-sufficiency).

Commented [NE438]: Amended to make more concise – this is stated in the policy above.

Table 11.1 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,	0.24 ha	TBC	5,660

	Lewisham, SE14 5RS			
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Figure 11.5 Safeguarded Waste Sites

[Figure 11.6 Waste hierarchy – new figure to be included](#)

Figure 11.76 Circular Economy Principles (London Plan and Dave Cheshire, AECOM)

SD ~~42~~13 Design to support the circular economy

- A. ~~All~~ development proposals ~~will be expected to~~ should apply the circular economy principles set out in the London Plan 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 S47 (Reducing waste and supporting the circular economy).
- C. Development proposals ~~will be expected to~~ must 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~~ They must 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

~~11.75. 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.~~

Commented [NE439]: Policy text amended throughout to make more concise.

~~11.76.11.78. Applicants Development proposals~~ should refer London's circular economy route map⁸⁶ 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, m~~Major development proposals ~~will be required to present significant opportunities for innovative design and construction. They must~~ submit a Circular Economy Statement demonstrating how the circular economy ~~hierarchy principles~~ ~~have~~ 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.

Commented [NE440]: Repetition – covered in Policy SD11 above

~~11.77.11.79.~~ Development proposals should ~~seek to~~ maximise opportunities ~~for to~~ ~~design~~ 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 ~~and residential land values~~ in the Borough. However this should not discourage ~~applicants from considering building options designs~~ that can extend the life of developments, for example, ~~by using with~~ durable materials and ~~designing adaptable~~ spaces ~~that can be modified to the needs of different users~~. Non-residential developments, such as retail and commercial uses, are likely to

⁸⁶ London's circular economy route map, GLA & London Waste and Recycling Board. 2017

have shorter lifespans [or a range of end-users](#) and are therefore well [positioned to support more comprehensive approaches](#) suited 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.](#)

~~41.78-11.80.~~ All development proposals [will be expected to must](#) consider options for sustainably managing the materials used and arising from the development [using the design-led approach](#). [Consideration at the early stages in the design process will help to](#) [This will](#) 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, particularly in the interests.~~ [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.

~~41.79-11.81.~~ 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

What you've told us

Public transport improvements needed

- [Wide support for the Bakerloo line extension](#)
- [Better bus routes and more reliable services are needed, especially in areas lacking good rail services](#)
- [Concerns with overcrowding on train platforms](#)
- [More trains are needed on the Catford Loop line](#)

Walking and cycling should be encouraged by:

- [Making routes and pathways safer and easier to use](#)
- [Improving routes between parks and open spaces](#)

Concerns with local roads

- [Many are too busy and polluted](#)
- [Vehicles passing through the borough add to traffic and congestion](#)
- [Too much reliance on main roads, such as the South Circular](#)

- Safety on major roads, especially in and around town centres

Mixed views on car parking

- Car-free development must be carefully considered
- Pressure for parking on streets if new residents are not provided with spaces
- Local businesses often rely on parking for customers

What we've learned

Some parts of Lewisham are more accessible than others

- The DLR, Overground and rail services link with Lewisham. But these are mainly north-south routes, and there is no direct access to the Underground.
- Most areas in the north are better served by public transport than those in the south.
- More people own cars in areas lacking good access to public transport

Pollution and congestion

- Major roads (such as the A21, A2 and South Circular) are often congested and pollution hotspots.
- Traffic affects bus journey times—busy (high frequency) routes take about 20% longer than intended
- The Ultra Low Emission Zone (ULEZ) will be extended to north Lewisham

Public transport: improvements planned but more investment needed

- The Bakerloo line extension will greatly improve transport access in Lewisham and south London—land must be safeguarded for stations and routes.
- Funding secured for upgrades to the Overground and DLR will improve services, including a new Overground station in Deptford
- Foot traffic at Lewisham interchange has tripled over the past 15 years
- New platforms at Brockley station would allow for an interchange between the Overground and the Lewisham-Victoria rail line
- Stations and platforms are becoming busier at peak travel times, with some overcrowding
- Not all stations in the Borough have step-free access
- Our research suggests there are some 280,000 trips daily that could be made by bicycle instead of a car or public transport.

Main issues

Public transport access

Lack of public transport options in many parts of Lewisham limits people's access to opportunities—for schools, jobs, services and community facilities.

North-South links Lack of east-west routes

Lewisham benefits from good north-south links to and from central London but east-west routes are lacking, making trips across Lewisham and into neighbouring areas more difficult.

Rising demand for services

Population growth will increase demand for public transport. Improved facilities and services are needed to keep journeys safe and convenient.

Improving transport options

There is potential to boost the number of journeys made by walking and cycling by investing in new and improved routes.

Environmental impacts

Vehicle use and traffic contributes to pollution and carbon emissions.

We're proposing to...

Promote walking and cycling

- Make trips by walking, cycling and public transport safer and more convenient
- Carefully manage the amount of car parking

Make neighbourhoods healthier and more liveable

- Transform major roads into 'Healthy Streets' that are greener and safer for walking and cycling
- Create the 'Lewisham Links', a network of high quality walking and cycle routes that link green spaces

Secure improvements to the transport network

- Work with partners to deliver the BLE and Lewisham interchange upgrade to improve accessibility and support growth
- Re-route the South Circular to help regenerate Catford town centre
- Enable river bus services with a stop at Convoys Wharf
- Require new developments to help fund transport improvements

We've also considered

- How to plan for the future if the Bakerloo line extension is not delivered, or arrives later than expected.
- If the regeneration of Catford major centre can be delivered without re-routing the South Circular.
- Using London Plan parking standards, but using a local approach for car-free development

Commented [NE441]: Not required for Regulation 19 plan

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, [safe](#), healthy, liveable, walkable and sustainable neighbourhoods in Lewisham. Development proposals [will be expected](#) [must](#) 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. Priority should be given to reducing car use and improving opportunities for movement by walking, cycling and the use of public transport.

- B. Development proposals ~~must aim to~~ seek to improve and ~~must~~ not adversely impact on the effective functioning and safe use of Lewisham's transport network and public realm, including walking and cycling transport infrastructure.
- 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 respond positively to the need to facilitate the delivery of, the Borough's network of transport infrastructure.
- D. To encourage a shift away from car use 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 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; and
 - ~~e.d.~~ Expansion of cycle hire.
- E. Development proposals must demonstrate how they will contribute to sustaining and creating healthy, liveable and walkable neighbourhoods. ~~Development-They~~ should use the design-led approach to maximise opportunities to ~~improve the remove~~ barriers and introduce measures that encourage and enable movement by walking and cycling ~~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~~ walking and cycling transport infrastructure, deliveries and servicing, and the Bakerloo line extension). 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 transport infrastructure and network, will be refused unless it can be demonstrated that adverse impacts will be avoided or appropriately mitigated. Proposals will be

Commented [NE442]: Respond to consultation – clarify that the network includes walking and cycling infrastructure

Commented [NE443]: Respond to consultation – request for addition of this scheme

Commented [NE444]: Respond to consultation – request for these additions

expected to deliver direct mitigation measures, with suitable alternative provision that is agreed by the relevant transport authorities and service providers, including Transport for London, 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/or walking/cycling 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. The Council will use measures to ensure that development is appropriately phased, in order to avoid excessive strain on the transport network and to ensure additional infrastructure demands arising from the development (including for community and green infrastructure) can be appropriately accommodated.

Table 12.1 – Indicative list of strategic transport schemes

Scheme	Timeframe
Public transport	
Bakerloo line 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
Healthy streets and active travel	
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

Figure 12.1: 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, [the Council's Local Implementation Plan and the Lewisham Cycle 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; as in inner-London borough, Lewisham's modal shift target is 90

Commented [NE445]: Respond to consultation – request that Council's relevant key plans and strategies signposted

per cent. 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 poor air quality and noise.

- 12.2. There is an uneven distribution of [public](#) 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](#) is 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 respond positively 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 approach, 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

Commented [NE446]: Respond to consultation – removed for clarification

Commented [NE447]: Repetition – already set out in policy and covered elsewhere in plan

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.

Figure 12.2 Proposed Bakerloo line route and potential stations

TR2 Bakerloo line extension

- A. The Bakerloo line extension is fundamental to improving accessibility and supporting strategic growth and regeneration objectives in Lewisham and southeast London. The Council will work in partnership with stakeholders to secure the timely delivery of the BLE, in accordance with the ~~draft~~ London Plan. It will also seek to maximise the opportunities associated with the BLE by directing investment to significantly improve accessibility across the Borough, tackle deprivation and optimise the development potential of local areas and sites.
- B. Development proposals will be required to facilitate the delivery of the Bakerloo line 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 must demonstrate that development will not preclude or delay the delivery of the Bakerloo line extension, and will will not lead to excessive cost in the delivery, and must be compatible with the BLE (for example, in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites. Development proposals must also be designed to optimise the accessibility provided by its introduction of the BLE into the

Commented [NE448]: Respond to consultation – request for wording to strengthen policy

local area. This may include provision for new or improved public realm and [transport](#) infrastructure enhancements.

- D. Development proposals should optimise the use of land and capacity of sites taking into account the Bakerloo line 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).

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 commits to extend the Bakerloo line from Elephant and Castle to Lewisham and beyond. We 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.

[12.10.](#) [The Secretary of State has made formal safeguarding Directions for the Bakerloo line extension which will support the project in safeguarding sites and routing alignment. The Bakerloo line extension will make a higher number of homes possible within the existing Opportunity Area and that proposed at Bell Green/Lower Sydenham. As such, the extension is a catalyst for change, providing an opportunity to enhance the transport offer at Lewisham town centre which will support and enable growth while also enhancing the public realm and connectivity. At Lewisham, it will also provide an improved strategic public transport hub with improved National Rail and DLR stations and bus services. The directions require the local planning authority to consult TfL on planning applications within the safeguarding zone'. A map of the safeguarding direction is included in Schedule 10.](#)

~~12.10.~~ [12.11.](#) [_____](#) The Bakerloo line extension is 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. Finally, the scheme will play an integral role in delivering wider sustainability benefits such as enabling modal shift away from cars, reducing carbon emissions and improving air quality.](#)

~~12.11.~~ [12.12.](#) [_____](#) Given the expected transformative effects of the Bakerloo line 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

Commented [NE449]: Respond to consultation – this factual update should be included in the plan for clarity and to aid policy implementation

for the construction and operation of the extension, including for its route, stations, portals, ventilation shafts and other operational functions. The nature and phasing of new development close to the route alignment or sites required for stations or construction has the potential to impact upon the deliverability of the scheme. Proposals within 400 metres (approximately 5 minutes walking distance) of a proposed Bakerloo line station will be heavily scrutinised and must demonstrate how they will ensure that development will not prejudice the scheme's delivery, and responds positively 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.

~~12.12.12.13.~~ Development proposals should optimise the use of land and capacity of sites taking into account the Bakerloo line 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, in line with the Policy TR1.H (Sustainable transport and movement) and ~~draft~~ London Plan Policy T4.D (Assessing and mitigating transport impacts).

Figure 12.3: Bakerloo Line Extension map

Figure 12.4: Strategic walking and cycling routes

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 inclusive, healthy, safe, liveable, walkable and sustainable neighbourhoods. Priority will be given to approaches and measures that encourage and help to improve the enable movement by walking, and cycling experience, along with travel by and public transport, including high quality public realm, so they become people's preferred choice of travel in Lewisham.
- B. Development proposals will be required to must demonstrate how they have considered and applied the ~~draft~~ London Plan Healthy Streets Approach and Indicators. All major development proposals will be required to must submit a Healthy Streets Assessment as part of the Transport Assessment. Proposals will be supported where they have engaged positively with the Healthy Streets Approach through the design-led approach to deliver public realm and other improvements that support walking, cycling and the use of public transport. Cycle infrastructure must be designed in accordance with the London Cycling Design Standards.
- C. The Healthy Streets Approach will be given particular priority have particular importance along Growth Corridors and other 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

Commented [NE450]: Respond to consultation – plan should be more proactive and positive in encouraging modal shift, not just encourage but 'enable' in line with London Plan

Commented [NE451]: Respond to consultation – request that the London Cycling Design Standards are embedded in the plan

Commented [NE452]: Respond to consultation and information session feedback – to clarify that the healthy street approach applies to all streets; policy continues to reflect that this will have particular significance on key corridors where significant growth is planned and where development can deliver improvements directly on site

transport accessibility and/or areas experiencing deprivation. Development proposals must have regard to relevant guidance that supports corridor improvements, including the Council's A21 [Design-Guidance-SPD-Development Framework](#).

- D. Development proposals ~~should~~**must** safeguard and contribute to [maintaining and enhancing the Borough's network of walking routes and cycling routes/cycleways](#), including the ~~strategic routes of the~~ Thames Path, South-East London Green Chain, ~~and the Waterlink Way, along with Cycle Superhighways and Quietways~~ and the [Lewisham Links](#). Opportunities to enhance connections between existing and proposed future routes should be investigated and implemented wherever appropriate and feasible. ~~Development p~~Proposals that adversely impact on the safety, quality and convenience of the Borough's network of walking [routes](#) and ~~eyeling routes/cycleways~~, and associated infrastructure (including dedicated cycle parking provision), will be ~~strongly resisted~~**refused** 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 [and enable](#) active modes of travel. This includes measures to reduce vehicle dominance and enhance site access, permeability and connectivity by maintaining or integrating safe and legible routes for walking and cycling along with removing barriers to movement, such as gates, guardrails and stepped kerbs.
- 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, in line with the parking standards of Policy TR4 (Parking).
- G. To help facilitate 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 walking 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).

~~H.I.~~ [To help support modal shift the Council will work positively with its partners and stakeholders to raise awareness of active travel and to enhance opportunities for the public to access related training and funding.](#)

Explanation

Commented [NE453]: Terminology updated to reflect term 'cycleways' in line with London Plan and Mayors Transport Strategy

Commented [NE454]: Respond to consultation – to reflect other ways in which the council can promote modal shift

~~42.13~~.12.14. 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.

~~42.14~~.12.15. 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 movement by walking and cycling, making active travel a more attractive option for people to move throughout the Borough.

~~42.15~~.12.16. 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.

Figure 12.5 Healthy Street Wheel (Lucy Saunders)

~~42.16~~.12.17. 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 walking and cycle 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 walking and cycle routes 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.

~~42.17~~.12.18. 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.

~~42.18.12.19.~~ 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.

~~42.19.12.20.~~ Improving safety on Lewisham's roads is also a key objective of this policy. Interventions that prioritise safe movement by walking and cycling, and which may consequently impact on car use and 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.

~~42.20.12.21.~~ 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. Development proposals should be designed to promote and enable safe movement by walking, cycling and the use of public transport. A carefully managed approach to parking provision, and particularly car parking, will be taken recognising the varying levels of access to public transport across Lewisham. Proposals should seek to reduce car use to support the Local Plan's strategic objectives to support the delivery of inclusive, healthy, safe, and liveable and sustainable neighbourhoods, including by significantly reducing air pollution and greenhouse gas emissions. In line with the London Plan, car-free development should be the starting point for all development proposals in places that are, or are planned to be well-connected by public transport (having regard to the spatial strategy), with developments elsewhere designed to be car-lite.~~

~~B. Development proposals for car-free development will be supported where they are located in highly accessible and well-connected locations. Elsewhere, car-free development will only be supported where it can be suitably demonstrated that:~~

Commented [NE455]: Respond to public consultation - This policy has been amended throughout to ensure conformity with the London Plan and to respond to requests to raise the profile of, and strengthen policies on cycling provision

Commented [NE456]: Repetition – this is covered in Policy TR1 Sustainable transport and movement and TR3 healthy streets

Commented [NE457]: Repetition – this is covered elsewhere in the plan

- a. ~~The development is appropriately located at a well-connected and accessible location with good walking and cycling access to local amenities and services;~~
~~or~~
- b. ~~The development is appropriately located within an Opportunity Area, Growth Node, Regeneration Node, Growth Corridor or town centre where the Local Plan makes provision for significant public realm enhancements that will bring about attractive conditions for walking and cycling and improve access to local amenities and services; and~~
- c. ~~The development is located within an existing Controlled Parking Zone (CPZ), or it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development; a future CPZ can be established through planning contributions;~~
- d. ~~There is sufficient capacity on the public transport network or potential for active travel interventions or implementation of Low Traffic Neighbourhoods in the locality area to cater to the additional demand arising from the development, taking into account existing and planned transport infrastructure;~~
~~and~~
- e. ~~There will be no adverse impact on existing provision of on-street parking;~~

~~A.C. 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, and should must not exceed the maximum car parking requirements and standards set out in draft the 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.a. Residential parking;~~
- ~~e.b. Office parking;~~
- ~~f.c. Retail parking; and~~
- ~~g.d. Hotel and leisure uses parking (including consideration of coach parking).~~

~~B. 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. Development proposals must make adequate provision for residential and non-residential disabled persons parking, recognising that car-free development has no general parking but should still provide disabled persons parking. All such provision must be in accordance with the relevant London Plan standards and the requirements for design and management of parking bays.~~

~~C. 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~~

- ~~a. Disabled persons parking and access arrangements.~~
- ~~b. Cycle parking and associated end-of-trip facilities.~~

- e. ~~Car share or car club parking.~~
- d. ~~Family dwelling car parking~~
- e. ~~Other occupant parking~~
- f. ~~Visitor parking.~~

E. ~~Development proposals must make provision for high quality and fit-for-purpose cycle parking in accordance with the London Cycling Design Standards. They must meet and wherever possible seek to exceed the minimum cycle parking standards set by London Plan (which for Lewisham are the 'higher minimum' standards). This includes sufficient provision of short and long-stay spaces along with spaces to accommodate larger cycles including adapted cycles for disabled people and cargo bikes.~~

D-F. ~~Major development proposals, development proposals located within town centres and employment locations areas, or other developments likely to generate a significant number of visitors should investigate opportunities to integrate dedicated space for cycle hubs to accommodate provision of cycle parking including for cycle hire schemes, as well as and space for cargo bikes wherever possible. Proposals for the comprehensive development of sites, including through masterplans, must demonstrate how they have maximised opportunities to deliver this provision in order encourage and enable cycling.~~

~~E.A. Development proposals for car-free development will be supported where they are located in highly accessible and well connected locations. Elsewhere, 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 accessible location;~~
- ~~b.a. The development is located within an existing Controlled Parking Zone (CPZ), or it can be demonstrated that there is no capacity on the existing local road network to accommodate the parking demand generated by the development;~~
- ~~c.a. 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.a. There will be no adverse impact on existing provision of on street parking;~~

F-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.~~

G-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 is Permit Free (except for Blue Badge holders). Proposals for new car-free development must be Permit Free.~~

H-I. ~~A minimum of 20 per cent of total car parking spaces provided on-site are to have active provision of electric charging points for electric or Ultra-Low Emission vehicles, with a minimum of a further 40 per cent designed with the cabling prepared for future use passive provision for all remaining spaces. In the case that a development has a Travel Plan in place, the levels of usage of electric or Ultra-Low Emission vehicles should be monitored, with new charging points installed as demand increases.~~

Commented [NE458]: Respond to consultation – London Plan conformity and request for London Cycle Design Standards to be given effect in the plan

Commented [NE459]: Moved to B above.

~~J.~~ Parking Design and Management Plans (PDMPs) will be required to must be submitted with applications for Major development and other development proposals that include parking. PDMPs must also be submitted for development proposals without parking but which 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. Cycle parking provision should be considered by Parking Design and Management Plans.

Commented [NE460]: Removed – this is not a definitive list and is not considered to be helpful; this will need to be considered on a case-by-case basis

K. Development proposals for residential and commercial uses will be expected to investigate opportunities to implement rapid electric vehicle charging points, having regard to the Council's Low Emissions Vehicle Charging Strategy.

Commented [NE461]: Deleted as the PDMPs must address all types of parking, not just car parking

~~L.~~ Surface-level car parking should be designed to be permeable, with reference to Policy SD8 (Sustainable drainage).

Commented [NE462]: Amended to 'future proof' and provide flexibility for different types of technologies

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. Where development proposals for housing require the provision of parking, the allocation of spaces should be provided having regard to the sequential approach set out in TR4.D however recognising that types 3,4,5 and 6 may not be necessary or appropriate in all cases.

~~12.22.~~ An effective and well-functioning road network is essential to supporting local businesses and London's economy, the resilience and efficiency of emergency services and the public transport network, as well as for enabling people to move about the city (particularly those who are less mobile). As the population grows the road network will not be able to absorb the additional cars that would result from continued levels of car ownership and use. In order to realise the Local Plan's strategic objectives and the London Mayor's objective for 90 per cent of journeys in inner-London to be made by walking, cycling and the use of public transport, parking must be carefully managed and controlled. Reduced car parking provision together with improved walking and cycling infrastructure can support the creation of places that are designed for people rather than vehicles.

~~12.23.~~ The London Plan parking standards will be applied including the maximum standards for car parking. The London Plan makes clear that car-free development should be the starting point for all development proposals in places that are, or are planned to be well-connected by public transport, with developments elsewhere designed to provide the minimum necessary car parking (car-lite). Development proposals must demonstrate that the level of car parking provision is appropriate having regard to site circumstances including the site's context in relation to the spatial strategy for the Borough.

~~12.22.12.24.~~ When assessing proposals against the parking standards, we will take into account the presence of step-free access at stations. Whilst some areas of the Borough may benefit from high Public Transport Accessibility Levels, the lack of step-free access at stations can significantly constrain travel options and 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. We will continue work with key stakeholders, such as Transport for London and Network Rail, along with development industry partners to address the need to deliver step-free access and/or there are no immediate funding commitments to deliver this provision by the time of the development's occupation which is necessary for inclusive and well-connected neighbourhoods.

~~12.23.12.25.~~ New development will be expected to deliver and help to facilitate proposals must be designed to encourage and enable movement by walking and 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) provides that Lewisham is a borough where the 'higher minimum' 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.

~~12.25.12.26.~~ 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, whilst recognising spaces do not count towards the cycle parking requirement for new development. The use of cycle hire schemes 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 and cargo bikes, so that they can be sensitively integrated into the site and neighbourhood. This is particularly for major development proposals, proposals within town centres and employment locations or those which are likely to attract a significant number of visitors (for example, cultural or education facilities).

~~12.26, 12.27. Whilst it is recognised that some residents and commercial uses in less well connected areas will continue to rely on vehicles, the use of car clubs and electrically charged or Ultra-Low Emission vehicles can provide an alternative to car ownership and conventional gas fuelled vehicles. Their use can help to reduce harmful greenhouse gas emissions and mitigate impacts on climate change. We will therefore encourage d~~Development proposals must to make provision for rapid electrical vehicle charging points, ~~wherever vehicle parking is necessary. The Council has prepared a~~ in line with the policy requirements and ~~having regard to the Council's 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. However in light of the climate emergency the use of car clubs and Ultra-Low Emission vehicles will need to be carefully managed. This is to ensure that car use is reduced and also recognising these types of vehicles involve embodied carbon emissions in their production.~~

TR5 Deliveries, servicing and construction

- A. Development proposals should facilitate sustainable freight, where possible, through water, rail, road and over the last mile, cargo bikes. They must also 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 approach, 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 approach and help to enable coordination and integration of servicing requirements across the site(s).

Explanation

~~42.27~~12.28. 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.

~~42.28~~12.29. 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.

~~42.29~~12.30. 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 and reducing road danger, with consequential benefits in terms of address traffic congestion, poor air quality and noise pollution.

~~42.30~~12.31. 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.

~~42.34~~12.32. Delivery and servicing requirements for new development needs to be considered at the early stage of the design-led approach. 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.

~~42.32-12.33.~~ 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. Walking 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

~~42.33-12.34.~~ 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).

~~42.34-12.35.~~ 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.~~12.36. 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.~~12.37. 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.~~12.38. 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. Proposals must demonstrate that the development will be 'connection-ready' on first occupation.
- C. Development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment locations. Proposals will be expected to have 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 road or walking route, 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

~~12.38-12.39.~~ 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.

~~12.39-12.40.~~ 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.

~~12.40-12.41.~~ 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.⁸⁷ 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, 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

~~12.41-12.42.~~ 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.

~~12.42-12.43.~~ 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 responds positively 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 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.

~~12.43-12.44.~~ 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.

~~12.44-12.45.~~ The Manual for Streets should be referred for guidance on appropriate residual distances where development is located on a main 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.

⁸⁷ London Connectivity, Greater London Authority. Data cited August 2019.
<https://maps.london.gov.uk/connectivity/>

~~12.45~~12.46. 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.

Part Three:

Lewisham's neighbourhoods and places

300

13 Lewisham's neighbourhoods and places

Figure 13.1: Character areas and neighbourhoods

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 supporting Good Growth. To achieve the Vision for Lewisham and secure the successful delivery of spatial strategy, new development must respect and contribute positively to Lewisham's local distinctiveness.
- 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 new development, this part of the Local Plan is organised around five character areas. These areas contain a number of neighbourhoods which together share similarities that distinguish them from other parts of the Borough.⁸⁸ This includes similarities in the prevailing urban form, historic character, topography, landscape and other features. Figure 13.1 illustrates the extent of the character areas and their 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, key (spatial) objectives 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

⁸⁸ 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.

- 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 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 neighbourhoods and 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. To help to facilitate Good Growth in Lewisham the Local Plan includes site allocation policies. These are detailed policies for strategic development sites that are critical to the delivery of the spatial strategy. The sites will play an important role in addressing the Borough’s needs for new housing, workspace and main town centre uses, along with supporting infrastructure (including community facilities, transport and green infrastructure).
- 13.9. Each site allocation includes information on the development capacity of a site for different types of land uses. The process for identifying sites and the methodology used for setting capacity figures are set out in the “Lewisham Local Plan: Site Allocations Background Paper” – this should be referred for further information. The site capacities are indicative only and should not be read prescriptively for the purpose of planning applications, where the optimal capacity of a site must be established on a case-by-case basis using the design-led approach, and having regard to relevant planning policies. Table 13.1 summarises the overall delivery outcomes expected by the site allocations, both borough-wide and by character area. This demonstrates that the Local Plan has identified sites with sufficient capacity to meet the Borough’s new housing target, as set by the London Plan (Intend to Publish version), as well as needs identified in our latest Employment Land and Retail Capacity Studies.⁸⁹

Table 13.1: Site allocations – indicative delivery outcomes			
Character area	Homes (net units)	Workspace (gross floorspace sqm)	Town centre uses (gross floorspace sqm)
Central	7,901	98,000	144,123

⁸⁹ For the South area, the housing capacity figures are set out as a range. This is owing to the significant uplift in development capacity that could be achieved on selected sites in Bell Green / Lower Sydenham through delivery of Phase 2 of the Bakerloo Line Extension.

North	12,497	56,918	121,726
East	1,298	5,074	12,045
South	2,288-4,521	21,488	38,679
West	1,049	197,882	328,006
Total	25,034-27,267	Net additional (excluding consented development) 38,327	Net additional (excluding consented development) 24,361

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 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 walking 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. Some key sites have recently been redeveloped to a high quality design standard, such as the Catford Stadium. 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 walking 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 vehicular traffic with a poor quality public realm, which inhibits movement by walking and cycling. The High Street is generally not well connected 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

- 14.5. By 2040 the linked but complementary town centres of Lewisham and Catford will evolve as vibrant hubs of commercial, cultural, civic and community activity. The character and role of the centres, and the A21 corridor that connects them, will be re-imagined by building on the area's many attributes and excellent transport links. The arrival of the Bakerloo line together with the modernisation of Lewisham interchange will open opportunities for everyone to benefit from.
- 14.6. New housing, including a high proportion of genuinely affordable housing, business space and jobs, and community facilities will be focussed along the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road), encompassing Lewisham and Catford town centres, as well as out-of-centre retail parks. The A21 will be transformed into a 'healthy street' that better connects neighbourhoods, with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. Lewisham major centre will become a highly accessible metropolitan centre of exceptional quality; its continued evolution supported by new transport infrastructure and the renewal of larger sites, including the shopping centre. The re-routing of the South Circular (A205) will enable the comprehensive regeneration of Catford major centre, with high quality public realm enhancing links to the stations and supporting its role as the Borough's main civic and cultural hub. Elsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.
- 14.7. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The river valley network will have greater prominence. Improvements to the environmental quality and amenity value of the Rivers Ravensbourne and Quaggy will be realised through their re-naturalisation, particularly around the key visitor destinations of Lewisham and Catford centres. Waterlink Way, running alongside the River Ravensbourne, will be enhanced, with breaks in the route repaired to form the central feature of a network of walking and cycle routes that link open and green spaces.

Figure 14.1: Central area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Bakerloo line extension and Lewisham interchange upgrade to improve transport accessibility within the Borough and to help unlock the development potential of the Opportunity Area.
2. Facilitate the renewal of Lewisham major centre into a well-connected modern metropolitan centre and employment hub, with a thriving market at its heart. Enhance routes and permeability within and through the centre by the redevelopment of strategic sites, including the shopping centre.
3. Secure the re-routing of the South Circular (A205) to enable the comprehensive regeneration of Catford major centre, and reinforce its role as the Borough's main civic and cultural hub.

4. Transform the A21 corridor into a 'healthy street' with public realm improvements that make walking, cycling and use of public transport safer and more convenient. Enhance the place qualities of the corridor by integrating new high quality housing development along it, and redeveloping out-of-centre retail parks and buildings for a wider mix of uses.
5. Reinforce and enhance the character of established residential areas, local centres and parades. At the same time, deliver new homes and area improvements through their sensitive intensification.
6. Protect and promote the renewal of industrial land at Bromley Road. Improve the quality of the townscape around Bellingham local centre, particularly at Randlesdown Road and Bellingham station approach.
7. Enhance the environmental quality and amenity value of the Ravensbourne and Quaggy Rivers. Improve public access to the rivers with new and improved routes, focussing on Waterlink Way.
8. Protect and enhance open and green spaces, including waterways. Deliver a connected network of high quality walking and cycle routes that link these spaces.

Figure 14.2: 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 Area⁹⁰ 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.

⁹⁰ Refers to the New Cross / Lewisham / Catford Opportunity Area, as established by draft London Plan policy SD1 (Opportunity Areas).

- B. Development proposals will be expected to facilitate growth and investment within the Central Area whilst enhancing its place qualities by supporting:
- 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 walking and cycle connections and routes that better link neighbourhoods and places, including green spaces, having regard to Policy LCA5 (Central Lewisham Links).
- D. Staplehurst Road 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 walking 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 respond positively 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 will 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 Design Guidance SPD (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 walking and cycle routes. Detailed site specific requirements are set out in the site allocation policies for the Central Area.
- C. Development proposals should respond positively 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 promote walking and cycling, and to make the town centre a significantly more accessible, safer and attractive environment. 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 responds positively 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. Proposals for the realignment of the South Circular (A205) will be progressed 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 respond positively 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 promote walking and cycling, and to make the town centre a significantly more accessible, safer and attractive environment. 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), and safe walking and cycling will be prioritised.
- F. Development proposals must respond positively 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 respond positively to the distinctive character of The Broadway, and the buildings of townscape merit that line it, and reinforce its function as a key movement corridor by walking and cycling, 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 neighbourhoods 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. Responding positively to the evolving urban character of the area, including through the sensitive intensification of strategic and other sites, having regard to the A21 Design Guidance 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 safe and convenient movement by walking and cycling, 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.

- 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:
 - 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 Central Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.

Lewisham's Central Area

- 14.8. Lewisham's Central Area features the linked but complementary major centres of Lewisham and Catford. These centres, together with the A21 road, make up a strategic corridor within the Borough. A London Plan Opportunity Area broadly covers the extent of this corridor. It is instrumental to the delivery of the spatial development strategy for London. To fully realise the growth potential of the Opportunity Area it is vital that the regeneration and renewal of the major centres is delivered and new strategic transport infrastructure is secured. The Local Plan sets out a strategy to ensure that growth and regeneration in the Central Area is effectively coordinated, with a clear framework in place to support the long-term vitality and viability of the town centres; also, to facilitate the Bakerloo line extension and upgrades to the Lewisham interchange, one of London's key strategic transport interchanges.

- 14.9. The regeneration and renewal of Lewisham major centre, enabling its transition to a metropolitan centre, is a key objective which is supported by the London Plan. A significant amount of investment has been directed to the town centre in recent years. This reflects the strong commitment by the Council, its key stakeholders and development industry partners to deliver a high quality, modern metropolitan

centre. A number of major schemes have planning consent with several having been completed, bringing a significant amount of new homes, business space and community facilities to the centre, together with public realm and environmental improvements. This includes the removal and reconfiguration of the gyratory at Lewisham Gateway and river restoration works. There remain opportunities for additional sites to come forward, whose development can enhance the function and place qualities of the centre. Clear development guidelines are needed to ensure a coordinated approach to site delivery. Lewisham Shopping Centre is noteworthy given its scale and prominent position at the heart of the centre. Its redevelopment is essential to improving accessibility and circulation within the centre as well as to enhance the amenity of Lewisham Market, an important visitor destination in its own right.

- 14.10. Catford major centre is the civic heart of the Borough where the Council's main offices are located. It contains a number of historic buildings, civic and cultural venues, such as Broadway Theatre, which give it a distinctive character and identity. The town centre has growing night time economy along with a range of shops and services, including the Catford Market, which cater to the daily needs of local residents. However, the centre suffers from areas of poorer quality public realm, particularly around the South Circular, which acts as a barrier to movement and segregates the centre from its surrounding neighbourhoods. The realignment of the road is critical to enable the comprehensive regeneration of the town centre. This will bring substantial public benefits including a significant amount of new housing and business space along with a revitalised centre. To help inform the Local Plan and ensure coordination in the delivery of strategic sites, the Council is preparing a masterplan for the centre.
- 14.11. An effective and resilient transport network is essential to the achievement of inclusive, healthy and liveable neighbourhoods. There are a number of strategic transport schemes within the Central Area which will help to support the levels of planned growth both in Lewisham and across London. This includes the Bakerloo line extension and the Lewisham station interchange. Along with securing these investments in public transport, the Local Plan seeks to deliver a well-integrated network of high quality walking and cycle routes. The main aim is to realise a significant shift in journeys made by vehicles to more sustainable modes. The transformation of the A21 Corridor into a Healthy Street underpins this approach. The A21 Corridor is the principal north-south route within Lewisham, linking the major centres of Lewisham and Catford as well as neighbourhoods further south along Bromley Road. It has significant potential for accommodating growth and improving connections between neighbourhoods and places, including open spaces such as Ladywell Fields, Lewisham Park and Mountsfield Park.
- 14.12. Transport for London have completed Outcome Definition along the A21, which has shown that significant improvements are needed to encourage a mode shift to cycling, walking and public transport use, including improved cycle infrastructure, bus priority measures and additional pedestrian crossings. Although this work is subject to Government funding, any developments or future plans in the area should support this. Providing clear connections and routes on side streets off the A21 will be key to ensure that the area can cope with the increased demand, and to improve the links between Lewisham and Catford.

- 14.13. The river corridor network is a defining feature of the Central Area, with the Rivers Ravensbourne and Quaggy traversing it. There are opportunities to improve the ecological and amenity value of the waterways, both by naturalising and enhancing public access to them. The comprehensive redevelopment of sites within and around Lewisham and Catford major centres have significant potential in this respect. The East Lewisham Links are centred on the network of green infrastructure, including waterways, recognising the priority given to improving public access to it, particularly by enhancing the Waterlink Way.

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the Central Area site allocations are included in a separate document.

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.
- 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 movement by walking and cycling.

- 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 evening and night-time 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 the Albany Theatre, Goldsmiths College and Trinity Laban Centre, 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

- 15.7. By 2040 the maritime and industrial heritage of the North area, linked to its unique position along the River Thames, will be celebrated as a vital focus for cultural activity and regeneration. The character and role of vacant and underused industrial sites around the Thames and Deptford Creek will be re-imagined to provide well integrated employment areas and mixed-use neighbourhoods. A new Creative Enterprise Zone will cement Lewisham's position as a leader in the creative and cultural industries and support an inclusive local economy. The arrival of the Bakerloo line, with a new station at New Cross, will also open opportunities for everyone to benefit from.
- 15.8. The regeneration of larger brownfield sites will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. New mixed-use areas will be created at Convoys Wharf, the Timber Yard at Deptford Wharf and Surrey Canal Triangle. These will be well integrated with existing neighbourhoods and communities, including housing estates, ensuring all local residents enjoy access to decent homes, high quality living environments and good job opportunities. The historic high streets at New Cross and Deptford district centres will remain at the heart of community activity, reflecting the area's culture and diversity. The centres will form an integral part of the Creative Enterprise Zone (CEZ) featuring modern and affordable workspace, including artists' studio space, building on the presence of world renowned institutions such as Goldsmiths College, Trinity Laban Centre and the Albany Theatre. New workspace will be delivered through the renewal of industrial land, including sites around Surrey Canal Road and Deptford Creekside.

- 15.9. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The riverfront will be transformed into an attractive leisure destination that is well connected to its surrounding neighbourhoods. Enhancements to Waterlink Way at Deptford Creekside will also provide for improved access to the river valley corridor. A network of walking and cycle routes will enhance connections within and beyond the area, with Folkestone Gardens a focal point for linking key radial routes, including the route of the former Grand Surrey Canal. New Cross Road (A2) will also be transformed into a 'healthy street', with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient, particularly around New Cross and New Cross Gate stations.

Figure 15.1: North Area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Bakerloo line extension, with a new modern station at New Cross, to improve transport accessibility and to help unlock the development potential of the Opportunity Area.
2. Continue to deliver modern business space through the regeneration of larger vacant and underused industrial sites, such as Convoys Wharf, Timber Yard at Deptford Wharf and Surrey Canal Triangle. Create new high quality, residential and mixed-use areas that are well integrated with existing neighbourhoods and communities, including the Pepys Estate.
3. Secure the future of Millwall Football Club in the Borough with a modern stadium as part of a new leisure and community destination, supported by a new Overground station.
4. Protect and enable the renewal of industrial land at Surrey Canal Road. Re-configure Strategic Industrial Land to create a high quality mixed-used, employment quarter at the edges of Deptford Park and Folkstone Gardens, with an improved transition between residential and industrial uses in the area.
5. Create new opportunities for business by making better use of land around railways, including railway arches and the 'Bermondsey Dive Under'.
6. Establish a Creative Enterprise Zone to cement Lewisham's position as one of London's leaders in the creative, cultural and digital industries. Support and grow these industries through the renewal of industrial sites at Deptford Creekside Cultural Quarter, along with new workspace and artists' studio space elsewhere. Build on the presence of world renowned institutions, such as Goldsmiths College, Trinity Laban Centre and Albany Theatre.
7. Deliver heritage-led regeneration schemes to preserve and enhance Lewisham's industrial and maritime heritage, as well as the character and cultural identity of historic high streets at Deptford and New Cross. Ensure Deptford market remains a vibrant hub at the heart of the community.
8. Transform New Cross Road (A2) into a 'healthy street' with public realm improvements that make walking, cycling and use of public transport safer and more

convenient. Secure the removal of the Amersham Gyratory. Create a lively and continuous frontage along New Cross Road by repairing breaks in the townscape, such as through infill development and introducing active uses at the street level.

9. Maximise the recreational and amenity value of the River Thames and Deptford Creekside by transforming the riverside area into a vibrant neighbourhood and visitor destination. Enhance public access to the river, including by repairing breaks in the Thames Path and Waterlink Way, as well as enabling river bus services at Convoys Wharf.
10. Protect and enhance open and green spaces, including waterways. Continue to deliver and expand the North Lewisham Links, a connected network of high quality walking and cycle routes that link these spaces. Ensure these routes address existing barriers to movement, such as those caused by the tangle of railways and major roads.
11. Safeguard strategic waste management sites, including South East London Combined Heat and Power (SELCHP), and develop decentralised energy networks linked to this facility.

Figure 15.2: 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 Area⁹¹ 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;
 - 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

⁹¹ Refers to the New Cross / Lewisham / Catford and Deptford Creek / Greenwich Riverside Opportunity Areas, as established by draft London Plan policy SD1 (Opportunity Areas).

- 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 walking and cycle 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 walking 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 and across 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 approach. 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 respond positively 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 respond positively 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 (2020); 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. Responding positively 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 by walking and cycling, 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 movement by walking and cycling, 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).

Figure 15.3: Creative Enterprise Zone

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:
 - a. The regeneration of Mixed-use Employment Land;
 - b. Retaining and enhancing workspace provision at Deptford Creekside;
 - c. Focused renewal of industrial sites located at the convergence of Grinstead and Trundleys Roads to establish a revitalised employment-led mixed-use quarter; and
 - d. 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:
 - a. 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;
 - b. Ensuring new development proposals are designed to enable full-fibre, or equivalent infrastructure, connectivity to all end users;
 - c. Encouraging the temporary use of vacant buildings and sites for creative workspace and cultural activities; and
 - d. 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:
 - a. 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; or
 - b. Within a Mixed-use Employment Location, seek to maximise the provision of B1 Use Class workspace for uses in the creative and cultural industries, and demonstrate that reasonable efforts have been made to retain or re-provide such existing provision; and
 - c. Include an element of affordable workspace, in line with Policy EC4 (Providing suitable business space and affordable workspace).

Figure 15.4: Thames Policy Area

LNA4 Thames Policy Area and Deptford Creekside

- A. Development proposals must respond positively 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 approach. 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 walking 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.

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.
- 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 Parks and Open Spaces Strategy.

Lewisham's North Area

- 15.10. Lewisham's North Area has a key role to play in accommodating growth and supporting our regeneration objectives. A large part of the area falls within a London Plan Opportunity Area. It is instrumental to the delivery of the spatial development strategy for London. There are pockets of deprivation in localities across the North Area. Targeted interventions are required to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation. The Local Plan sets out a strategy to ensure that growth and regeneration in the North Area is effectively coordinated, with a clear framework in place to facilitate the Bakerloo line extension. It requires that new development is well integrated with existing neighbourhoods and communities, and maximises opportunities to deliver area improvements and transformational change for the benefit of everyone.
- 15.11. Mixed-use Employment Locations present the main opportunities for accommodating growth and securing new investment in the North Area. MELs are, for the most part, underused and vacant industrial sites. They are the Borough's largest reservoir of brownfield land suitable for redevelopment and include, for instance, the Convoys Wharf and Surrey Canal Triangle sites. The strategic approach for MELs was established by the Core Strategy. There are now a number of MELs with planning consent for mixed-use development and some sites have started to come forward. We will continue to support the comprehensive regeneration and renewal of MELs in order to improve the environmental quality of the North Area and to deliver significant amounts of new housing, workspace, community facilities and public realm improvements, including new open and green space. Site allocations have been included in the plan to ensure certainty over the delivery of MELs. Guidance has also been prepared to support the Local Plan policies and provide clarity for the public over development opportunities and outcomes sought, including the Surrey Canal Triangle SPD and New Cross Area Framework.
- 15.12. The Local Plan designates a new Creative Enterprise Zone for North Lewisham. This is one of the first CEZs in the Capital and is backed by the Mayor of London.

It reflects the strength of our cultural, creative and digital industries and their rapid growth in the Borough in recent years. The Local Plan aims to enable the conditions for these sectors to continue to prosper over the long-term. This includes a positive and proactive approach to managing industrial land in the North Area to intensify employment sites and secure the delivery of new high quality workspace, including affordable workspace. This approach is complemented by other measures targeted at boosting these employment sectors. They include the designation of Cultural Quarters at Deptford Creekside and New Cross as well as Night-time Economy Hubs. These other measures aim to build on the diversity and strengths of the area's historic high streets and their surrounds, as well its cultural assets and education institutions.

- 15.13. Lewisham is in many ways defined by its connection to waterways, particularly the River Thames and its tributaries. The Thames Policy Area is designated in the Local Plan. It requires that careful consideration is given to the character, amenity value and environmental quality of the River Thames and Deptford Creekside, along with the strategic function of the waterway network, including for passenger travel. The river network also has an important role in shaping Lewisham's identity and character. The Borough has a strong maritime and industrial heritage, including the Royal Naval Dockyard and the Grand Surrey Canal, and there are opportunities for heritage-led regeneration.
- 15.14. An effective and resilient transport network is essential to the achievement of inclusive, healthy and liveable neighbourhoods. There are a number of strategic transport schemes within the North Area which will help to support the levels of planned growth both in Lewisham and across London. This includes the Bakerloo line extension, including a new station at New Cross Gate, along with a new station at Surrey Canal Road serving the East London Line (London Overground). Along with securing these investments in public transport, the Local Plan seeks to deliver a well-integrated network of high quality walking and cycle routes. The main aim is to realise a significant shift in journeys made by vehicles to more sustainable modes. The transformation of New Cross Road / A2 Corridor into a Healthy Street underpins this approach. New Cross Road is a prominent east-west route within the area linking important visitor destinations. It has significant potential for improving connections between neighbourhoods and places, along with site development opportunities to help enable public realm enhancements.
- 15.15. Elsewhere, the North Lewisham Links programme has been successfully delivered in key locations in the area, helping to improve accessibility to green spaces and other amenities. We will continue to support the delivery of these vital walking and cycling routes. The early success of this project has set a model for public realm enhancements in the Borough. The 'links' concept will therefore be extended to Lewisham's other character areas, so to create a borough-wide network of linked routes.

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the North Area site allocations are included in a separate document.

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 20th 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 and night-time 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. 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 Burnt Ash Road, although these routes are dominated by vehicular traffic and have a generally poorer public realm, limiting opportunities for movement by walking and cycling. 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 abundance of high quality parks and green spaces in the East area will make it a distinctive part of Lewisham. This includes the open expanses of Blackheath which provide the setting for the Maritime Greenwich World Heritage Site and the village character of Blackheath district centre. These assets will help to strengthen the area's visitor economy, making it a key destination in London. The character and role of the town centres that formed along the historic route to Blackheath, including Grove Park and Lee Green, will be re-examined to ensure they remain thriving and vital hubs of community and business activity. Improved links across major roads and railways will enhance movement between town centres and green spaces, opening opportunities for everyone to benefit from.
- 16.7. The revitalisation of the area's town and local centres will ensure they remain thriving hubs of community and commercial activity as well as focal points for new housing, including a high proportion of genuinely affordable housing. The redevelopment of Leegate Shopping Centre will act as a catalyst for the renewal of Lee Green district centre, making it a vibrant, more welcoming and accessible place. The centre will feature enhanced gateways, aided by the transformation of Lee High Road (A20) into a 'healthy street', with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. The local centres of Burnt Ash, Staplehurst Road and Grove Park will play an integral role in supporting their neighbourhoods. New development will deliver public realm and access improvements, enhancing the station approaches, making the centres more attractive for visitors and businesses. Blackheath Village district centre will build on its unique qualities as a visitor destination with a vibrant night time economy. Elsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.
- 16.8. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. The area's linear network of green infrastructure, which spans from the riverside and Blackheath in the north to Chinbrook Meadows in the south, will remain one of its predominant features. This will be celebrated by the distinction of an 'urban national park' in Grove Park, along with the open spaces at Blackheath. A network of walking and cycle routes, including the Green Chain Walk, will link open and green spaces both within and outside of the borough.

Figure 16.1: Eastern sub area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Re-establish Lee Green district centre as a welcoming and thriving hub of commercial and community activity. Deliver public realm improvements and high quality, mixed-use developments through the renewal of Leegate Shopping Centre and other town centre sites. Address the dominance of vehicular traffic at the centre's main junction.
2. Preserve and enhance the distinctive qualities of Blackheath Village district centre whilst building on its strengths as a key visitor destination.

3. Reinforce the role of Grove Park local centre in supporting the neighbourhood. Improve the quality of the townscape and environment through the redevelopment of larger sites within the centre.
4. Strengthen the role of Burnt Ash local centre in supporting the neighbourhood. Improve the quality of the townscape around Lee Station, and the station approach, through the renewal of sites within and around Chiltonian Industrial Estate.
5. Protect and enable the renewal of industrial land at Blackheath Hill and other smaller industrial sites, with the delivery of new employment-led mixed-use development.
6. Transform the South Circular (A205, Baring Road) and Lee High Road (A20) into 'healthy streets' with public realm improvements that make walking, cycling and use of public transport safer and more convenient.
7. Preserve the Outstanding Universal Value of the Maritime Greenwich World Heritage Site Buffer Zone at Blackheath, along with protecting strategic views to and from it.
8. Protect and enhance the linear network of open and green spaces, along with improving public access to them.
9. Deliver a connected network of high quality walking and cycle routes that link open and green spaces, taking advantage of the Green Chain Walk. Ensure these routes address existing barriers to movement, such as those caused by railways and major roads.
10. Enhance the environmental quality and amenity value of the River Quaggy by re-naturalising the river near Lee High Road.

Figure 16.2: 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:
 - a. 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);
 - b. The renewal of sites at Grove Park and Staplehurst Road local centres and their surrounds, including the station approaches, is facilitated to support the long-term vitality and viability of the centres;
 - c. Burnt Ash local centre plays a more prominent role in supporting the local area with provision of modern workspace, services and community facilities;
 - d. New employment development is concentrated within town centres and the Locally Significant Industrial Sites at Blackheath Hill and Manor Lane; and
 - 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 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 respond positively 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, evening 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 walking 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 walking 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 responds positively to their distinctive local character, including the landscape setting. The Council will prepare a Small Sites Guidance SPD 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 respond positively 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 walking and cycle 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 respond positively 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 Guidance 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 responds positively 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, Sainsbury's Lee Green and the land at Lee High Road and Lee Road, which together form a central focus for renewal.
- C. Development proposals must contribute to enhancing the public realm in order to promote walking and cycling, and to make the town centre a significantly more accessible, safer and attractive environment. 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 respond positively 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 respond positively 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 walking 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.
- 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 Parks and Open Spaces Strategy.

Lewisham's East Area

- 16.9. Lewisham's East Area is largely made up of the historic villages that formed along the route to Greenwich. These greatly influenced the area's development and the predominantly suburban character that persists today. The East Area will play a more complementary role in accommodating the Borough's future growth. This is owing to its expansive historic and natural environments along with the scarcity of large development sites. Together these factors limit opportunities for bringing forward substantial new development. Yet generating investment to improve the quality of neighbourhoods and opportunities for local people remains a priority. This is particularly in the Borough's Area for Regeneration, which extends to parts of Grove Park, where interventions are required to address the causes of deprivation. The Local Plan sets out a strategy to help facilitate new investment within the East Area, maximising opportunities that are available whilst ensuring growth is effectively coordinated, with a clear framework that responds to the area's valued built and natural assets. This includes Blackheath and the Maritime Greenwich World Heritage Site Buffer Zone.
- 16.10. Town and local centres present the main opportunities for accommodating growth and securing new investment. The East Area's strategic development sites are generally located within or around these centres. There is significant potential to reinforce the role of Lee Green District Centre through targeted renewal. It contains a number of sites, including the Leegate Shopping Centre, whose comprehensive redevelopment will significantly enhance the place qualities of the centre whilst delivering new housing, improved retail provision and community facilities. There are also a number of local centres that play a vital role as community hubs serving the area's neighbourhoods, and where new development can help to support their long-term vitality and viability. This includes Grove Park, Burnt Ash and Staplehurst Road. Blackheath Village is an important visitor destination whose strategic role as a Night Time Economy hub is supported through the plan.
- 16.11. To make the best use of land and maximise opportunities for new investment in the East Area, the Local Plan seeks to facilitate the intensification of its neighbourhoods. The development of small housing sites provides a key means to realise the sensitive intensification of established residential areas. The Lewisham Characterisation Study (2019) has informed this approach and is useful in indicating where there is such scope in the East Area. We will prepare a Supplementary Planning Document to identify opportunities and to help ensure that all such development responds positively to its local context. Intensification of

employment land is also promoted, particularly to deliver new workspace and secure the long-term viability of employment sites. Site intensification will be delivered primarily through the co-location of employment and other compatible uses on LSIS at Blackheath Hill and Manor Lane.

- 16.12. The Local Plan seeks to deliver a well-integrated network of high quality walking and cycle routes. The main aim is to realise a significant shift in journeys made by vehicles to more sustainable modes. The transformation of the South Circular (A205, Baring Road) and Lee High Road (A20) into Healthy Streets underpins this approach. These are principal movement corridors within the East Area, and have potential for accommodating growth and improving connections between neighbourhoods and places.
- 16.13. The linear network of green infrastructure is a defining feature of the Blackheath, Lee and Grove Park neighbourhoods and contributes to the East Area's distinctiveness. The network includes an expansive series of open spaces and parks, nature conservation sites and the river corridor, along with walking and cycle routes that are of strategic importance, including the Green Chain Walk. It is imperative that the environmental and place qualities of this network of green infrastructure are protected and enhanced. The Local Plan sets the strategic priorities for the network which community groups, including neighbourhood forums, are encouraged to support, whether through community projects or neighbourhood plans. The East Lewisham Links are centred on the network of green infrastructure, recognising the priority given to improving public access to it, particularly by walking and cycling.

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the East Area site allocations are included in a separate document.

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 out of the area to access key services and jobs. The area has a relatively low population

density and has not benefitted from the same level of outside 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 the distinctive character of the South area, derived from its open spaces, river valleys and garden city / cottage estates, will be celebrated and reinforced. These assets and features will provide the wider setting for regeneration, building on new and improved transport links, including the Bakerloo line extension. The role and character of large tracts of commercial land in Bell Green and Lower Sydenham, along with the major roads that adjoin them, will be re-imagined to provide a high quality, mixed-use neighbourhood. This new focus for community activity in Lewisham will act as a catalyst for growth and investment. Stakeholders will work together and alongside communities to deliver improvements that address the causes of deprivation in the Borough's south, opening opportunities for everyone to benefit from.
- 17.7. The regeneration of brownfield sites in Bell Green and Lower Sydenham will deliver a significant amount of new housing, including a high proportion of genuinely affordable housing, workspace and jobs, community facilities and open space. A new mixed-use neighbourhood will be created through the redevelopment of out-of-centre retail buildings, the former gasholders, industrial land around Stanton Way and other sites. This will be coordinated by a masterplan, informed by the local community, ensuring the area is well integrated with existing neighbourhoods and communities. The garden city / cottage character of neighbourhoods in Bellingham and Downham will be reinforced, with their sensitive intensification providing for area improvements, helping to ensure people have access to high quality housing and living environments.

- 17.8. The A21 (Bromley Road) and Ringway (Southend Lane and Whitefoot Lane) will be transformed into 'healthy streets' that better connect neighbourhoods, with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. Along these corridors, opportunities will be taken to renew land and underused sites to create new homes, jobs and community facilities. New development within and around the town and local centres along the corridors, such as Downham district centre and Southend Village, will help them to become more thriving and vibrant places.
- 17.9. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. Beckenham Place Park will evolve as one of the Borough's most important green spaces and a key visitor destination in south London. The river valley network will have greater prominence. Improvements to the environmental quality and amenity value of the Ravensbourne and Pool rivers will be realised through their re-naturalisation. Waterlink Way and the Pool River Linear Walk, along with the Green Chain Walk, will be enhanced to form key features of a network of walking and cycle routes that link open and green spaces both within and outside of the Borough.

Figure 17.1: South area

Key spatial objectives

To achieve this vision our key spatial objectives are to:

1. Secure the delivery the Bakerloo line extension and other infrastructure to significantly improve transport accessibility, address existing barriers to access and unlock the area's development potential.
2. Coordinate new investment in the Bell Green and Lower Sydenham area to enable it to become a London Plan Opportunity Area.
3. Deliver the regeneration of the former gasholders, Bell Green Retail Park and other sites nearby to create a new high quality residential-led mixed-use area that is well integrated with existing neighbourhoods and communities. Preserve and enhance the heritage value of the Livesey Memorial Hall and Gardens.
4. Develop decentralised energy networks, taking advantage of opportunities presented by the redevelopment of larger sites around Bell Green / Lower Sydenham.
5. Create a high quality mixed-used, employment led quarter through the renewal of industrial land at Stanton Way and Worsley Bridge Road.
6. Transform the Ringway corridor (Southend Lane and Whitefoot Lane) and the A21 corridor (Bromley Road) into 'healthy streets' with public realm improvements that make walking, cycling and use of public transport safer and more convenient. Address severance caused by the Bell Green gyratory.
7. Enhance the place qualities of the Ringway and A21 corridors by integrating new high quality housing development and revitalising centres along it, particularly to secure the long term viability of Downham district centre.
8. Reinstate and enhance the historic character and identity of Southend Village and its surrounds, building on the presence of local assets including the Green Man centre

and Peter Pan pond and through the redevelopment of the out-of-centre retail (Homebase) site.

9. Maintain the 'garden city' and cottage estate character of residential areas in Bellingham and Downham. At the same time, attract investment and deliver new homes through their sensitive intensification.
10. Support balanced neighbourhoods and communities by effectively managing Houses in Multiple Occupation and preventing against their overconcentration.
11. Protect and enhance open and green spaces, including by expanding the role of Beckenham Place Park as a key visitor destination. Deliver a connected network of high quality walking and cycle routes that link these spaces, taking advantage of the Green Chain Walk.
12. Enhance the environmental quality and amenity value of the Ravensbourne and Pool Rivers. Improve public access to the rivers with new and improved routes, focussing on Waterlink Way and the Pool River Linear Park.

Figure 17.2: 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:
 - a. 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 neighbourhood that is well-integrated with its surrounding neighbourhoods;
 - b. 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;
 - c. 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;
 - d. New employment development is concentrated within town centres and Locally Significant Industrial Sites;
 - e. 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;
 - f. 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 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 respond positively 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 responds positively 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 Sites Guidance SPD, which development proposals must have regard to.
- F. Development proposals should respond positively 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 walking 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 walking and cycle 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 respond positively 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 Design Guidance SPD (forthcoming);
 - e. Bell Green and Lower Sydenham Area Masterplan and/or SPD (forthcoming);
 - f. Small Sites Guidance SPD (forthcoming); and
 - g. River Corridor Improvement Plan SPD (2015).

Figure 17.3: Strategic Area for Regeneration

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 walking 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 Masterplan. 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, Bell Green Retail Park; and Sainsbury's Bell Green;
 - 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 walking 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 walking and cycle 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. Responding positively 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.
- E. Through the preparation of the Local Plan, consideration will be given to the designation of a new town centre in the Bell Green and Lower Sydenham area. This centre will support the new mixed-use neighbourhood to be delivered through the comprehensive regeneration of sites, and reconfiguration of existing out-of-centre retail provision. The centre's role and function (i.e. position within the Borough's town centre hierarchy) will be established having regard to further detailed assessments and public consultation.

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. Responding positively to the evolving urban character of the area, including through the sensitive intensification of strategic and other sites, having regard to the A21 Design Guidance 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 respond positively 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 walking 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 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 safe and convenient movement by walking and cycling, 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-D.** 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.
- B-E.** 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.F. To support the effective implementation of the South Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.

Lewisham's South Area

- 17.10. Lewisham's South Area will play an important role in helping to deliver more inclusive, healthier and liveable neighbourhoods in the Borough. It has the potential to accommodate a significant amount of growth over the plan period. However, the level of this growth will be contingent on the delivery of strategic infrastructure necessary to support both new developments and existing neighbourhoods. This includes transport infrastructure and particularly the Bakerloo line extension. The South Area does not benefit from the same levels of good public transport accessibility as many other parts of the Borough. This is one of the key factors contributing to the deprivation experienced locally and the need to designate a Strategic Area for Regeneration. Targeted interventions are required to tackle inequalities and the social, economic and environmental barriers that contribute to deprivation. The Local Plan sets out a strategy to ensure that growth and regeneration in the South Area is effectively coordinated, with a clear framework in place to facilitate the Bakerloo line extension to Hayes. It requires that stakeholders work together and alongside local communities to tackle deprivation by directing investment in a joined up way. The phasing of new development of strategic sites will be critical to delivering area improvements and transformational change for the benefit of everyone. This is recognising the Bakerloo line extension will open new possibilities for optimising the capacity of sites.
- 17.11. The Bell Green and Lower Sydenham area is poised to become one of London's next Opportunity Areas. There are a number of large strategic sites in proximity to one another with the potential to be comprehensively redeveloped. They include the former Bell Green Gas Holders, an out-of-centre retail park and buildings, and several designated employment locations. The Local Plan establishes the principles for their regeneration and renewal. However, a more detailed framework will be prepared to ensure coordination between landowners in the delivery of a new high quality, residential-led mixed-use neighbourhood. This will be led by the Council working in collaboration with local communities and key stakeholders. Particular consideration will need to be given to the area's relationship with and connections to Sydenham District Centre. The long-term vitality and viability of the town centre can be aided by improved linkages and a critical mass of new residents/visitors in the south of the Borough.

- 17.12. Through the preparation of the Local Plan, consideration will be given to the designation of a new town centre in the Bell Green and Lower Sydenham area. The role and function of this centre (i.e. position in the town centre hierarchy) will be established through further detailed assessments, including on the impact on the viability of existing centres, and informed by public consultation. There is potential scope to designate a new District or Local Centre to support the levels of growth planned in the area.
- 17.13. The South Area derives much of its character from the interwar homes constructed by the London County Council, particularly in Bellingham and Downham. The housing estates were influenced by 'garden city' principles and provide for a distinctive but relatively homogenous pattern of lower density development. These neighbourhoods experience some of the highest levels of deprivation in Lewisham. Many localities are within the 20 per cent most deprived in the country. Investment is needed to address inequalities and the causes of deprivation. Given the character of the established residential neighbourhoods and the scarcity of large sites suitable for redevelopment, a more tailored approach to investment is required. Area improvements will be generated mainly through the sensitive intensification of existing neighbourhoods. We will prepare a Supplementary Planning Document to identify opportunities and to help ensure that all such development responds positively to its local context.
- 17.14. The Local Plan seeks to deliver a well-integrated network of high quality walking and cycle routes that link to public transport nodes. The main aim is to realise a significant reduction in journeys made by cars to more sustainable modes. The transformation of the A21 (Bromley Road) and Southend Lane into Healthy Streets underpins this approach. These are principal movement corridors within the South Area, and have potential for accommodating growth and improving connections between neighbourhoods and places. Focussed investment will also help to support the vitality and viability of centres along or in proximity to the routes, including Downham District Centre, Southend Village and Bellingham Local Centre. Regeneration of Bell Green and Lower Sydenham presents opportunities to improve the environment for walking and cycling, particularly at major road junctions, including at Southend Lane.
- 17.15. The South Area's network of green infrastructure includes parks, open spaces and waterways. Beckenham Place Park is the Borough's largest green space, featuring much ancient woodland, and is an important local asset. A significant amount of investment has been delivered here in recent years and the park will play an increasingly important role as a local and wider regional visitor destination. The river valley network is also a defining feature of the area, with the Ravensbourne and Pool Rivers traversing it. Opportunities must be taken to re-naturalise the rivers wherever opportunities arise, particularly to improve their ecological and amenity value. The South Lewisham Links are centred on the network of green infrastructure, recognising the priority given to improving public access to it by walking and cycling. We will work with other local authorities, including Bromley, to investigate opportunities to improve connections from the South Area to green spaces outside of Lewisham.

Site Allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the South Area site allocations are included in a separate document.

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. These largely make up 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 walking 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 20th century infill. The sub-area contains many conservation areas and listed buildings, which strongly inform the character of the area.
- 18.4. The area contains the district centres of Sydenham and Forest Hill that have a diverse town centre offer and serve the wider neighbourhood, along with complementary local centres. . Some town centres (such as Ladywell) contain vacant and underused sites, and have a poorer 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 College and Southwark College. The West Area contains the Horniman Museum which is a significant cultural destination within London and the southeast.
- 18.5. There character area has a number of key train stations and transport corridors, including the B218 Brockley Road/Brockley Rise and the A205 South Circular. The public realm is generally of a poorer quality, and roads are dominated by vehicles, inhibiting movement by walking and cycling. Whilst many train station are well positioned and in accessible locations, 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 historic fabric, landscape and woodland character of the West area will be reinforced so that its neighbourhoods and centres retain their village qualities, including valued views towards London and Kent. The area will feature a distinctive, thriving and well-connected network of town and local centres that complement one another. The character and role of the main routes along which centres and train stations are located, including Brockley Rise / Brockley Road (B218), will be re-examined to enhance links between them. The delivery of the Brockley station interchange and other transport improvements will enhance access to central London, opening opportunities for everyone to benefit from.

- 18.7. The revitalisation of the area's town and local centres will ensure they remain thriving hubs of community and commercial activity, as well as focal points for new housing, including a high proportion of genuinely affordable housing. Public realm enhancements at the main entrances to the centres, as well as at their stations and approaches, will make them more accessible and inviting places. Forest Hill district centre will evolve as a key employment location and lively Cultural Quarter, building on the presence of the Horniman Museum and Gardens and studios at Havelock Walk. New workspace will be delivered through the renewal of industrial sites within and around the centres, particularly at Forest Hill and Upper Sydenham / Kirkdale. The B218 and South Circular (A205) will be transformed into 'healthy streets', with public realm enhancements that make walking, cycling and the use of public transport safer and more convenient. Elsewhere, the character of established residential areas will be reinforced, with their sensitive intensification providing for improvements throughout the wider area.
- 18.8. Residents and visitors will benefit from excellent access to high quality parks, open and green spaces. Many of these spaces will feature extensive views across Lewisham as well as natural woodland, the remnants of the Great North Wood. The river valley will have greater prominence with the River Ravensbourne better revealed around Ladywell. A network of walking and cycle routes will link open and green spaces both within and outside of the Borough.

Figure 18.1: West area

Key spatial objectives

To achieve the vision our key spatial objectives are to:

1. Secure the delivery of the Brockley station interchange to improve transport accessibility and support growth.
2. Secure the long-term vitality and viability of the area's network of town and local centres, and enhance connections between them. Ensure the centres retain their distinctive character and complement each other with a unique offer of services and facilities.
3. Reinforce the role of Sydenham district centre in supporting the neighbourhood. Deliver public realm improvements at key arrival points to make the centre a more accessible and welcoming place. Support new high quality development, including mixed-use development, on sites which detract from the distinctive character of the centre.
4. Expand the role of Forest Hill district centre as hub of community, commercial and cultural activity and employment location. Establish a new Cultural Quarter in the area, building on the presence of the Horniman Museum and Gardens and the cluster of creative industries at Havelock Walk and 118 Stansted Road.
5. Strengthen the role of Upper Sydenham / Kirkdale local centre in supporting the neighbourhood. Deliver the renewal of industrial land at Willow Way to better complement the centre with new workspace and a wider mix of uses, along with improvements to the townscape and public realm.

6. Enable the delivery of new workspace and housing along with enhancements to the Forest Hill station approach through the renewal of industrial land at Perry Vale and Clyde Vale, as well as the redevelopment of sites around the station.
7. Protect and enhance the employment quarter at Malham Road, including by extending the employment area to include units at 118 Stanstead Road.
8. Transform the South Circular (A205) and Brockley Rise / Brockley Road (B218) into 'healthy streets' with public realm improvements that make walking, cycling and use of public transport safer and more convenient.
9. Protect and enhance open and green spaces, along with the distinctive woodland character of the area. Deliver a connected network of high quality walking and cycle routes that link these spaces.

Figure 18.2: 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 respond positively 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/Kirkdale 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 responds positively to their distinctive local character, including the landscape setting. The Council will prepare a Small Sites Guidance SPD, which development proposals should have regard to.
- F. Development proposals should help to ensure the West Area benefits from a high quality network of walking and cycle 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 respond positively 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 respond positively 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 movement by walking and cycling 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/Kirkdale 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/Kirkdale 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 responding positively 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 responding positively to its historic character;
 - b. Seeking to alleviate vehicle congestion by improve the walking 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 responding positively 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 responds positively 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. Respond positively 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 promote walking and cycling, as well as to make the town centre a significantly more accessible, safer and attractive environment. 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 walking 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 respond positively 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.
- 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:
 - 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 West Lewisham Links, development proposals will be expected to have regard to the Council's Parks and Open Spaces Strategy.

Lewisham's West Area

- 18.9. Lewisham's West Area is characterised by the remnants of the Great North Wood along with its development as a series of older villages on a north-south spine which have grown around railway stations. The West Area will play a more complementary role in accommodating the Borough's future growth. This is owing to its expansive historic and natural environments along with the scarcity of large development sites. Together these factors limit opportunities for bringing forward substantial new development. The area's topography is another consideration. Its position at high ground, providing views towards London and Kent as well as to local landmarks, contributes to local character but also constrains certain types of development, such as tall buildings. Yet there remains a need to deliver new development in order to improve the liveability of the area's neighbourhoods as well as the viability of its centres and other employment locations. The Local Plan sets out a strategy to help facilitate new investment within the West Area, maximising opportunities that are available whilst ensuring growth is effectively coordinated, with a clear framework that responds to the area's valued built and natural assets, including its topography.

- 18.10. The West Area's network of town and local centres is one of its defining features. It also presents some of the main opportunities for accommodating growth. A key strategic priority is to secure the long-term viability and vitality of these centres by improving their place qualities, also responding to their position near stations and other transport routes. This can be achieved by facilitating new investment within the centres and enhancing connections between them. Public realm enhancements along the B218, Stanstead Road (South Circular) and other key routes, transforming them into Healthy Streets, is necessary to support safe and convenient movement by walking and cycling, and to help make travel by public transport more efficient. The sensitive intensification of these strategic movement corridors will therefore be supported as a means to secure new investment. It is imperative that the town centres retain their distinctive qualities and maintain a complementary offer of retail provision, services and community facilities. Most of the area's strategic site allocations are located within or around the centres, particularly the District Centres of Forest Hill and Sydenham as well as the local centres of Brockley and Upper Sydenham / Kirkdale. The redevelopment of these sites will help to stimulate new investment locally.
- 18.11. The continued evolution of Forest Hill District Centre into a thriving community, commercial and cultural hub is an important aspect of the spatial strategy for the Borough. The Local Plan seeks to build on the existing strengths of the centre as a key visitor destination. This includes taking advantage of its position as a gateway to the Horniman Museum and Gardens, and ensuring the centre is supported by a wide range of daytime and night time activities. Havelock Walk and 118 Stansted Road are unique commercial locations with a mix of cultural and creative industries. Their presence and value is recognised through the designation of the Forest Hill Cultural Quarter. Live-work accommodation has been successfully integrated at Havelock Walk, and is the only location in the Borough where this development typology is supported. Whilst the District Centre is well served by public transport its amenity is adversely impacted by the South Circular. We will therefore work with key stakeholders, including Transport for London and Network Rail, to secure the delivery of public realm enhancements wherever feasible. This may include, for instance, improvements to road crossings, and the station approach.
- 18.12. There are a number of employment sites in close proximity to the town centres that make an important contribution to the local economy. The renewal of these sites will be encouraged in order to deliver new modern workspace and jobs, as well as to improve the relationship between commercial and other neighbouring uses. In selected Locally Significant Industrial Sites, the co-location of commercial and other complementary uses will be supported. This includes sites in Forest Hill as well as Upper Sydenham / Kirkdale, near Willow Way.
- 18.13. The West Area was once covered by the Great North Wood, which extended from New Cross to Croydon south of the Borough. Much of the woodland was lost by the 18th century, but a strong woodland character prevails with the abundance of large mature street and garden trees, nature reserves along the railway lines, and allotments and other green spaces. The West Lewisham Links are centred on the network of green infrastructure and other valued places, recognising the priority given to improving public access to them by walking and cycling.

Site allocations

Note: For the text only version of the Local Plan: Main Issues and Preferred Approaches document, the West Area site allocations are included in a separate document.

Part Four:

Delivery and monitoring

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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
 - Sustainable transport and Healthy Streets
 - 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.
- 19.13. The draft London Plan sets out that planning contributions towards affordable housing and transport infrastructure share the equal highest priority, and this will be a key consideration where there is a need to prioritise contributions owing to reasons of financial viability of a development.

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 responds positively 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

- 19.14. 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.
- 19.15. 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).

19.16. 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

19.17. 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.

19.18. 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.

EC 22-DM5 Meanwhile uses

- A. Development pProposals for the meanwhile (temporary) use of vacant sites land or buildings 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; or
 - c. Is located on land within a consented major development scheme, which is being delivered in phases; and
 - d. 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. Development pProposals for the meanwhile (temporary) use of vacant land and buildings outside of within 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. must not adversely impact on the viability of the town centre or function of the employment area in supporting commercial uses and activities.

Explanation

19.19. Vacant premises buildings and sites can have a detrimental impact on the vitality and viability of places commercial and other areas. 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 that the optimise the use of land is made in the Borough including by ensuring that land and buildings do not go unnecessarily unused. We will therefore give consideration to The meanwhile (temporary) uses of vacant units buildings (including building units) or sites, particularly where they support provide for beneficial uses that might not otherwise have site opportunities available. This includes uses that support business development, community and cultural activities (particularly in Cultural Quarters) and those that help to address acute specialist local housing needs.

Commented [NE463]: Moved from Part 2 section on economy and culture - because these are temporary uses, the section fits better in this section. Also, meanwhile uses can also be non-employment uses (e.g. housing, Place/Ladywell).

19.20. 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.

19.21. 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.

19.22. All Development 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, taking into account relevant site allocation policies. Further, in line with other Local Plan policies, we will expect that M meanwhile uses de must not have an adverse impact on the amenity of neighbouring properties or the local area. 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, or otherwise harm the viability of the town centre.

19.23. To encourage meanwhile uses, T the Council may consider the future use of Local Development Orders (LDO) allowing temporary uses in specific locations subject to certain conditions being satisfied.

19.24. 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.

DM6 Health Impact Assessments

A. A desktop Health Impact Assessment (HIA) must be submitted with the following types of development proposals:

a. Major developments;

Commented [NE464]: Respond to public consultation – request that health impact assessments are required for new developments

- b. Developments located within an Air Quality Focus Area; and
- c. Developments including the following uses:
 - i. Hot-food takeaways
 - ii. Betting shops;
 - iii. Education facilities;
 - iv. Health and social care facilities;
 - v. Leisure and community facilities; and
 - vi. Publicly accessible open space.

B. Development proposals of a scale referable to the Greater London Authority must submit a detailed Health Impact Assessment.

Explanation

19.25. This policy supports the London Plan aims to create a healthy city by improving Londoners' health and reducing health inequalities. It also supports the objectives set out in Lewisham's Health and Wellbeing Strategy. HIAs will be required for development proposals which are most likely to impact on public health outcomes whether by virtue of their large scale, nature of uses or location in an area of poor air quality.

19.26. The London Healthy Urban Development Unit (HUDU) provides guidance on completing HIAs, which applicants should refer. This uses a checklist approach that can normally be completed as a desktop study. The HIA should be undertaken as early as possible in the planning and design process in order to identify opportunities for maximising public health benefits, minimising harm and addressing health inequalities. Development proposals must demonstrate how the HIA has been used to inform the design. The HIA can be completed as a standalone assessment or form part of an Integrated Impact Assessment, where appropriate. The scope of the HIA will depend on the nature, scale and location of development along with the potential impacts on public health and wellbeing.

19.27. Development proposals of a scale referable to the Greater London Authority must complete and submit a more extensive and full HIA.

DM57 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 19.1. 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

~~19.19~~19.28. 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.

~~19.20~~19.29. 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.

~~19.21~~19.30. 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.

~~19.22~~19.31. 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.

~~19.23~~19.32. 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 of 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 extension), we will seek to ensure that the maximum viable amount of genuinely affordable housing is secured on a site by site basis.

Table 19.1 Monitoring Framework

Ref	Measure	Indicator
High quality design and heritage		
LPI 1	Historic environment	Adoption of Area Appraisals and Management Plans for all conservation areas
Housing		
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 draft 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
Economy and culture		
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 net 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

Part Five:

Appendices and schedules

20 Appendices

Appendix 1: Abbreviations

Table 20.1 Abbreviations	
ACV	Asset of Community Value
ALGG	All London Green Grid
APA	Archaeological Priority Area
ASLC	Area of special local character
AQA	Air Quality Assessment
AQFA	Air Quality Focus Area
AQMA	Air Quality Management Area
BLE	Bakerloo Line Extension
BREEAM	Building Research Establishment Environmental Assessment Method
CAZ	Central Activities Zone
CEZ	Creative Enterprise Zone
CHP	Combined heat and power
CIBSE	Chartered Institution of Building Services Engineers
GiGL	Greenspace Information for Greater London
CIL	Community Infrastructure Levy
CO ₂	Carbon dioxide
DLR	Docklands Light Railway
EA	Environment Agency
EqIA	Equalities Impact Assessment
GLAAS	Greater London Archaeological Advisory Service
GIA	Gross Internal Area
GLA	Greater London Authority
GLHER	Greater London Historic Environment Record
Ha	Hectare
HIA	Health Impact Assessment
HMO	House in Multiple Occupation
HRA	Habitats Regulations Assessment
HSE	Health and Safety Executive
IIA	Integrated Impact Assessment
IMD	Index of Multiple Deprivation
kWh	Kilowatt hour
LDD	London Development Database
LEL	Local Employment Location
LHN	Local Housing Need
LSIS	Locally Significant Industrial Sites
LVMF	London View Management Framework
MEL	Mixed Use Employment Location
MHGLC	Ministry of Housing Communities and Local Government
MMO	Marine Management Organisation

MOL	Metropolitan Open Land
NHS	National Health Service
NO2	Nitrogen dioxide
NOx	Oxides of nitrogen, or nitrogen oxides: a mixture of nitric oxide and nitrogen dioxide
NPPG	National Planning Practice Guidance
NPPF	National Planning Policy Framework
OA	Opportunity Area
PBSA	Purpose-Built Student Accommodation
POS	Public Open Space
PSA	Primary Shopping Area
PTAL	Public Transport Access Level
RIGS	Regionally-Important Geological Sites
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SELCHP	The South East London Combined Heat and Power Plant
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance for Nature Conservation
SFRA	Strategic Flood Risk Assessment
SMEs	Small and medium-sized enterprises (including micro-businesses)
SPA	Special Protection Areas
SPG	Supplementary Planning Guidance
Sqm	Square metres
SUDs	Sustainable Urban Drainage Systems
TE2100	Thames Estuary 2100 Plan
TER	Target Emission Rate
TfL	Transport for London
UGS	Urban Green Space
UGF	Urban Greening Factor
VBC	Vacant Building Credit
WHS	World Heritage Sites
WFD	European water Framework Directive (WFD)

Appendix 2: Glossary

A

Active Frontage The front of a buildings with openings onto the space that generate activity and engagement between the building interior and the space outside, particularly entrances.

Affordable housing See also 'genuinely affordable housing', as well as Local Plan Policy HO3 and draft London Plan Policy H4).

Affordable Workspace Workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose.

Agent of Change Principle The principle places the responsibility of mitigating the impact of nuisances (including noise) from existing noise nuisance generating businesses uses on proposed new development close by, thereby ensuring that residents and users of the new development are protected from noise nuisances, and existing businesses uses are protected from noise nuisance complaints. Similarly, any new noise nuisance-generating development, for example a music venue, will need to put in place measures to mitigate noise impacts on existing development close by.

Air Quality Management Area (AQMA) Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.

Albedo The surface reflectivity of the sun's radiation.

Ambient Noise Ongoing sound in the environment such as from transport and industry, as distinct from individual events, such as a noisy all-night party. Unless stated otherwise, noise includes vibration.

Amenity Element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.

Amenity Space The outside space associated with a home or homes. It may be private or shared, depending on the building it serves.

Ancient or Veteran Tree A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient, but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Ancient Woodland An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).

Archaeological Interest There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

Areas of Deficiency in Access to Nature Areas where people have to walk more than one kilometre to reach a publicly accessible Metropolitan or Borough Site of Importance for Nature (SINC).

Areas of Deficiency in Access to Public Open Space Areas lacking in sufficient publicly accessible open space, as defined by a set of standards in Policy G4 of the London Plan

Article 4 Direction A tool used by local planning authorities to remove some or all permitted development rights that apply to a particular site or area.

B

Back Gardens Private amenity areas that were the entire back garden of a dwelling or dwellings as originally designed.

Backland Sites 'Landlocked' sites to the rear of street frontages not historically in garden use such as builders yards, small workshops and warehouses, and garages.

Biodiversity This refers to the variety of plants and animals and other living things in a particular area or region. It encompasses habitat diversity, species diversity and genetic diversity. Biodiversity has value in its own right and has social and economic value for human society.

Biodiversity Offsets Measures to improve existing or create replacement habitat where there are unavoidable impacts on wildlife habitats resulting from development or change of land use.

Biomass The total dry organic matter or stored energy of plant matter. As a fuel it includes energy crops and sewage as well as arboricultural forestry and agricultural residues.

Brown Field Land Previously developed land.

Build to Rent Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Building Research Establishment Environmental Assessment Method (BREEAM) A national environmental assessment and rating system for buildings. It is the most widely used environmental standard in the UK, used to assess those buildings and extensions to buildings that are not rated by the Code for Sustainable Homes.

C

Car Club A short-term car rental service that allows members access to cars parked locally for a per-minute, per-hour or per-day fee.

Car Free Development Car-free developments do not provide parking for cars on-site and there is no entitlement to on-street parking permits for residents. The exception to this is parking for accessible properties.

Carbon Dioxide (Co2) Principal greenhouse gas related to climate change.

Care Home Housing generally catering for older people, those less mobile or wheelchair users. Schemes may have their own care staff, and will usually provide one or more meals each day, if required. Bathrooms will be designed to make it easier for assistance to be offered.

Central Activities Zone (CAZ) The vibrant heart and globally iconic core of London. The CAZ contains a broad range of functions that have London-wide, national and international significance including Government, business, culture, research and education, retailing, tourism, transport and places of worship. The CAZ offers access to a unique collection of

heritage and environmental assets including World Heritage Sites, the Royal Parks and the River Thames

Circular economy An economic model in which resources are kept in use at the highest level possible for as long as possible in order to maximise value and reduce waste, moving away from the traditional linear economic model of 'make, use, dispose'.

Climate Change Adaptation Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate Change Mitigation Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Combined Heat and Power (CHP) The combined production of electricity and usable heat is known as Combined Heat and Power (CHP). Steam or hot water, which would otherwise be rejected when electricity alone is produced, is used for space or process heating.

Commercial Waste Waste arising from premises which are used wholly or mainly for trade, business, sport, recreation or entertainment as defined in Schedule 4 of the Controlled Waste Regulations 1992.

Communal Heating System A communal heating system supplies heat to multiple properties from a common heat source. It may range from a district system heating many buildings to a system serving an individual block of flats.

Community Facilities For the purposes of this Local Plan, community facilities can include: public houses, libraries, youth facilities, meeting places, places of worship, public conveniences and other uses in use class D1 that provide a service to the local community.

Community Infrastructure Levy (CIL) A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to pay for infrastructure projects identified by the Local Authority and/or the Mayor of London.

Comparison retail/shopping These refer to shopping for things like clothes, electrical items, household and leisure goods. Comparison goods are bought relatively infrequently, so consumers usually evaluate prices, features and quality before making a purchase.

Connectivity This refers to the number of connections and their integration, layout and relationship to one another and the impact this has on getting from A to B, by foot, bicycle and vehicle.

Conservation (Heritage) The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance

Conservation Area Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

Contributions Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.

Convenience retail/shopping These refer to shopping for everyday essential items like food, drink, newspapers and confectionery.

Core Strategy A Local Plan setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.

Creative Enterprise Zone (CEZ) A Mayor of London initiative to establish clusters of creative production, which provide affordable premises and enterprise-related incentives for artists and creative businesses, pro-culture planning and housing policies, and offer career pathways and creative jobs for local communities and young people.

Creative Industries Those industries which have their origin in individual creativity, skill and talent which have a potential for wealth and job creation through the generation and exploitation of intellectual property.

Cultural Quarters Areas where a critical mass of cultural activities and related uses, usually in historic or interesting environments, are designated as Cultural Quarters. They can contribute to urban regeneration

D

Decentralised Energy Local renewable and local low-carbon energy sources.

Deliverable "To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

Design and Access statement A statement that accompanies a planning application to explain the design principles and concepts that have informed the development and how access issues have been dealt with. The access element of the statement should demonstrate how the principles of inclusive design, including the specific needs of disabled people, have been integrated into the proposed development and how inclusion will be maintained and managed.

Design Concept The basic design ideas on which a proposal will be based, often expressed in a combination of words and visual material.

Designated Heritage Asset World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation

Developable To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.

Development Management These policies set out detailed criteria to carefully manage and control development through the planning application process.

Development Plan The London Plan, Local Plans, other Development Plan Documents and Neighbourhood Plans.

Development Proposal This refers to development that requires planning permission.

Digital Infrastructure Infrastructure, such as small cell antenna and ducts for cables, that supports fixed and mobile connectivity and therefore underpins smart technologies.

District Centre Distributed more widely than Metropolitan and Major centres, providing convenience goods and services, and social infrastructure for more local communities and accessible by public transport, walking and cycling. Typically, they contain 5,000–50,000 sqm of retail, leisure and service floor space. Some District centres have developed specialist shopping function.

District Heating Network A network of pipes carrying hot water or steam, usually underground that connects heat production equipment with heat customers. They can range from several metres to several kilometres in length.

Drainage Hierarchy Policy hierarchy helping to reduce the rate and volume of surface water run-off.

Dual Aspect Dwelling A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building. The provision of a bay window does not constitute dual aspect.

Dwelling A self-contained unit of residential accommodation; also referred to as a 'residential unit'.

E

Edge of Centre For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

Energy Efficiency Making the best or most efficient use of energy in order to achieve a given output of goods or services, and of comfort and convenience

Energy Hierarchy The Mayor's tiered approach to reducing carbon dioxide emissions in the built environment. The first step is to reduce energy demand (be lean), the second step is to supply energy efficiently (be clean) and the third step is using renewable energy (be green).

Environmental Impact Assessment A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Evidence Base The data and information about the current state of Lewisham used to inform the preparation of Local Plan documents.

F

Family housing A dwelling that by virtue of its size, layout and design is suitable for a family to live in and generally has three, four, five, or more bedrooms.

Flood Risk Assessment An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

Freight A general term to refer to trips made for the purposes of delivering goods, enabling servicing activity or supporting construction.

Future Proofing Ensuring that designs are adaptable and take account of expected future changes. For example, ensuring a heating system is designed to be compatible with a planned district heat network to allow connection in future.

G

Genuinely Affordable Housing In Lewisham, genuinely affordable housing is housing at social rent levels or the GLA London Affordable Rent level (in Lewisham this is GLA London Affordable Rent minus the 1 per cent above Consumer Price Index uplift).

Geodiversity The range of rocks, minerals, fossils, soils and landforms.

Green Belt A designated area of open land around London (or other urban areas). The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Corridor Relatively continuous areas of open space leading through the built environment, which may be linked and may not be publicly accessible to each other and to the Green Belt or Metropolitan Open Land. They often consist of rivers, railway embankments and cuttings, roadside verges, canals, parks, playing fields and extensive areas of private gardens. They may allow animals and plants to be found further into the built-up area than would otherwise be the case and provide an extension to the habitats of the sites they join.

Green Cover The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens

Green Infrastructure A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Green Roofs and Walls The total area covered by vegetation and water across London. It not only includes publicly accessible and publicly managed vegetated land (i.e. green space) and waterways, but also non-accessible green and blue spaces, as well as privately owned vegetated land including private gardens and agricultural land, and the area of vegetated cover on buildings and in the wider built environment such as green roofs, street trees and rain gardens

Green Space All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape

Greenhouse Gas Any gas that induces the greenhouse effect, trapping heat within the atmosphere that would normally be lost to space, resulting in an increase in average atmospheric temperatures, contributing to climate change. Examples include carbon dioxide, methane and nitrous oxides.

Greening The improvement of the appearance, function and wildlife value of the urban environment through soft landscaping use of vegetation or water.

Gypsy and Traveller Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

H

Habitable Room A habitable room is any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, corridors, hallways, utility rooms or similar should not be considered habitable rooms.

Health Impact Assessment (HIA) Used as a systematic framework to identify the potential impacts of a development proposal, policy or plan on the health and wellbeing of the population and highlight any health inequalities that may arise. HIA should be undertaken as early as possible in the plan making or design process to identify opportunities for maximising potential health gains, minimising harm, and addressing health inequalities.

Heat Map Is a graphical representation of data where elements are represented as colours. In this particular instance as the colour darkens the height increases.

Heritage Asset A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic Environment All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Historic Environment Record Information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use.

House of Multiple Occupation (HMO) Dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet. HMOs for between three and six people are classed as C4 (except for areas affected by an Article 4 Direction) whereas HMOs for more than six people are Sui Generis

Household Waste Household waste includes waste from collection rounds of domestic properties (including separate rounds for the collection of recyclables), street cleansing and litter collection, beach cleansing, bulky household waste collections, hazardous household waste collections, household clinical waste collections, garden waste collections, and any other household waste collected by the waste authorities.

Housing Need A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.

I

Independent Examination The process by which a planning inspector may publicly examine a Local Plan before issuing a report with recommendations that should be made prior to adoption of the Local Plan.

Infill Development Development that takes place on vacant or undeveloped sites between other developments and/or built form.

Infrastructure Includes transport, energy, water, waste, digital/smart, social and green infrastructure.

Inner London The area covered by the inner London boroughs.

Integrated Impact Assessment (IIA) As part of developing Tower Hamlet's Local Plan all policies have been subject to an IIA. The IIA comprises: Sustainability Appraisal, Health Impact Assessment, Equalities Impact Assessment and Habitat Regulation Assessment.

Intermediate

Intermediate Housing Homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the affordable housing definition. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent

L

Land Contamination (Assessment) A study of the level of contamination of the land on a development site, including, as appropriate, initial risk assessment, site investigation, remediation strategy and a verification plan and report.

Lewisham Transport Interchange This includes the mainline railway station, the DLR station and the bus layover site that covers the area sandwiched between both station buildings and the large roundabout that links the A20 and the A21.

Listed Building Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

Liveable Neighbourhoods Is a programme gives boroughs the opportunity to bid for funding for long-term schemes that encourage walking, cycling and the use of public transport.

Local Centre Typically serve a localised catchment often most accessible by walking and cycling and include local parades and small clusters of shops, as well as hosting a key community facility as an 'anchor' attracting visitors. They may include a small supermarket (typically up to around 500 sqm), sub-post office, pharmacy, laundrette and other useful local services.

Local Development Framework (LDF) The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.

Local Development Order An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Housing Need The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).

Local Plan A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Local Views A local line of sight from a particular point to an important local landmark, view or skyline.

Locally Listed Buildings These are buildings of historic or architectural interest at the local level. Although they are not legally protected, in general, close scrutiny will be given to any development affecting them.

London Panorama A broad prospect seen from an elevated public viewing place.

London Plan The London Plan is the spatial development strategy for all of London. It is prepared by the Greater London Authority. In London, Local Plans must be in general conformity with the London Plan.

Low Emission Zone Charging zone across most of Greater London for vehicles (excluding cars) that do not meet emissions standards

M

Main Town Centre Uses Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Major Centre Typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.

Major Development For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Masterplan "A document which sets out proposals for buildings, spaces, movement strategy and land use in text and three dimensions and matches these proposals to a delivery strategy. The masterplan can be described as a sophisticated 'model' that:

- shows how the streets, squares and open spaces of a neighbourhood are to be connected
- defines the heights, massing and bulk of buildings
- sets out suggested relationships between buildings and public spaces

- determines the distribution of activities and uses that will be allowed
- identifies the network of movement patterns for people moving by foot, cycle, car or public transport, service and refuse vehicles
- sets out the basis for provision of other infrastructure elements such as utilities
- relates physical form to the socio-economic and cultural context and stakeholder interests
- allows an understanding of how well a new, urban neighbourhood is integrated with the surrounding urban context and natural environment."

Metropolitan Open Land Extensive areas of land bounded by urban development around London that fulfils a similar function to Green Belt and is protected from inappropriate development by land-use planning policies.

Metropolitan Town Centre Serve wide catchments which can extend over several boroughs and into parts of the Wider South East. Typically they contain at least 100,000 sqm of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings

Mixed use Employment Location (MEL) Land currently in industrial use occupied by older and poorer quality industrial uses at low densities which may be incompatible with adjacent residential areas. The sites were considered by the Lewisham Employment Land Study to require redevelopment and have been designated to ensure mixed use development incorporating reprovision of business space to ensure the regeneration of a part of the borough where the environment is poor and levels of deprivation are high.

Mixed-use Development Development for a variety of activities on single sites or across wider areas such as town centres.

N

National Planning Policy Framework (NPPF) Prepared by the Government to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. The NPPF explains the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

Natural Surveillance When buildings around a space are designed with features that are likely to lead to people overlooking the space. These may be windows, balconies, front gardens or entrances.

Nature Conservation Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.

Neighbourhood Plan A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Noise and Vibration Assessment An assessment of noise and vibration that is either; existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.

Non-strategic Policies Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

North Facing North facing windows are generally defined as any windows within 45 degrees of due north.

O

Older People People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs

Open Space All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Opportunity Area London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility

Original Building A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally

Out of Town/ Out of Centre A location out of centre that is outside the existing urban area.

Outer Centre A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Outer London The area covered by the outer London boroughs.

Outstanding Universal Value Cultural and/or natural significance that is so exceptional that it transcends national boundaries and is of common importance for both present and future generations. An individual Statement of Outstanding Universal Value is agreed and adopted by the UNESCO World Heritage Committee for each World Heritage Site at the time of its inscription. This Value can be expressed by physical, architectural or intangible attributes that are embodied in the buildings, spaces, monuments, artefacts and archaeological deposits within the site, the setting and views of and from it. Statements of Outstanding Universal Value are key references for the effective protection and management of World Heritage Sites and can be found at <http://whc.unesco.org/en/list>.

P

People with Disabilities People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. These persons include, but are not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs.

Permission in Principle Form of planning consent which establishes that a site is suitable for a specified amount of housing-led development in principle. Following a grant of permission in principle, the site must receive a grant of technical details consent before development can proceed.

Planning and Compulsory Purchase Act 2004 National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it.

Planning condition A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Frameworks These frameworks provide a sustainable development programme for Opportunity Areas. The frameworks may be prepared by the GLA Group, boroughs, developers or partners. While planning frameworks will have a non-statutory status, it will be up to boroughs to decide how to reflect the proposals in planning frameworks within their Development Plans

Planning Obligation A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing Field The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Policies Map A part of the Local Plan illustrating the policies and showing the location of proposals on an Ordnance Survey base map.

Previously Developed Land Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Primary Shopping Area Defined area where retail development is concentrated.

Priority Habitats and Species Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Private Rented Sector All non-owner-occupied self-contained dwellings that are being rented out as housing (not including forms of affordable housing).

Public Transport Access Levels (PTALs) Public Transport Access Levels (PTALs) are calculated across London using a grid of points at 100m intervals. For each point walk time to the public transport network is combined with service wait time (frequency) to give a measure of public transport network density.

Q

Quiet Areas The Environmental Noise (England) Regulations 2006 (as amended) require that Noise Action Plans for agglomerations (including much of Greater London) include provisions that aim to protect any formally identified 'Quiet Areas' from an increase in road, railway, aircraft and industrial noise.

R

Recycling Involves the reprocessing of waste, either into the same product or a different one. Many non-hazardous wastes such as paper, glass, cardboard, plastics and metals can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Renewable Energy Energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material, but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy is generally included.

Retrofitting The addition of new technology or features to existing buildings in order to make them more efficient and to reduce their environmental impacts.

S

Safeguarded Wharves A network of sites that have been safeguarded for cargo handling uses such as intraport or transshipment movements and freight-related purposes by Safeguarding Directions. Sites that are safeguarded are set out in the Safeguarded Wharves Review (2017/2018).

Secondary Heat To recover useful energy, in the form of heat, from sources where processes or activities produce heat which is normally wasted (for example recovering heat from the Underground network) or from heat that exists naturally within the environment (air, ground and water).

Section 106 agreements These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

Self-build and Custom-build Housing Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Sequential Approach Planning policies that require particular steps to be taken, or types of location or sites to be considered, in a particular order of preference. For example retail, commercial and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are or can be well integrated with the existing centre and public transport

Serviced Accommodation In the context of visitor accommodation this includes hotels, bed & breakfasts, guest houses, and hostels where services such as catering and cleaning are provided to guests.

Setting of a Heritage Asset The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Shell and Core A commercial development where all internal finishes and services are left out, for provision by the tenant.

Significance (for heritage policy) Is the surrounding in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Single Family House Self-contained house occupied by a single family.

Site Allocation These establish land use principles and, where appropriate, site specific requirements for new development. The designations and site allocations will help to ensure that development within Lewisham is appropriately managed and does not compromise the achievement of the plan's vision and strategic objectives

Site of Importance for Nature Conservation Areas of land chosen to represent the best wildlife habitats in London and areas of land where people can experience nature close to where they live and work. Sites are classified into Sites of Metropolitan, Borough and Local Importance depending on their relative value. Unlike SSSIs, SINCs are not legally protected, but their value must be considered in any land use planning decision. Procedures for the identification of SINCs are set out in Appendix 5 of the Mayor's London Environment Strategy.

Social infrastructure Covers facilities such as health provision, early years provision, schools, colleges and universities, community, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.

Soundscape The overall quality of an acoustic environment as a place for human experience. Soundscape design might include preserving, reducing or eliminating certain sounds or combining and balancing sounds to create or enhance an attractive and stimulating acoustic environment.

Spatial Development Strategy A plan containing strategic policies prepared by a Mayor or a combined authority. It includes the London Plan (prepared under provisions in the Greater London Authority Act 1999) and plans prepared by combined authorities that have been given equivalent plan-making functions by an order made under the Local Democracy, Economic Development and Construction Act 2009 (as amended)

Special Areas of Conservation Areas defined by regulation 3 of the Conservation of Habitats and Species Regulations 2017 which have been given special protection as important conservation sites.

Specialist Accommodation for Older People "Some residents living in the borough require specialist accommodation to meet their social, physical, mental and/or health care needs. Specialist accommodation can be divided into three main types:

- Sheltered housing is self-contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has self-contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency.

- **Extra care accommodation** (sometimes also referred to as close care, assisted living, very sheltered or continuing care housing): Self-contained residential accommodation and associated facilities designed and managed to meet the needs and aspirations of people who by reason of age or vulnerability have an existing or foreseeable physical, sensory or mental health impairment. Each household has self-contained accommodation and 24 hour access to emergency support. In addition extra care accommodation includes a range of other facilities such as a resident's lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers. The exact mix of facilities will vary on a site by site basis. Some domiciliary care is provided as part of the accommodation package, according to the level of need of each resident. Extra care housing aims to create a balanced community, bringing together a balanced proportion of people with different levels of care needs.
- **Care homes** (including end of life/hospice care and dementia care): Nursing or residential care home providing non self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. Accommodation is not self-contained: meals and personal services are routinely provided to all residents. Communal facilities are likely to include a dining room and residents lounge. There will be a scheme manager and in house care team who provide a consistent presence. Personal or nursing care is a critical part of the accommodation package. Care homes include 24 hour medical care from a qualified nurse."

Specialist Housing Specialist housing refers to supported housing such as sheltered housing, residential care homes, nursing homes and dual-registered care homes.

Stakeholder A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.

Strategic Development Proposals involving over 100 homes or 10,000 square metres of floorspace.

Statement of Community Involvement (SCI) The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Areas for Regeneration These areas are the Census Local Super Output Areas (LSOAs) in greatest socio-economic need. They fall within the 20 per cent most deprived LSOAs in England, using the Index of Multiple Deprivation.

Strategic Environmental Assessment A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment

Strategic Flood Risk Assessment (SFRA) "An assessment usually undertaken by a Local Authority at a borough-wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with the NPPF. The Lewisham SFRA was produced by Jacobs and published in July 2008. Areas/sites are categorised as falling within one or more of the following flood zones:

- Flood Zone 1 Low probability of flooding. Defined as land outside flood zone 2 and having less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%).
- Flood Zone 2 Medium probability of flooding. Defined as land having between 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year.
- Flood Zone 3a High probability of flooding. Defined as land having 1 in 100 or greater annual probability of river flooding.
- Flood Zone 3b Land where water has to flow or be stored in times of flood. Defined as land having a 1 in 20 (5%) or greater annual probability of flooding in any year; or is designed to flood in an extreme (0.1%) flood, or at another probability to be agreed between the local authority and the Environment Agency."

Strategic Housing Land Availability Assessment (SHLAA) An assessment of land availability for housing which informs the London Plan and borough local development documents, as set out in Planning Policy Statement 3: Housing (PPS3).

Strategic Housing Market Assessment (SHMA) An assessment of housing need and demand which informs the London Plan and borough local development documents as set out in Planning Policy Statement 3: Housing (PPS3).

Strategic Industrial Locations/Land London's largest concentrations main reservoirs of industrial, logistics and related capacity for uses that support the functioning of London's economy.

Strategic Policies Policies and site allocations which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Streetscape The appearance of the street as a whole incorporating the road, kerb and gutter, verges, fences, trees and building frontages.

Supplementary Planning Documents Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainability Appraisal Required by the Planning and Compulsory Purchase Act 2004. Sustainability Appraisal is based on the principles of Strategic Environmental Assessment but is wider in focus and covers other key considerations of sustainability that also concern social and economic issues.

Sustainable Development There are three dimensions to sustainable development: economic, social and environmental. The economic role means contributing to a strong, responsive and competitive economy. The social role means supporting strong, vibrant and healthy communities. The environmental role means contributing to protecting and enhancing our natural, built and historic environment. To achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Sustainable Drainage Systems Using sustainable drainage techniques and managing surface water run-off from buildings and hardstandings in a way that reduces the total volume, flow and rate of surface water that runs directly into drains and sewers.

Sustainable Transport Modes Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

T

Thames Policy Area A special policy area to be defined by boroughs in which detailed appraisals of the riverside will be required.

Town Centre Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Transport Assessment A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed deal with the anticipated transport impacts of the development

Transport for London One of the GLA group of organisations, accountable to the Mayor, with responsibility for delivering an integrated and sustainable transport strategy for London.

Transport Statement A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel Plan A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed

Tree Preservation Order May be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

U

Urban Greening Urban greening describes the act of adding green infrastructure elements that are most applicable in London. Due to the morphology and density of the built environment in the city, green roofs, street trees, and additional vegetation, the most appropriate elements of green infrastructure.

Urban Greening Factor A land-use planning tool to help determine the amount of greening required in new developments.

Urban Heat Island The height of buildings and their arrangement means that while more heat is absorbed during the day, it takes longer to escape at night. As a result, the centre of London can be up to 10°C warmer than the rural areas around the city. The temperature difference is usually larger at night than during the day. The Urban Heat Island effect is noticeable during both the summer and winter months.

V

Viability Assessment An assessment of the financial viability of a development to determine the maximum level of affordable housing and other policy requirements where relevant to be undertaken in line with the methodology and approach set out in Policy H6 and the Mayor's Affordable Housing and Viability SPG.

Viability Review Mechanism A review of development viability defined with a Section 106 agreement enabling the reassessment of development viability after permission has been granted, at an early, mid or late stage in the development process. These mechanisms address uncertainties in the application stage assessment of viability to enable the maximum level of affordable housing provision over the lifetime of a proposal.

Visitor Accommodation "Leisure and business accommodation that provides temporary overnight accommodation on a commercial basis, including serviced accommodation such as hotels, bed and breakfast, guesthouses, hostels and campus accommodation, and non-serviced accommodation such as self-catering apart-hotels, caravans and camping."

W

Water spaces Areas covered by water including the River Thames and other rivers, canals, reservoirs, lakes and ponds.

Waterlink Way A long distance cycle/pedestrian route following the River Ravensbourne from the south of the borough to the Thames at Deptford.

Wider Determinants of Health The wider determinants of health are a diverse range of social, economic and environmental factors which impact on people's health and life expectancy. They include transport, housing, education, income, working conditions, unemployment, air quality, green space, climate change and social and community networks.

Windfall Development (sites) Sites not specifically identified in the development plan.

Z

Zero-carbon Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

*These definitions have been referenced from the NPPF (2019), The London Plan (2016) previous Lewisham Council Development Management documents

Appendix 3: Non-strategic policies

The NPPF (2019), paragraph 21, sets out that local plans should identify and distinguish strategic policies from other non-strategic policies. All policies within this Local Plan, including the site allocations, are strategic policies except for the non-strategic policies identified in the table below.

Table 20.2 Non-strategic policies

Part	Section	Reference	Policy title
Two	5	QD8	Noise and vibration
Two	5	QD9	External lighting
Two	5	QD12	Shopfronts
Two	5	QD13	Outdoor advertisements, digital displays and hoardings
Two	8	EC16	Shopping parades, corner shops and other service points
Two	8	EC21	Visitor accommodation
Two	9	CI4	Nurseries and childcare facilities
Two	9	CI5	Burial space
Two	10	GR5	Food growing
Two	12	TR6	Taxis and private hire vehicles

Appendix 4: Policy replacement table and deleted policies

The Regulation 19 stage document will include a schedule of the extant development plan policies which are proposed to be replaced and superseded by the new Local Plan policies.

Appendix 5 Further information on proposals for public houses

This Appendix must be read in conjunction with draft Local Plan policy EC19 (Public Houses), which sets out requirements for submission of viability and marketing information to support certain types of development proposals.

Viability statement

In order to ensure that the Council can make a sound assessment when a change of use is Proposed, applicants will be required to submit a Viability Statement.

This will need to include:

1. Evidence in the form of at least the last three trading years of audited accounts.
2. All reasonable efforts have been made to preserve the public house (including all diversification options explored) and evidence supplied to illustrate that it would not be economically viable to retain the building or site for its existing use class. Examples of the initiatives or proposals that could be explored are as follows:
 - a. adding a kitchen and serving food, or improving the existing food offer
 - b. making the pub, garden, food offer more 'family-friendly'
 - c. providing events and entertainment such as quiz nights, amplified or non-amplified live music, comedy/cabaret nights
 - d. hiring rooms out or otherwise providing a venue for local meetings, community groups, businesses, youth groups, children's day nurseries
 - e. offering take-away food and off-licence services
 - f. provision of bed & breakfast or other guest accommodation

- g. sharing the premises with other businesses
- h. altering business and operating hours.

Marketing statement

The Council will require clear evidence of appropriate marketing to show a lack of demand for the public house. This will mean the submission of a Marketing statement including the following information:

1. Details of the company/person who carried out the marketing exercise.
2. The marketing process should last for at least 36 months.
3. The asking price should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional RICS valuer with expertise in the licensed leisure sector and who is not engaged to market the property.
4. The marketing exercise should be sufficiently thorough and utilise all available forms of advertising media and therefore include as a minimum:
 - a. a for Sale/for Rent signboard
 - b. adverts in the local press
 - c. adverts in appropriate trade magazines/ journals
 - d. adverts on appropriate trade websites
 - e. adverts through both national and local estate agents (including their websites) and
 - f. a targeted mail shot or email to an agreed list of potential purchasers.

Local consultation and use of the public house by community and voluntary organisations

The use of public house space for community groups is a valued resource and evidence will be required demonstrating consultation has taken place with local community and voluntary organisations. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.

Where there is local need, this use should be retained or replaced within the building, unless an alternative approach can be identified and agreed. The retention of the ground floor for non-residential use will help maintain street activity and a mixed use neighbourhood.

The Council may also consider adding certain public houses to the Community Assets register if the community support for their retention is significant

21 Schedules

Schedule 1: Strategic and local views, vistas and landmarks

Table 21.1 Table showing designated views and local landmarks

Site address	Easting (X) Coordinate	Northing (Y) Coordinate
London Strategic Views		
Blackheath Central Point <u>to Central London</u>	538306	176822
<u>Greenwich Park to Central London</u>		
Local Land Marks		
Horniman Museum (front façade) at London Road, Forest Hill	534860	173105
The Apostles (formerly Christ Church) at Church Rise, Forest Hill	535747	172819
St. Bartholomew's Church at Westwood Hill, Sydenham	535096	171671
St Pauls Church at Marry Ann Gardens, Deptford	537287	177480
St Mary's the Virgin Parish Church at Lewisham High Street, Lewisham	537942	174836
Ladywell Water Tower at Dressington Avenue, Ladywell	537260	174556
Lewisham Clock Tower at Lewisham High Street, Lewisham	538332	175596
All Saints Church at All Saints Drive, Blackheath	539549	176275
Lewisham Local Views		
Horniman Gardens at London Road, Forest Hill	534860	173237
Telegraph Hill Upper Park at Kitto Road, Telegraph Hill	537458	176070
Foreshore at Strand, North Deptford	536848	178584
Blythe Hill Fields at Blythe Hill Lane, Blythe Hill	536614	173824
Hilly Fields at Vicars Hill, Brockley	537347	175309
Mountsfield Park at Stainton Road, Hither Green	538415	173924
Forster Memorial Park at Whitefoot Lane, Downham	538771	172226

Commented [NE465]: This will be subject to review taking into account the Tall Buildings Study Update and consultation responses suggesting additional views to be designated

Schedule 2: Designated heritage assets

Conservation Areas

Belmont, Blackheath, Brockley, Brookmill Road, Christmas Estate, Cobbs Corner, Culverley Green, Deptford Creekside, Deptford High Street and St Pauls, Forest Hill, Halifax Street, Hatcham, Jews Walk, Ladywell, Lee Manor, Lewisham Park, Mercia Grove, Somerset Gardens, St Johns, St Marys, St Pauls, St Stephens, Stanstead Grove, Sydenham Hill / Mount Gardens, Sydenham Park, Telegraph Hill

Article 4 Directions on the Historic Environment

Baring Hall Hotel, Beckenham Place Park, Belmont, Blackheath, Brockley, Brookmill Road, Cobbs Corner, Culverley Green, Deptford Creekside, Deptford High Street and St Pauls, Deptford Town Hall, Forest Hill, Halifax Street, Hatcham, Jews Walk, Ladywell, Lammas Green, Lee Manor, Lewisham Park, Mercia Grove, Perry Vale and Christmas Estate, Perry Fields, Somerset Gardens, St Johns, St Marys, St Stephens, Stanstead Grove, Sydenham Hill, Sydenham Park, Sydenham Thorpe's, Telegraph Hill

World Heritage Site

Maritime Greenwich

Scheduled Ancient Monument

The Tudor Naval Storehouse in the former Royal Naval Shipyard, Deptford, now known as Convoys Wharf

Registered Parks and Gardens

Grove Park Cemetery, Manor Park Gardens

London Squares

Addington Grove, Adelaide Avenue, Culverley Green - Culverley Road, Deptford Memorial Gardens, Dermody Road, Duncombe Hill, Fambridge Close, Lewisham High Street London Squares (west side between Bradgate Road and Ladywell Road), Lewisham Memorial Gardens - Lewisham High Street, Lewisham Way/Wickham Road, London Squares at Catford (Rushey Green east side between Davenport and Rosenthal Road and squares to the north and south of junction with Brownhill Road), Wickham Gardens

Schedule 3: Non-designated heritage assets

Archaeological Priority Area (APA) and name

APA1: Thames Alluvial Floodplain, APA2: Thames and Ravensbourne Terrace Gravels, APA3: Watling Street and the 'Deep-Ford', APA4: London - Lewes Roman Road, APA5: Bell Green, APA6: Lewisham and Catford/Rushey Green, APA7: Deptford - The Strand, Sayes Court and Royal Naval Dockyard, APA8: Deptford Creek, APA9: Upper Deptford APA10: Deptford - The Broadway and Tanners Hill, APA11: Lee, APA12: Sydenham, APA13: Southend, APA14: New Cross APA15: Perry Street APA16: Brockley jack APA17: Brockley Priory APA18: Blackheath and Blackheath Village APA19: The Manor House, Lee APA20: Beckenham Place Park APA21: Wells Park

Areas of Special Local Character

Silk Mills Path Loampit Hill Dermody Gardens Manor Park Lee Green Rockbourne Park
~~Sydenham Extension~~ ~~Kirkdate~~ Hall Drive Charleville Circus Woolstone and Hurstbourne
 Road Bellingham Estate Sydenham Hill Ridge

Commented [NE466]: Respond to consultation – request that Sydenham Hill Ridge be included as an ASLC, in line with extant plan

Schedule 4: Designated employment land

Type	Ref	Location	Proposed changes to Policies Map
Strategic Industrial Location	SIL	Bromley Road Surrey Canal Road	<p>Bromley Road Shopping frontages along Randlesdown Road de-designated from SIL.</p> <p>Surrey Canal Road Bermondsey Dive Under site designated as SIL.</p> <p>Evelyn Court, Apollo Business Centre and Land at Surrey Canal Road and Trundelys Road sites de-designated from SIL.</p>
Locally Significant Industrial Site	LSIS	Apollo Business Centre Blackheath Hill Childers Street West Clyde Vale Endwell Rd Evelyn Court Evelyn Street Lower Creekside Malham Rd Manor Lane Molesworth Street Perry Vale Stanton Square Trundelys Road Willow Way Worsley Bridge Rd	<p>Terminology Local Employment Land (LEL) re-named LSIS for consistency with terminology used in London Plan.</p> <p>Childers Street Childers Street West designated LSIS. (Childers Street East remains designated MEL).</p> <p>Malham Road 188 Stansted Road designated as LSIS.</p> <p>Apollo Business Centre, Evelyn Court, Trundelys Road Re-designated as LSIS from SIL</p>
Mixed-use Employment Location	MEL	Arklow Rd Childers Street East Convoys Wharf Grinstead Rd Oxestalls Rd Plough Way Sun and Kent Wharf Surrey Canal Triangle	<p>Childers Street Childers Street East remains designated MEL. (Childers Street West designated as LSIS).</p>
Non-designated employment site	Not Applicable	Dispersed throughout Borough	

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Schedule 5:

Town centre	Primary Shopping Area	Proposed changes to Policies Map
MAJOR		
Lewisham	<p>Lewisham High Street: 212 to 50, 197 to 131 and 85 to 93</p> <p>Lewis Grove: 129 to 97 and 1 to 43</p> <p>Lewisham shopping centre: ground floor units</p> <p>Lewisham Gateway: ground floor units</p>	<p>Town centre boundary Amended to include: 129 Lewisham High Street; 100 Granville Park; Prendergast Vale School Cornmill Gardens; the remainder of Connington Road to Elverson Road DLR Station; the remainder of Lee High Rd (including Manor Park Parade) to Halley Gardens.</p> <p>Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.</p>
Catford	<p>Catford Broadway: ground floor units</p> <p>Catford Road: Station Buildings and 1 to 9</p> <p>Winslade Way: 36 to 2, 38 to 6 and 123 to 9</p> <p>Rushey Green: 58 to 166 and 75 to 199</p>	<p>Town centre boundary Amended to include: Catford Station; Grosvenour Court at Adenmore Road; Halford and Wickes site.</p> <p>Amended to exclude: Residential properties bounded by Brownhill Road, Plassy Road, Bowness Road and Engleheart Road; Residential building at Scooby Street; Holbeach School; Residential properties consisting of terraced housing bounded by Doggett Road, Thomas Lane, Holbeach Road and Catford Road.</p> <p>Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.</p>
DISTRICT		
Blackheath	<p>Tranquil Vale: 1 to 49, 36 to 74 and 16</p> <p>Montpelier Vale: 2 to 36 and 1 to 47</p> <p>Blackheath Village: 0 to 16 and 1 to 11</p> <p>Royal Parade: 8 to 17</p>	<p>Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.</p>
Deptford	<p>Deptford High Street: 1 to 179 and 2 to 164</p> <p>Deptford Broadway: 1</p>	<p>Town centre boundary Amended to include: The area and properties bounded by Evelyn Street, Deptford High Street and Albury Street.</p>

	Deptford Market Yard: Carriage way, Arches and 2 St Pauls House	Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
Downham	Bromley Road: 436 to 500 and 431 to 499	Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
Forest Hill	London Road: 1 to 55 and 2 to 56 David's Road: 1 to 5 Devonshire Road: 2 to Forest Hill Station and 1 to 7 Dartmouth Road: 1 to 35 and 2 to 28	Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
Lee	Burnt Ash Road: 2 to 14, 1 to 27 and the Leegate Centre Eltham Road: 2 to 18 Lee High Road: 432 to 422 and 321 to 351 Lee Road: 128 to 120	Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
New Cross	New Cross Road: 257 to 407	Town centre boundary Extended to include: 256 to 268 New Cross Road Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
New Cross Road	Not applicable (See Local Centres for further information)	Town centre hierarchy De-designated as District Centre, and re-designated Local Centre.
Sydenham	Sydenham Road: 4 to 78 and 3 to 111 Sydenham Station Approach: 2 to 12 Kirkdale: 313 to 325 and 260 to 278	Town centre boundary Amended to include: 180 to 190 Sydenham Road Shopping frontages Primary and secondary frontages removed. Replaced by Primary Shopping Area.
LOCAL	Local Centre frontages	
All centres	Not applicable	Terminology Neighbourhood Local Centre re- named Local Centre.
Bellingham	Randlesdown Road: 4 to 50 and the Fellowship	Town centre hierarchy New designated Local Centre.

	Bromley Road: 205 to 265	
Brockley	Coulgate Street: all ground floor units Harefield Road: 1 to 7 Brockley Road: 186 to 188 and 169 to 201 Brockley Cross: 1 to 9, 21 to 25 and 2 to 28 Endwell: 100 to 110 Malpas Road: 253 to 259 and 246 to 248	
Burnt Ash	Burnt Ash Road: 111 to 133 and 116 to 136 Burnt Ash Hill: 1 to 45	Town centre hierarchy New designated Local Centre.
Crofton Park	Brockley Road: 322 to 410, 349 to 409 and 435 to 447	
Downham Way	Downham Way: 419, 431 to 457 and 430 to 406	
Evelyn Street	Evelyn Street: 262 to 232, 299 to 321, 204 to 210, 186 to 190, 154 to 166 and 195	Town centre hierarchy New designated Local Centre.
Grove Park	Baring Road: 342 to 386 and 293 to 325 Downham Way: 589 and 636 to 650	
Honor Oak and Brockley Rise	Honor Oak Park: 38 to 78, 25 to 63 and 1 to 5 Brockley Rise: 56 to 104 and 119 to 139	Town centre hierarchy New designated Local Centre.
Ladywell	Ladywell Road: 71 to 111 and 38 to 80 Algernon Road: 251 to 259 and 222 to 230	Town centre hierarchy New designated Local Centre.
Lewisham Way	Lewisham Way: 119 to 249, 138 to 154 and 110 to 118 The Parade Upper Brockley Road: 7a to 13	
New Cross Road	Queens Road: 387 to 401 New Cross Road: 105 to 205, 92 to 110 and 116 to 184	Town centre hierarchy De-designated as District Centre. Designated Local Centre
Staplehurst Road	Staplehurst Road: 9 to 37 and 2 to 28	Town centre hierarchy New designated Local Centre.

Upper Sydenham	Kirkdale road: 92 to 112 150 and 97 to 191 Dartmouth Road: 184 to 190	Town centre hierarchy New designated Local Centre.
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Schedule 6: CEZ, Cultural Quarters and Night-time Economy Hubs

Lewisham North Creative Enterprise Zone applies to the following wards
Evelyn, New Cross, Telegraph Hill (part), Brockley (Part)

Cultural Quarters	Location
Deptford	Deptford District Centre and west of Deptford Creek
New Cross	Goldsmiths College, northern end of Lewisham Way and western end of New Cross Road
Forest Hill	118 Stanstead Road, west of the railway line within Forest Hill District Centre, Horniman Museum and Gardens and Horniman Play Park.

Night-time Economy Hubs	
Location	Type
Lewisham Major Centre	Area with more than local significance (NT3)
Catford Major Centre	Area with more than local significance (NT3)
Blackheath District Centre	Area with more than local significance (NT3)
New Cross Gate District Centre	Area with more than local significance (NT3)
New Cross Road Local Centre	Area with more than local significance (NT3)
Deptford District Centre	Area with local significance
Forest Hill District Centre	Area with local significance

Schedule 7: Designated Open Spaces

Table 21.2: Table showing a list of open spaces their designations

Site	Open Space Type	Open Space Designation
Abbotshall Rd	Sports Ground	UGS
Adamsrill Rd, disused allotments	Allotments	UGS
Adolf St/Overdown Rd	Allotments	UGS
Albion Villas Millennium Green	Miscellaneous - Amenity Greenspace	POS
Bellingham Leisure and Lifestyle Centre Randlesdown Rd	Sports Ground	UGS
Ballamore/Shroffold Rd	Allotments	UGS
Baring Rd and Bramdean Rd r/o	Allotments	MOL/UGS
Barmeston Rd	Allotments	UGS
Barriedale	Allotments	UGS
Baxter Field, Radlet Avenue	Park	POS
Beachborough Gardens, Beachborough Rd	Miscellaneous - Amenity Greenspace	POS
Beaulieu Avenue Green	Miscellaneous -Amenity Greenspace	UGS

Commented [NE467]: This will be subject to review pending outcomes of the Open Spaces Study and MOL Review Study updates

Beckenham Hill Park	Miscellaneous - Amenity Greenspace	POS/Green Grid
Beckenham Place Park	Park	MOL/POS/Green Grid
Bellingham Bowling Club, Greenside Close, Penderry Rise	Sports Ground	UGS
Bellingham Green	Park	POS
Bellingham Play Park, Winsford Rd	Park	MOL/POS
Besson Street Nature Reserve	Miscellaneous	POS
Blackheath	Park	MOL/POS/Green Grid
Catford & Cyphers Cricket Club, Rubens St	Sports Ground	MOL/UGS
Blackhorse Rd	Allotments	UGS
Blythe Hill	Allotments	UGS
Blythe Hill Fields	Park, SINC	POS Proposed change to Policies Map Open space status changed to POS and MOL
Bridge Leisure Centre East, Kangley Bridge Rd	Sports Ground	UGS
Bridge Leisure Centre West, Kangley Bridge Rd	Sports Ground	UGS
Bridgehouse Meadows, Surrey Canal Rd	Park	POS
BRdmead	Allotments	UGS
BRdway Fields West, Brookmill Rd	Park	MOL/POS
Broadway Fields East, Deals Gateway	Park	POS
Brockley & Ladywell Cemetery	Miscellaneous Cemeteries and churchyards	POS
Brockley Hill Private Gardens	Miscellaneous – Private Gardens	UGS
Bromley Hill Cemetery	Miscellaneous – Cemeteries and churchyards	POS
Brookmill Nature Reserve, Brookmill Rd	Miscellaneous -	UGS
Brookmill Park, River Ravensbourne and Nature Area	Park, SINC	MOL/UGS/POS
Burnt Ash Pond Nature Reserve, Melrose Close	Miscellaneous	UGS
Castillon Rd	Allotments	UGS
Catford Wanderers Sports Club, Beckenham Hill Rd	Sports Ground	UGS
Chinbrook Community Orchard	Miscellaneous - SINC	MOL/UGS/Green Grid
Chinbrook Meadows	Allotments	MOL/UGS/Green Grid

Chinbrook Meadows	Park, Green Corridor	MOL/POS/Green Grid
Clarendon Rise/Dermody Rd	Allotments	UGS
Conington Rd	Miscellaneous – Amenity Greenspace	POS
Cornmill Gardens	Park	MOL/POS
Crossfield Street Open Space	Miscellaneous – Amenity Greenspace	POS
Culverley Green	Miscellaneous – Amenity Greenspace	POS
Dacre Park	Allotments	UGS
Dacres Wood Nature Reserve, Dacres Rd	Miscellaneous	POS
Dartmouth Rd Open Space	Miscellaneous – Amenity Greenspace	POS
De Frene Rd Allotments r/o 37	Allotments	UGS
Deloraine Street	Allotments	UGS
Deptford Park	Park	POS
Devonshire Rd Nature Reserve	Miscellaneous	UGS
Downham Playing Fields	Miscellaneous – Playing Fields	POS
Downham Way, The Green	Miscellaneous – Amenity Greenspace	POS
Durham Hill (Downham Fields)	Park	POS
Eckington Gardens, Casella Rd	Park	POS
Edith Nesbitt Gardens, Leyland Rd, Osberton Rd	Park	POS
Edward Street	Allotments	UGS
Edward Street play area (New Deptford Green)	Miscellaneous – Playing courts	UGS
Elfrida Crescent East	Miscellaneous – Amenity Greenspace	UGS
Elm Lane Sports Ground	Sports Ground	MOL/UGS/Green Grid
Evelyn Green	Park	POS
Exford Rd Allotments	Allotments	MOL/UGS
Exford Rd Allotments Entrance	Miscellaneous – Amenity Greenspace	MOL/UGS
Exford Rd/Burnt Ash Hill Triangle	Miscellaneous – Amenity Greenspace	UGS
Farmstead Rd/Overdown Rd	Miscellaneous – Amenity Greenspace	UGS
Ferranti Park	Park	POS
Firhill Rd Playing field	Sports Ground	MOL/UGS/Green Grid
Firhill Rd North Allotments	Allotments	UGS
Firhill Rd South Allotments	Allotments	UGS
Folkestone Gardens, Trundleys Rd	Park	POS
Fordham Park, Pagnell Street	Park	POS
Forest Hill Bowls Club, Wynell Rd	Sports Ground	UGS

Forster Memorial Park	Park	POS
Friendly Gardens	Park	POS
Garthorne Rd Nature Reserve	Miscellaneous – SINC	UGS
Grangemill Way Allotments	Allotments	UGS
Ghent Street	Miscellaneous – Amenity Green Space	UGS
Gilmore Rd Triangle	Park	POS
Goan Club, Ravensbourne Avenue	Sports Ground	MOL/UGS
Goldsmiths' College Green	Miscellaneous – Amenity Green Space	UGS
Grove Park Cemetery	Miscellaneous – Cemeteries and churchyards	MOL/Green Grid
Grove Park Library and Gardens	Park	MOL/POS/ Green Grid
Guys Hospital Sports Ground, Brockley Rise	Sports Ground	UGS
Hatcham Gardens	Park	POS
Hazelbank Rd Allotments	Allotments	UGS
Hilly Fields	Park	POS
Hither Green Sidings	Miscellaneous –open green space, SINC	MOL
Hither Green Cemetery	Miscellaneous – Cemeteries and churchyards	MOL/Green Grid
Hither Green Nature Reserve	Miscellaneous	MOL/UGS
Home Park	Park	POS
Honor Oak Adventure Playground and Nature Reserve	Miscellaneous	UGS
Honor Oak Covered Reservoir	Miscellaneous – SINC	UGS
Horniman Gardens	Park	MOL/POS/Green Grid
Horniman Play Park	Park	POS/ Green Grid
Horniman Drive/Rocombe Crescent Triangle	Miscellaneous – Amenity Greenspace	UGS
Hurstbourne Rd Allotments	Allotments	UGS
Jim Hurren Allotments, Overdown Rd (south)	Allotments	UGS
Jubilee Sports Ground (St Dunstan's Enterprises)	Sports Ground	POS/MOL Proposed change to Policies Map De-designation of approximately 0.40 ha MOL located at the northern tip of Jubilee Sports Ground
Kendale Rd Allotments	Allotments	UGS
Kirkdale Green	Park	POS
Knapmill Way Allotments	Allotments	UGS

Ladywell Fields * including Nature Reserve	Park, Green Corridor	MOL/POS/UGS/Green Grid
Ladywell Lodge/Green	Park	POS
Launcelot Rd, disused allotments	Allotments	UGS
Lee & District Land Club r/o Baring Rd	Allotments	MOL/UGS
Leslie Silk Allotments, Overdown Rd (north)	Allotments	UGS
Lewisham Park	Park	POS
Long Meadow Allotments	Allotments	MOL/UGS
Longshore, Sites at	Amenity Greenspace	POS
Longton Nursery, Churchley Rd	Allotments	UGS
Luxmore Gardens	Park	POS
Manor House Gardens	Park	POS
Manor Park	Park	POS
Margaret McMillan Park	Park	POS
Mayow Park	Park, SINC	POS
Meadow Close Allotments	Allotments	UGS
Midland Bank Sports Ground, Calmont Rd	Sports Ground	MOL/UGS
Milborough Crescent	Miscellaneous - Amenity Greenspace	UGS
Mountsfield Park	Park, SINC	POS Proposed change to Policies Map Open space status change to POS and MOL
New Cross Gate Cutting Nature Reserve	Miscellaneous	UGS
Northbrook Park	Park, Green Corridor	MOL/POS/Green Grid
Oldstead Rd	Allotments	UGS
Oslac Rd	Miscellaneous - Amenity green/playspace	POS
Pepys Park including Nature Area	Park	POS
Pitfold Close Amenity Space	Miscellaneous – Amenity greenspace	UGS
Prendergast Girls' School fields	Sports Ground	UGS
Priestfield Rd	Allotments	UGS
Quaggy Gardens	Miscellaneous - Amenity Space	POS
Queen's Rd	Miscellaneous – Amenity Greenspace	UGS
Queenswood Rd Nature Reserve	Miscellaneous	UGS
Ravensbourne Park Gardens	Park	POS
Reigate Rd Open Space	Miscellaneous - Amenity Green Space	MOL/POS

Riverview Pool Linear Walk/Riverview Walk/Waterlink Way	Park	MOL/POS/Green Grid
Romborough Gardens	Allotments	UGS
Royal Naval Place Stage 1	Allotments	UGS
Royal Naval Place Stage 2	Allotments	UGS
Rutland Walk Sports Club, Rutland Walk	Sports Ground	MOL/UGS/Green Grid
Sayes Court Park	Park	POS
Sedgehill School	Miscellaneous - Amenity Open Space, Playing, Fields	MOL/UGS/Green Grid
Sedgehill Rd	Allotments	MOL/UGS/Green Grid
Shaw Rd	Miscellaneous – Amenity Green Space and SINC	POS
Slaithwaite Rd Allotments	Allotments	UGS
Southend Park	Park	POS/Green Grid
St Dunstan's College, Stanstead Rd	Sports Grounds	UGS/Green Grid
St Joseph's Academy Playing Fields	Sports Grounds	UGS
St Mary's Churchyard, Lewisham High Street	Miscellaneous – Cemeteries and churchyards	MOL
St Mildred's Rd, Allotments	Allotments	MOL/UGS
St Norbert Green	Park	POS
St Norbert Rd	Allotments	UGS
St Paul's Churchyard and Children's Playground	Park	POS
Stanley Street Allotments	Allotments	UGS
Ringway Centre/Stratfield House Baring Rd	Miscellaneous – Amenity Space	MOL
Sue Godfrey Nature Park	Miscellaneous – Green Open Space	POS
Sydenham Cottages Nature Reserve	Miscellaneous	MOL/POS
Sydenham Park Allotments	Allotments	UGS
Sydenham Park Rd, r/o 141-143	Miscellaneous – Amenity Greenspace	UGS
Sydenham Wells Park	Park	POS/Green Grid
Tarleton Gardens inc. Eliot Bank Hedge	Miscellaneous – Amenity Green Space	UGS
Taylor's Lane Allotments	Allotments	UGS
Telegraph Hill Park	Park	MOL/POS/Green Grid
Ten-Em-Bee Sports Club, Old Bromley Rd	Sports Grounds	MOL/UGS
Thurbarn Rd	Miscellaneous – Amenity green/playspace	POS
Trewsbury Rd	Allotments	UGS

Turnham Rd Green	Miscellaneous – Amenity green space	UGS
Weavers Estate Allotments, Engleheart Rd	Allotments	UGS
Whitefoot Recreation Ground	Sports Ground and Green Corridor	UGS
Windlass Place	Allotments	UGS
Woodland Walk Downham	Park	POS
Woodyates Rd and Pitfold Rd r/o	Miscellaneous – Amenity Green Space	UGS
Railway area between Friendly Street and St John's Vale	Green Corridor	
Railway areas between Elverson Rd and Bertrand Street, Elverson Rd and Granville Park and between Thurston Rd River Ravensbourne	Green Corridor	
Hither Green Station Railway Lands	Green Corridor	
Railway line areas between Oldfield Grove and south east corner of Bridgehouse Meadows	Green Corridor	
Railway line area between south western corner of Bridgehouse Meadows and White Post Street	Green Corridor	
Railway line area between Engate Street and Ennersdale Rd	Green Corridor	
Railway line area including Lee Station between Lee High Rd and borough boundary	Green Corridor	
Railway line area between Crofton Park and Ladywell Fields	Green Corridor	
Railway line area between Forest Hill and Sydenham not protected by SINC designations	Green Corridor	
Railway Area/Amblecote Meadows/Pullman Close	Green Corridor	
Railway area between south end of Cumberland Place and Baring Rd	Green Corridor	
Railway line areas between New Cross/New Cross Gate and Surrey Canal Rd	Green Corridor	

Schedule 8: Designated Sites of Importance for Nature Conservation

Table 21.3: Table showing Sites of Importance for Nature Conservation

Commented [NE468]: This will be subject to review pending outcomes of the Open Spaces Study and MOL Review Study updates

Sites of metropolitan importance	
Site name	Proposed changes to Policies Map
River Thames and tidal tributaries	
Blackheath and Greenwich Park	
Forest Hill to New Cross Gate Railway Cutting	
Beckenham Place Park (Local Nature Reserve)	<p>Site name Changed from 'Beckenham Place Park'.</p> <p>Boundary Extended in south west corner</p>

Sites of borough importance	
Site name	Proposed changes to Policies Map
Brockley and Ladywell Cemeteries	
Hither Green Cemetery, Lewisham Crematorium and Reigate Rd Open Space	Boundary Extended along south east corner
Downham Woodland Walk (Local Nature Reserve)	Boundary Extended in southern corner
Pool River Linear Park	Boundary Extended in two areas along western boundary, with two small areas excluded along Fordmill Road
Hillcrest Estate Woodland	
Grove Park Nature Reserve	
Forster Memorial Park	Boundary Extended to include a small area along the southwest and southeast corner
Burnt Ash Pond (Local Nature Reserve)	Site name Changed from 'Burnt Ash Pond Nature Reserve'
Horniman Gardens, Horniman Railway Trail and Horniman Triangle	Boundary Extended along southwest corner
Durham Hill	Boundary Reconfigured along northern boundary
Dacres Wood Nature Reserve and Sydenham Park Railway Cutting (Local Nature Reserve)	Site name Changed from 'Dacres Wood Nature Reserve and Sydenham Park Railway Cutting'
Loat's Pit	
Grove Park Cemetery	
Sue Godfrey Nature Park (Local Nature Reserve)	Site name Changed from 'Sue Godfrey Nature Park'
Honor Oak Rd Covered Reservoir	
St Mary's Churchyard, Lewisham	
River Quaggy at Manor House Gardens	Site name Changed from 'Manor House Gardens'
Mayow Park	Boundary

	Extended along the southwest corner
Spring Brook at Downham Playing Fields	Boundary Extended along all existing boundaries
River Ravensbourne and Brookmill Park	
Senegal Railway Banks	
Railside Land: New Cross to St Johns Railsides	
Nunhead Cutting	
Brockley to St John's Railsides	
St Johns to Lewisham Railsides (St Johns Station)	Boundary Extended around station
Lewisham Railway Triangles	
Lewisham to Blackheath Railsides	Boundary Extended along north and southern boundary.
Hither Green Railsides (Hither Green Station)	
Hither Green Sidings	
Railsides South of Sydenham	
Lower Sydenham Station Meadow.	Site name Changed from 'Lower Sydenham Station Allotments' Boundary Extended at northern end
New Cross and New Cross Gate railsides	Boundary Extended to include railway sidings
Mountsfield Park	
Chinbrook Community Orchard and Allotments	
River Quaggy at Chinbrook Meadows	Site name Changed from 'Chinbrook Meadows'.
River Ravensbourne at Ladywell Fields	Site name Changed from 'Ladywell Fields' SINC status Upgraded from Local to Borough importance
River Quaggy and Manor Park	Boundary Extended along northern boundary and reduced along southern boundary SINC status Upgraded from Local to Borough importance
River Thames Tidal Creek at Creekside Education Centre	Site name Changes from 'Creekside Education Centre' SINC status Upgraded from Local to Borough importance
Bridgehouse Meadows Railsides	Site name Changed from 'Bridge House Meadows'

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	<p>Boundary Extended in the southwest corner and at eastern boundary</p> <p>SINC status Upgraded from Local to Borough importance</p>
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Sites of local importance	
Site name	Proposed changes to Policies Map
Brookmill Nature Reserve (Local Nature Reserve)	Site name Changed from 'Brookmill Nature Reserve'
Besson Street Community Garden Sydenham Cottages Nature Reserve	Boundary Extended at northern boundary and south west corner.
Folkestone Gardens	
Whitefoot Recreation Ground	
Queenswood Nature Reserve	Boundary Extended along northern boundary
Rainsborough Avenue Embankments	Boundary Boundary amended with a reduction in overall area
Sayes Court Park Iona Close Orchard	Boundary Amended to exclude an area along the western boundary
Sedgehill Allotments	
Brockley Hill Park	
Sydenham Wells Park	
Hilly Fields	
Eliot Bank Hedge and Tarleton Gardens	Boundary Extended along most boundaries
River Ravensbourne at Peter Pan's Garden & Southend Pond	Site name Changed form 'Southend Pond' Boundary Extended along northern boundary
Albion Millennium Green	
Pepys Park Nature Area	Boundary Extended in north-east corner
St Paul's Churchyard and Crossfield Street Open Space	Boundary Extended along northern boundary
Telegraph Hill Park	
Bromley Hill Cemetery	Boundary Extended in the northern corner.
Gilmore Rd Triangle	Boundary Extended at north northern boundary.

Schedule 9: Sites of geodiversity interest

Table 21.4 Table showing sites of geodiversity interest

Site type	Site name	Location
Regionally Important Geological Site	Beckenham Place Park	Bellingham
Locally Important Geological Site	Old Gravel Pit	Blackheath

Commented [NE469]: Additional Schedule required for Sites of Geodiversity interest

Schedule 10: Bakerloo line extension safeguarding Direction area

Commented [NE470]: Respond to consultation – the Direction should be included in the plan for information

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Appendix B

Consultation Summary – Local Plan: Main Issues and Preferred Approaches

1. Background

- 1.1. This briefing note provides a high level summary of feedback received from the public consultation on the draft Lewisham Local Plan: Main Issues and Preferred Approaches document (Regulation 18 stage).
- 1.2. The public consultation on the draft Local Plan was held from 15th January to 11th April 2021. More than 1,400 local residents, businesses, community groups, landowners and organisations responded. This resulted in several thousand detailed comments on the plan proposals covering a range of policy topic areas.
- 1.3. Consultation feedback has been considered by officers and is being used to inform the draft 'Proposed Submission' version of the Local Plan (Regulation 19 stage). This revised plan will be subject to a further round of public consultation before the plan is submitted to the Secretary of State for Levelling Up, Housing and Communities for public examination.
- 1.4. A full Consultation Statement will be published alongside the Local Plan 'Proposed Submission' document. This will include a detailed schedule of comments received at the Regulation 18 stage and how these have been taken into account.

2. Consultation feedback

- 2.1. The following tables provide a snapshot of the key issues raised during the public consultation. These issues are organised around each of the main parts/sections of the draft Local Plan.
- 2.2. The focus here is on points of public concern or contention rather than areas where there is general support for the proposals. In addition, the tables provide a short commentary on actions required by officers to address consultation comments as work on the plan progresses.

Part 1: Planning for an Open Lewisham	
Comments	Reflections and next steps
Vision and objectives	
Broadly supported but some have questioned if the plan is deliverable , given limited financial resources available to Council and stakeholders post-Covid.	The Local Plan is required to viability tested in order for the Council to demonstrate that it is deliverable. The Council has prepared a draft Viability Assessment which will be updated to take account of the revised policies.

	As a local planning authority, the Council is setting the long-term planning and investment framework for the Borough. The Council is just one of many stakeholders and partners that will support the plan's delivery.
Spatial strategy	
<p>Challenge to the growth assumptions underpinning the plan, recognising it was prepared prior to peak of Covid.</p> <p>There are also comments from people who are not supportive of further development and growth in the borough.</p>	<p>The housing target is set by the London Plan (2021) and the Council is required to demonstrate how this will be met – the borough's new target of 1,667 net homes per year is up 20% from the previous target. We are clear that this is a challenging target but the Local Plan will help to ensure that growth is well managed and appropriately supported by infrastructure.</p> <p>The Local Plan and Infrastructure Delivery Plan will be updated taking account of new technical evidence. This includes the GLAs latest population projections, which notably continue to indicate significant growth over the long term. A new retail study and Strategic Housing Market Assessment have also been commissioned.</p>
<p>More clarity sought on what happens if the Bakerloo line extension is delayed or is not delivered within the plan period.</p>	<p>The Local Plan assumes the BLE will not be delivered. This is a soundness matter likely to be raised at the plan's examination. At the same time the plan supports the business case for the BLE, safeguards land/sites needed, and provides flexibility to respond to its delivery.</p> <p>The plan will be amended to be clear that the Council's priority is to secure the BLE – but also provide assurances about how growth will be managed in its absence.</p>
<p>More detail sought about the London Plan Opportunity Areas and how growth / investment will be managed within them. The A21 and A2 Corridors are well captured but there is concern about lack of detail on Deptford Creekside.</p>	<p>Officers consider that the plan has addressed Deptford Creekside, but acknowledge that the Local Plan could be amended to provide more clarity on the London Plan Opportunity Area objectives.</p>

Part 2: Managing development

Comments	Reflections and next steps
High quality design	
<p>Many concerns about harm to and/or loss of local character – this was a common theme raised across most policy areas, not just design.</p> <p>These concerns are mainly centred on building heights and density, with many opposing tower blocks</p>	<p>The London Plan seeks to facilitate higher density development across London in order to meet the Capital's housing needs. It also makes clear that tall buildings are part of the solution to the housing crisis – it directs boroughs to identify locations suitable for tall buildings and to set threshold heights in their Local Plans.</p>

<p>(e.g. citing harmful cluster of buildings in Lewisham town centre, emerging Leegate proposals, etc.).</p> <p>More clarity sought around locations appropriate for tall buildings and guidance on heights in different areas, with many people seeking that the Local Plan impose restrictions.</p>	<p>The Local Plan is informed by a Characterisation Study, which was subject to public consultation. This set out areas which are most appropriate for accommodating growth/transformation, and those where existing character should be retained/reinforced.</p> <p>In response to consultation feedback, further work on the Tall Buildings Study has been commissioned. The study will be used to set threshold building heights for different areas of the borough – this will be a more prescriptive approach than included in the Regulation 18 plan, and one that better aligns with the direction of the London Plan.</p> <p>The Council is also preparing a suite of planning guidance to help ensure that higher density development responds positively to the local context. This includes the Small Sites SPD, A21 Development Framework, and Catford Town Centre Framework.</p>
<p>Heritage</p>	
<p>As above, many concerns about harm to and/or loss of heritage assets and historical character.</p>	<p>The Local Plan provides a refreshed suite of policies to help ensure the preservation and enhancement of heritage assets. Historic England has submitted representations to the Local Plan and these will be taken into account, along with wider public feedback.</p> <p>The Council's Conservation Team is currently preparing detailed appraisals of selected site allocations where Historic England has made specific comments. The appraisals will be used to inform the plan policies (e.g. development requirements and design guidelines).</p>
<p>Suggestions for residential areas to be designated as Areas of Special Local Character.</p>	<p>Areas of Special Local Character are non-designated heritage assets. The Local Plan will be amended to provide more clarity around current ASLCs. It will also provide details on the Council's process for identifying additional ASLCs.</p>
<p>Support for policy approaches but suggest that more needs to be done about planning enforcement.</p>	<p>Planning enforcement is outside the scope of the Local Plan.</p>
<p>Housing</p>	
<p>Support for genuinely affordable housing and 50% target. However doubts remain that new housing will be affordable to local people – Council not currently meeting its 50% target so how will new Local Plan change this.</p>	<p>The Local Plan is clear that the Council's priority is for more genuinely affordable housing, based on local income levels.</p> <p>The London Plan 'viability tested' route means that developments providing at least 35% affordable housing do not need to submit a viability assessment, and are acceptable in principle in</p>

	<p>terms of provision. Not all private developments will therefore deliver on the 50% target.</p> <p>The public sector and registered providers will also bring forward schemes that boost delivery of genuinely affordable housing (e.g. estate renewal and regeneration).</p> <p>The Local Plan is seeking for first time that minor housing schemes (less than 10 units) make a financial contribution towards affordable housing. This money can be pooled to support the Council's homebuilding programme.</p> <p>The Council is preparing an update to the Strategic Housing Market Assessment (SHMA) to ensure evidence of housing need is robust and up-to-date.</p>
<p>More family homes are needed not 1 and 2 bedroom flats. This links in with opposition tower blocks, and position that high rises without garden space are inappropriate for families.</p> <p>Reflections on Covid-19 lockdown and what makes suitable living space.</p>	<p>The Local Plan seeks to restrict the conversions of family homes unless a family sized unit (3+ bed) is retained.</p> <p>The Local Plan will be updated to set a target housing size mix for new affordable housing (i.e. number of bedrooms). The mix will be informed by the SHMA update.</p> <p>In addition, the Local Plan will be amended to make clearer the need for major housing developments to provide a reasonable proportion of family units. This will be considered on a case-by-case basis taking into account viability.</p> <p>The Local Plan adopts the London Plan housing standards, which reflect the nationally described space standards.</p>
<p>Local plan needs to set a 10-year target for gypsy and traveller accommodation as per London Plan.</p> <p>Petition opposing new gypsy and traveller site at Poole Court.</p>	<p>The Local Plan will be amended to include a 10-year target based on the Council's Gypsy and Traveller Needs Study. The target is 6 pitches which the Poole Court site allocation makes provision for.</p> <p>There is a significant risk that the Local Plan will be found unsound if provision for travellers is not made.</p>
Economy and culture	
<p>A wide range of views on the employment land strategy, particularly on sites proposed for mixed-use or co-location of uses.</p> <ul style="list-style-type: none"> • Assurances that there will be no loss of industrial capacity • Developers/landowners broadly supportive, several already in pre-app on these sites 	<p>The London Plan provides a direction for boroughs to intensify uses and development on industrial land.</p> <p>The Local Plan identifies sites for employment-led, mixed-use development. This will incentivise redevelopment of sites for modern business space, new homes and public realm improvements. The approach is also underpinned by place-making and will support the spatial strategy.</p>

<ul style="list-style-type: none"> • Some local business owners / leaseholders concerned about loss of business or displacement • The Local Plan needs to respond to new planning legislation, including changes to the Use Classes Order 	<p>The Local Plan will be amended to clarify how it will deliver new workspace whilst ensuring there is no net loss of industrial capacity in the borough. It will also need to respond to recent changes to the Use Classes Order, which have widened the scope of permitted development rights (i.e. easier to change use between certain types of business uses, including office and light industrial uses).</p> <p>Officers will review the consultation responses and consider the need to amend site allocation boundaries or development requirements.</p> <p>Officers will continue to meet with the GLA to discuss necessary amendments for conformity with London Plan.</p>
<p>The Local Plan does not reflect the key role that Lewisham plays in London's Central Activity Zone (CAZ). This is especially in terms of logistics, last mile delivery, etc. for central London economy.</p>	<p>The Local Plan will be amended to refer CAZ and Lewisham's role in supporting it. This will mainly be through support for complementary commercial activities in designated Strategic Industrial Locations.</p>
<p>Questions about the robustness of retail floorspace needs figures, given impact of Covid-19 and Brexit and acceleration of online shopping</p>	<p>The Regulation 18 Local Plan was informed by a 2019 Retail Study, which indicated only modest growth in retail floorspace.</p> <p>However in response to consultation feedback a new Retail Impact Assessment and Town Centre Trends study has been commissioned - interim findings suggest a significant reduction in need for retail floorspace over the plan period. The final study will inform the revised Local Plan.</p>
<p>The plan does not account for changes to permitted development rights.</p> <p>The Use Classes Order has been updated, with a new Class E (covering most non-industrial commercial uses). Permitted Development rights now make it easier to change from Class E uses (shops, offices, etc.) to housing. It is also easier to change business uses with Class E.</p>	<p>The Local Plan town centre policies will need to be amended taking into account the changes to the Use Classes Order and expanded Permitted Development rights. The approaches for managing uses in the Council's adopted plan and draft Local Plan will need to change quite significantly as a result.</p> <p>Separate from the Local Plan officers will be undertaking preliminary work to scope the case for an Article 4 Direction, which may be needed to protect the business function of employment areas and town centres.</p>
<p>Cultural quarters and night-time economy hubs – whilst broadly supported there were some concerns about impact on local amenity, particularly in the evening and night-time.</p>	<p>The draft Local Plan already includes policies around the protection of local amenity. Officers will consider the scope to strengthen these policies.</p>
<p>Community infrastructure</p>	
<p>Concerns that the Local Plan does not make sufficient provision for</p>	<p>The Infrastructure Delivery Plan sits alongside the Local Plan and has been prepared by officers</p>

<p>new community facilities to support growth.</p> <p>This is coupled with concerns about the future of existing facilities – lack of investment / falling into disrepair, closures, etc.</p> <p>Many comments on site allocations which include existing health care facilities (where the Local Plan supports mixed-use redevelopment but only where suitable replacement provision of the facility is made, or where its rationalisation is linked to a published asset management strategy).</p> <p>NHS property services have also identified an additional site they would like considered for redevelopment, with re-provision of facilities.</p>	<p>liaising with providers – including NHS, school place planning team, etc. At this time, officers consider that sufficient provision has been made for the infrastructure required to support the levels of growth planned.</p> <p>The draft IDP will be updating taking account of GLAs latest population projections, new technical evidence and information provided by stakeholders. This will be considered as work on the plan progresses.</p> <p>Officers will investigate opportunities for the Local Plan to provide more specific parameters around community facilities in the site allocations. Where there is information available from a Council-led asset management review, this will be taken into account.</p> <p>All sites submitted to the latest ‘call for sites’ will be considered for inclusion in the plan, in line with our site screening methodology.</p>
Green infrastructure	
<p>There was a significant amount of interest in this section of the plan. A high volume of comments requesting:</p> <ul style="list-style-type: none"> • More and stronger protections for green spaces and nature sites • Clarifications around the terms ‘open space’ and ‘green space’ and the level of protection afforded to each • Requests for additional sites to be designated and protected • New evidence prepared so it is up-to-date 	<p>The draft Local Plan was informed by a number of studies including: Open Space Assessment, Sites of Importance for Nature Conservation Review, Metropolitan Open Land (MOL) Review.</p> <p>In response to the public consultation the Council has commissioned an additional Open Spaces Study and MOL Review Update. These are focussed study updates where the scope has been set in response to the main issues raised through the consultation. The final studies will be used to inform the Local Plan.</p>
<p>More detail required about how the plan will deliver Biodiversity Net Gain (BNG).</p>	<p>The Local Plan has a dedicated section on Green Infrastructure with a refreshed suite of policies, includes new requirements for urban greening and the provision for new green space on large site allocations (e.g. Surrey Canal Triangle, Convoys Wharf, Bell Green Retail Park).</p> <p>Officers will review the draft Local Plan and seek to strengthen approaches on BNG and to provide more clarity on how this will be achieved.</p>
Sustainable design and infrastructure	
<p>Comments that the Local Plan does not go far enough in</p>	<p>Transport and housing are the two highest contributors to carbon emissions in the borough</p>

<p>responding to the climate emergency. This is particularly in respect of sustainable design standards and reducing carbon emissions.</p>	<p>(more than half of emissions from energy use from homes).</p> <p>The Local Plan provides a significant step change towards discouraging / reducing need for private car use – this is covered in the transport section.</p> <p>For new housing and commercial development, the Local Plan aligns with the London Plan requirements on energy efficiency, carbon reduction, cooling, etc. A balance will need to be struck to ensure the Local Plan requirements do not significantly impact on development viability, for example, compromising the Council’s ability to secure genuinely affordable housing, infrastructure and public realm enhancements.</p> <p>In response to consultation feedback and Member interest, the Local Plan will be amended with new policies on sustainable retrofitting and embodied carbon emissions (which are separate from the ‘operational’ emissions covered by the London Plan).</p> <p>However it must be recognised that the Local Plan has very limited scope to intervene with existing housing stock - for example, we cannot require domestic refurbishments to a specific standard, unless alterations are such that they require planning consent. Many retrofitting measures will be permitted development, or not development at all (e.g. energy efficient fixtures). Grant funding for retrofitting will also be an important consideration, which the Local Plan has no control over.</p> <p>Officers have been and will continue to liaise with colleagues in the Climate Resilience team to ensure alignment with the Council’s Climate Change Action Plan.</p>
<p>Some consider that there are many loopholes for developers to exploit i.e. carbon offsetting, loosely worded policies, etc.</p>	<p>The London Plan recognises that feasibility issues may prevent zero-carbon developments, so offsetting is permitted. The Local Plan makes clear that carbon offsets should be used in exceptional circumstances, with funds secured to be reinvested into local green projects. Our Carbon Costing is currently higher than the price set in the London Plan guidance, and we will seek to carry this forward subject to viability.</p> <p>In addition, officers acknowledge that terminology used in the policies such as: development proposals ‘should’... or ‘will be expected to’... could be strengthened to make the Local Plan more definitive, i.e. ‘must’ or ‘will be required to’. The plan will be amended as such, wherever possible.</p>

Comments from statutory consultees (e.g. Environment Agency, Thames Water) to help strengthen policies on flood risk management, air quality, etc.)	These comments will be addressed by officers as work on the plan progresses.
GLA has raised concerns about proposals for waste management .	<p>We will continue to liaise with GLA to ensure conformity with London Plan.</p> <p>Lewisham forms part of the South East London Joint Waste Management Group. This group has a planning policy function in delivering waste self-sufficiency – constituent boroughs pool their waste facility capacity to meet the London Plan waste apportionments. Lewisham has a key role with SELCHP.</p>
Transport and connectivity	
High volume of comments received on Low Traffic Neighbourhoods , both in favour and opposition.	LTNs are outside the scope of the Local Plan.
<p>There is overall support for Healthy streets and encouraging modal shift – i.e. discouraging private car use. However, there are also concerns about these approaches where areas are poorly served by public transport.</p> <p>Also, there is a question as to how realistic that Healthy Streets can be delivered on TfL roads (i.e. A-roads).</p> <p>Some suggest plan is ageist by not recognising mobility needs of older people.</p>	<p>The London Plan sets a long-term target for 90% of all journeys made in inner-London to be made by walking, cycling and public transport. The Local Plan has to support this – the Council must be aspirational but also pragmatic in its approach.</p> <p>It is acknowledged that the Council will need to work with GLA and TfL on complex projects to support the Healthy Streets approach e.g. on A-roads, major junctions and key arterial routes. The Council's Local Implementation Plan sets out key projects that will help to support the London Mayor's Transport Strategy. CIL funding and planning contributions can support their delivery.</p> <p>The Council will also continue to lobby the London Mayor and TfL to extend ULEZ to cover whole of borough – this will support Healthy Streets principles on A205.</p> <p>Officers disagree that the plan is ageist. The Local Plan broadly seeks to ensure development is designed to create more inclusive neighbourhoods, and investment in public transport/public realm helps to improve access to local facilities and services.</p>
Transport for London objects to proposals for local car parking standards - the Local Plan is more relaxed than London Plan on car-car-free development	The Local Plan will be unsound if it is not in general conformity with the London Plan. The parking standards will need to be reviewed and updated to ensure conformity, whilst responding to local circumstances wherever possible.

Part 3 – Places and neighbourhoods (including site allocations)

Comments	Reflections and next steps
Central Area	
<p>Most comments raise concerns about overdevelopment of Lewisham and Catford major town centres, opposition to tower blocks, adverse impact on local character, etc.</p>	<p>Lewisham and Catford major centres fall within a London Plan opportunity area, and Local Plan has to reflect this. Growth and managed change within and around the centres are a key part of the spatial strategy.</p> <p>Many sites in Lewisham town centre already have planning consent, so development parameters have been set. The site allocations are included in the plan to help the Council to demonstrate that it can meet its housing targets.</p> <p>Local Plan sets the development strategy for Catford – the Catford town centre framework will support its implementation.</p> <p>As per Part 2 table above – further work on the Tall buildings study has been commissioned and will be used to inform policies on building heights.</p>
<p>Consider that there is a lack of focus on Hither Green. Request that more emphasis given to priorities for area west of Hither Green station (including commercial uses along Springbank Road) and addressing severance caused by the railway.</p>	<p>Part 3 area objectives / policies will be revised to ensure this is better addressed.</p>
<p>Site allocations with high volume of responses:</p> <ul style="list-style-type: none"> • House on the Hill – density, height, impact on amenity • Aldi, Rushey Green – density, height, impact on amenity • Lewisham / Catford town centre sites – density, height, loss of local character, traffic impacts 	<p>Feedback to be considered as work on plan progresses.</p>
North Area	
<p>Requests for the Local Plan to address polluting industry and lorry movements in area.</p> <p>This includes the future of SELCHP - request that alternative use is found owing to pollution and inappropriate use in residential area.</p>	<p>The North Area includes London Plan Strategic Industrial Locations (SIL) which must be safeguarded for commercial and industrial uses. The Local Plan includes refreshed suite of policies to help ensure that local amenity is protected – this includes policies on freight movement.</p> <p>For Locally Significant Industrial Sites (LSIS) in the area, the Local Plan is advocating employment-led mixed use</p>

	<p>redevelopment, which will help to improve the environmental quality of sites in Creekside.</p> <p>SELCHP is critical for London Plan conformity and meeting European Directives for waste net self-sufficiency. The facility provides capacity which enables to Borough to meet its prescribed 'waste apportionment' figure.</p> <p>In addition, the London Plan directs the Local Plan to safeguard existing waste management sites. The loss of facilities can only occur when replacement provision is found elsewhere in London – which is unlikely at the current time.</p> <p>In the interim, the Local Plan seeks opportunities for decentralised energy network development linked to the facility.</p> <p>In response to consultation feedback, officers will review the scope to strengthen requirements for development proposals involving existing facilities (e.g. alterations) to ensure their environmental performance is improved.</p>
Suggestion that play space and healthy school routes need to be given more prominence	The Local Plan introduces a new policy on play and informal recreation that applies across the Borough. It seeks targeted improvements in areas identified as being deficient in access to provision, including parts of the north area.
Comments that Local Plan should focus on re-opening Canal Approach towpath	This is picked up in the new Lewisham Links policy, which helps give effect to the North Lewisham Links project.
Concern there is no plan to increase green space in the area – improved access to riverside and a riverside park should be promoted.	The Local Plan makes provision for new publicly accessible green and open spaces, including by opening up the Riverside and extending the Thames Path e.g. Surrey Canal Walk, improvements at Surrey Canal Triangle, Convoys Wharf.
<p>Site allocations with high volume of responses:</p> <ul style="list-style-type: none"> Hatcham works – concern about overdevelopment, impact on neighbouring homes Albany Theatre – concern over loss 	Feedback to be considered as work on plan progresses.
East Area	
Whilst support for regeneration of Lee Green district centre , there are concerns about redevelopment of town centre sites (Leegate Centre, Sainsbury's and BMW). Objections to	Land use principles for Leegate have been established by the extant planning consent. A new planning permission is at pre-application stage, and this will be

<p>emerging Galliards scheme around harm to local character, overdevelopment (density, height) and lack of supporting community infrastructure.</p>	<p>considered against adopted policies should it be submitted.</p> <p>The Local Plan sets clear the development guidelines for these sites to support comprehensive regeneration of the town centre. These will be reviewed in light of feedback received.</p> <p>As per Part 2 table above – further work on the Tall buildings study has been commissioned and will be used to inform policies on building heights.</p>
<p>The Local Plan should reflect community aspirations for an Urban National Park in east area, in line with neighbourhood plan.</p> <p>Many seeking greater protection and enhancement of open spaces.</p>	<p>The Local Plan includes a policy dealing specifically with linear network of green infrastructure in east area – this was informed by and intended to align with the neighbourhood plan. However ‘urban national park’ is not a land-use designation that officers consider can be included in the plan.</p> <p>As set out in Part 2 table above – further work on Open Spaces / MOL has been commissioned and will be used to inform policies on green infrastructure.</p>
<p>Concerns about designation of Blackheath Village as night-time economy hub – what does this mean in practice and what controls will be in place to protect amenity.</p>	<p>The Local Plan seeks to recognise and build on visitor economy in Blackheath. There are policies dealing with protection of amenity.</p>
<p>Site allocations with high volume of responses:</p> <ul style="list-style-type: none"> Lee Green town centre sites (Leegate, Sainsbury’s and BMW) – objection to overdevelopment (density and height), lack of community facilities 	<p>Feedback to be considered as work on plan progresses</p>
South Area	
<p>Broad support for regeneration / redevelopment of retail parks at Bell Green and Lower Sydenham.</p> <p>However comments suggest that more needs to be done to improve walking and cycling environment – car dominance at Southend Land, the gyratory, etc.</p> <p>Local residents requesting a ‘community-led’ masterplan.</p> <p>Concerns about loss of local jobs by redevelopment of Sainsbury’s and other retailers.</p>	<p>Local Plan will set the strategic development framework for the area and the public is being consulted through this process.</p> <p>The Council agrees that a masterplan would be beneficial. It has carried out an initial visioning exercise consultation with local community groups.</p> <p>Rationalisation of retail parks / car parking, will allow for a new town centre, with more traditional street based format. Officers envisage businesses like Sainsbury’s can continue operating (ground floor uses with residential above)</p>

	and will therefore continue to provide local employment opportunities.
Lack of focus on Downham .	Part 3 area strategy / policies will be revisited to better address Downham.
Concern about loss of community facilities in this part of the borough. Also many comments regarding Bridge Leisure Centre.	As set out in Part 2 table above – provision of community facilities will be addressed through review of the Infrastructure Delivery Plan.
Site allocations with high volume of responses: <ul style="list-style-type: none"> • Beadles Garage, Avondale Road – density, height • Sydenham Green group practice – concern about loss of facility • Bestway Cash and Carry – deliverability issues, impact on local amenity 	Feedback to be considered as work on plan progresses.
West Area	
Would like to see the community-led masterplan for Forest Hill town centre incorporated into, or given weight, through the plan.	The community-led masterplan has been considered by officers and many of the key principles have been taken forward in the draft Local Plan. However some of the proposals are considered by officers to be unfeasible at the current time – for example, works involving the A205.
Willow Way LSIS / Upper Kirkdale local centre – general support for renewal of employment land and town centre revitalisation. However, high volume comments opposing loss of Dartmouth Motors in the LSIS.	Feedback to be considered as work on plan progresses.
Consider that Drakefell Road and Gellatly Road are ignored or overlooked – more action on this corridor is needed.	Part 3 area strategy / policies will be revisited to better address
Lack of focus on Ladywell .	Part 3 area strategy / policies will be revisited to better address
Site allocations with high volume of responses: <ul style="list-style-type: none"> • Willow Way LSIS – loss of Dartmouth Motors MOT • Havelock House – loss of green space, amenity • Jenner Health Centre – loss of health facility 	Feedback to be considered as work on plan progresses.

Part 4 – Delivery and monitoring

Comments	Reflections and next steps
Infrastructure funding	
Suggestion to review and update the Planning Obligations SPD alongside the preparation of the local plan. This will ensure the approach to securing S106 is consistent with legislation, national policy and that a	Officers are currently undertaking work to scope an update to the Planning Obligations SPD.

document is ready-made once new Local Plan comes into force.	
Monitoring	
Suggestions from statutory consultees and wider public for additional monitoring and performance indicators to be included.	Monitoring framework will be reviewed and updated where appropriate.

Part 5 – Schedules and appendices

Comments	Reflections and next steps
Schedules	
All comments refer to land-use designations re open spaces and nature sites e.g. suggestions for additional sites to be included, level of protection provided by the designation, etc. (as per the Part 3 - Green Infrastructure section above).	Schedules will be updated in line with recommendations from new studies e.g. Open Space Study and MOL review

General comments

Comments	Reflections and next steps
General	
A number of comments voicing disapproval with the consultation process , including the decision to consult at a time when Covid social distancing restriction were in place	<p>The consultation has been carried out in accordance with the Council's adopted Statement of Community Involvement.</p> <p>The Secretary of State issued a statement making it clear that local plan production should not be unduly delayed during Covid-19. The Government has a target for all local authorities to have adopted up-to-date local plans by 2023. In addition, there are key risks in delaying the plan programme, which are set out in the SDSC cover report.</p>
<p>A wide range of comments were received which officers consider are outside the scope of the local plan (i.e. use and development of land), for example:</p> <ul style="list-style-type: none"> - Park management / maintenance - Litter - Traffic (rat runs) - On-street parking and CPZs - LTNs - Anti-social behaviour - Cost of private housing 	All such comments will be collated by officers and circulated to relevant Council Service Areas for their consideration and action.

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Sustainable Development Select Committee

Select Committee Work Programme Report

Date: 23 November 2021

Key decision: No.

Class: Part 1

Ward(s) affected: Not applicable

Contributors: Assistant Chief Executive (Scrutiny Manager)

Outline and recommendations

This report gives Committee members an opportunity to review the Committee's work programme and make any changes required.

The Committee is asked to:

- To review the work programme attached at **appendix B**.
- Note the four strategic themes of the borough's recovery plan: 'Future Lewisham'
- To consider the items for the next meeting and specify the information required.
- To review the forward plan of key decisions at **appendix E** to consider whether there are any items for further scrutiny.

Timeline of decision-making

Work Programme 2021-22 – draft agreed on 30 June 2021

Work Programme 2021-22 – agreed by Business Panel 20 July 2021

1. Summary

- 1.1. The Committee proposed a draft work programme at the beginning of the municipal year. This was considered alongside the draft work programmes of the other select committees and agreed by Business Panel on 20 July 2021.
- 1.2. The work programme should be reviewed at each meeting to take account of changing priorities.

2. Recommendations

2.1. The Committee is asked to:

- To review the work programme attached at **appendix B**.
- Note the four strategic themes of the borough's recovery plan: 'Future Lewisham'
- Consider the items for the next meeting and specify what evidence is required, including being clear about the information the committee wishes to be included in officer reports.
- To review the forward plan of key decisions at **appendix E** to consider whether there are any items for further scrutiny.

3. Work Programming

3.1. When reviewing the work programme the Committee should consider the following:

3.2. The Committee's terms of reference (Appendix A).

3.3. Whether any urgent issues have arisen that require scrutiny. If so, consider to the prioritisation process (Appendix C) and the Effective Scrutiny Guidelines (Appendix D)

3.4. Whether a committee meeting is the most effective forum for scrutinising the issue. For example, would a briefing be more appropriate?

3.5. Whether there is time to consider the item - could any work programme items be removed or rescheduled?

3.6. Whether the item links to the priorities set out in the [Corporate Strategy for 2018-2022](#):

- [Open Lewisham](#) - Lewisham is a welcoming place of safety for all, where we celebrate the diversity that strengthens us.
- [Tackling the housing crisis](#) - Everyone has a decent home that is secure and affordable.
- [Giving children and young people the best start in life](#) - Every child has access to an outstanding and inspiring education, and is given the support they need to keep them safe, well and able to achieve their full potential.
- [Building an inclusive local economy](#) - Everyone can access high-quality job opportunities, with decent pay and security in our thriving and inclusive local economy.
- [Delivering and defending: health, social care and support](#) - Ensuring everyone receives the health, mental health, social care and support services they need.
- [Making Lewisham greener](#) - Everyone enjoys our green spaces, and benefits from a healthy environment as we work to protect and improve our local environment.
- [Building safer communities](#) - Every resident feels safe and secure living here as we work together towards a borough free from the fear of crime.

3.7. The Committee should also note and take into account the four strategic themes of the borough's Covid-19 recovery plan, 'Future Lewisham', which support what we want for every single resident and that we know are what we need to focus on locally:

3.8. An economically sound future

We are working to get the borough back in business, with a future where everyone has the jobs and skills they need to get the best that London has to offer.

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We are a borough with businesses that are adaptable and prepared for change, a thriving local economy that sees 'local' as the first and best choice, with digital inclusion at the heart of our plans. We do all we can to support residents into jobs that pay fairly and provide families with the opportunities and security they deserve.

3.9. **A healthy and well future**

Good health and wellbeing should be something we can all depend on, something that is equally accessible to everyone.

We know this is much wider than 'medicine' and the NHS. Our health and well-being is also dependent on our housing, the air we breathe, our support networks and more. We will make sure to pay as much attention and invest as much effort into improving these wider factors and taking action on inequality at every turn. Rectifying health inequalities and developing good mental health & wellbeing for everyone drives what we do.

3.10. **A greener future**

Our next steps will be our greenest yet, continuing our efforts to preserve our climate for future generations and ensuring everyone can enjoy the place we call home.

We will capture and build on the best of what we saw from the increase in walking and cycling locally, and all the other ways our environment benefitted from behaviour changes over the last year. We will nurture and protect the place we call home so that we can continue to appreciate its benefits for generations to come.

3.11. **A future we all have a part in**

We work together as one borough, within our communities and identities, to harness the power of volunteering and community spirit that has helped get us through the last year.

We will work alongside our strongest asset – our community – to strengthen and enhance our borough for everyone. We achieve more together and being connected and taking an active role in our borough benefits us all. Our year as Borough of Culture 2022 will be Lewisham's best year yet, celebrating our fantastic part of London and providing opportunities for everyone to connect and get involved in our local community.

3.12. The Committee is recommended to schedule **two substantive items per meeting**, leaving space available for Mayor and Cabinet responses and other urgent business as the need arises throughout the year.

3.13. Provision is made for meetings to last for up to 2.5 hours, but the committee should aim to **manage its business within 2 hours**. In exceptional cases the committee may decide to suspend standing orders and extend the meeting for a further 30 minutes to conclude any urgent business.

4. The next meeting

- 4.1. The following items are scheduled for the next meeting. For each item, the Committee should clearly define the information and analysis it wishes to see in officer reports.

Agenda Item	Review type
Budget cuts	Standard item
Implementation of the transport strategy: walking, cycle strategy and health neighbourhoods	Policy development

5. Referrals

- 5.1. Below is a list of the referrals the Committee has made in this municipal year.

Referral title	Date of referral	Date considered by Mayor and Cabinet	Response due at Mayor and Cabinet	Response due at Committee
Emission based short-stay parking and motorcycle parking charges	30 Jun 21	14 Jul 21	Tbc	Tbc
Catford regeneration masterplan	30 Jun 21	14 Jul 21	8 Dec 21	18 Jan 22
Response to Mayor and Cabinet on - Railway Children Urban National Park: neighbourhood plans and environmental protection	15 Sep 21	06 Oct 21	Tbc	Tbc
A21 development framework	15 Sep 21	06 Oct 21	Tbc	Tbc

6. Financial implications

- 6.1. There are no direct financial implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme will have financial implications and these will need to be considered as part of the reports on those items.

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7. Legal implications

- 7.1. In accordance with the Council's Constitution, all scrutiny select committees must devise and submit a work programme to the Business Panel at the start of each municipal year.

8. Equalities implications

- 8.1. The [Equality Act 2010](#) (The Act) legally protects people from discrimination in the workplace and in wider society. It replaced the previous anti-discrimination laws with a single act, making the law easier to understand and strengthen protection in certain situations. It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 8.2. The Act also imposes a public sector equality duty. This means that in public bodies, of which this Council is designated, they must consider all individuals in carrying out their day-to-day work when shaping policy, in delivering services and in relation to their own employees. It also requires public bodies to:
- Have due regard to the need to eliminate discrimination
 - Advance equality of opportunity
 - Foster good relations between different people when carrying out their activities
- 8.3. The Council recognises diversity is one of its strengths and is committed to creating a more inclusive community. Therefore, having due regard to the Act, is confirmation of the Council's commitment to eliminating all forms of discrimination against any group within the community and to actively promote an equality of opportunity and positive community partnership.
- 8.4. The delivery of the Council's equalities objectives is to be achieved through the delivery of all of the Council's strategies, plans and procedures. As such, all select committees and other scrutiny bodies, when planning their work and scrutinising items, bear in mind the delivery of the Council's equality objectives.
- 8.5. Scrutiny tries to make sure that its work reflects the diversity of Lewisham's communities and that the views of residents are fairly represented in scrutiny processes. Any recommendations arising from scrutiny work support the Council's corporate strategy and reflect the needs of local residents

9. Climate change and environmental implications

- 9.1. There are no direct climate change or environmental implications arising from the implementation of the recommendation in this report. However, in February 2019 Lewisham Council declared a Climate Emergency and proposed a target to make the borough carbon neutral by 2030. The declaration tasked the Sustainable Development Committee with scrutinising the Council's emerging plans. Items on the work programme will have climate change and environmental implications and all reports considered by the Committee should acknowledge this.

10. Crime and disorder implications

- 10.1. There are no direct crime and disorder implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have crime and disorder implications and these will need to be considered as part of the reports on those items.

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11. Health and wellbeing implications

- 11.1. There are no direct health and wellbeing implications arising from the implementation of the recommendations in this report. Items on the Committee's work programme may have health and wellbeing implications and these will need to be considered as part of the reports on those items.

12. Report author and contact

If you have any questions about this report please contact Timothy Andrew (Scrutiny Manager) timothy.andrew@lewisham.gov.uk

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13. Appendix A - Select Committee Terms of Reference

The following roles are common to all select committees:

(a) General functions

- To review and scrutinise decisions made and actions taken in relation to executive and non-executive functions
- To make reports and recommendations to the Council or the executive, arising out of such review and scrutiny in relation to any executive or non-executive function
- To make reports or recommendations to the Council and/or Executive in relation to matters affecting the area or its residents
- The right to require the attendance of members and officers to answer questions includes a right to require a member to attend to answer questions on up and coming decisions

(b) Policy development

- To assist the executive in matters of policy development by in depth analysis of strategic policy issues facing the Council for report and/or recommendation to the Executive or Council or committee as appropriate
- To conduct research, community and/or other consultation in the analysis of policy options available to the Council
- To liaise with other public organisations operating in the borough – both national, regional and local, to ensure that the interests of local people are enhanced by collaborative working in policy development wherever possible

(c) Scrutiny

- To scrutinise the decisions made by and the performance of the Executive and other committees and Council officers both in relation to individual decisions made and over time
- To scrutinise previous performance of the Council in relation to its policy objectives/performance targets and/or particular service areas
- To question members of the Executive or appropriate committees and executive directors personally about decisions
- To question members of the Executive or appropriate committees and executive directors in relation to previous performance whether generally in comparison with service plans and targets over time or in relation to particular initiatives which have been implemented
- To scrutinise the performance of other public bodies in the borough and to invite them to make reports to and/or address the select committee/Business Panel and local people about their activities and performance
- To question and gather evidence from any person outside the Council (with their consent)
- To make recommendations to the Executive or appropriate committee and/or Council arising from the outcome of the scrutiny process

(d) Community representation

- To promote and put into effect closer links between overview and scrutiny members and the local community
- To encourage and stimulate an enhanced community representative role for overview and scrutiny members including enhanced methods of consultation with local people
- To liaise with the Council's ward assemblies so that the local community might participate in the democratic process and where it considers it appropriate to seek the views of the ward assemblies on matters that affect or are likely to affect the local areas, including accepting items for the agenda of the appropriate select committee from ward assemblies.
- To keep the Council's local ward assemblies under review and to make recommendations

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to the Executive and/or Council as to how participation in the democratic process by local people can be enhanced

- To receive petitions, deputations and representations from local people and other stakeholders about areas of concern within their overview and scrutiny remit, to refer them to the Executive, appropriate committee or officer for action, with a recommendation or report if the committee considers that necessary
- To consider any referral within their remit referred to it by a member under the Councillor Call for Action, and if they consider it appropriate to scrutinise decisions and/or actions taken in relation to that matter, and/or make recommendations/report to the Executive (for executive matters) or the Council (non-executive matters).

(e) Finance

- To exercise overall responsibility for finances made available to it for use in the performance of its overview and scrutiny function.

(f) Work programme

- As far as possible to draw up a draft annual work programme in each municipal year for consideration by the overview and scrutiny Business Panel. Once approved by the Business Panel, the relevant select committee will implement the programme during that municipal year. Nothing in this arrangement inhibits the right of every member of a select committee (or the Business Panel) to place an item on the agenda of that select committee (or Business Panel respectively) for discussion.
- The Council and the Executive will also be able to request that the overview and scrutiny select committee research and/or report on matters of concern and the select committee will consider whether the work can be carried out as requested. If it can be accommodated, the select committee will perform it. If the committee has reservations about performing the requested work, it will refer the matter to the Business Panel for decision.

Sustainable Development has specific responsibilities for the following:

- (a) To exercise all the functions and roles of the overview and scrutiny committee in relation to the following matters:
- to examine issues relating to the protection of the environment including 'green' issues such as the conservation of natural resources, air quality, energy efficiency and conservation and/or the reduction of all types of pollution and make recommendations to the Mayor and Cabinet as appropriate;
 - to comment and consult on and make recommendations to the Mayor and Cabinet in relation to the following:
 - i. sustainable development, economic development, business support, employment and training;
 - ii. the formulation of the Council's planning policies, (including the preparation of the Council's Local Development Documents and other local plans for the use and development of land, but excluding planning control and building control functions);
 - iii. highways, parking, traffic and transport, and urban regeneration;
 - iv. the environment including waste disposal, environmental health, street and market trading (but not the granting of licences and related matters);

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v. public protection, refuse collection and disposal, street cleaning, consumer protection, cemeteries and crematoria;

vi generally to examine the performance of the Mayor and Cabinet in relation to the matters listed at (i) to (v) above.

- the review and scrutiny of the exercise by risk management authorities of flood risk management and coastal erosion risk management affecting the area.

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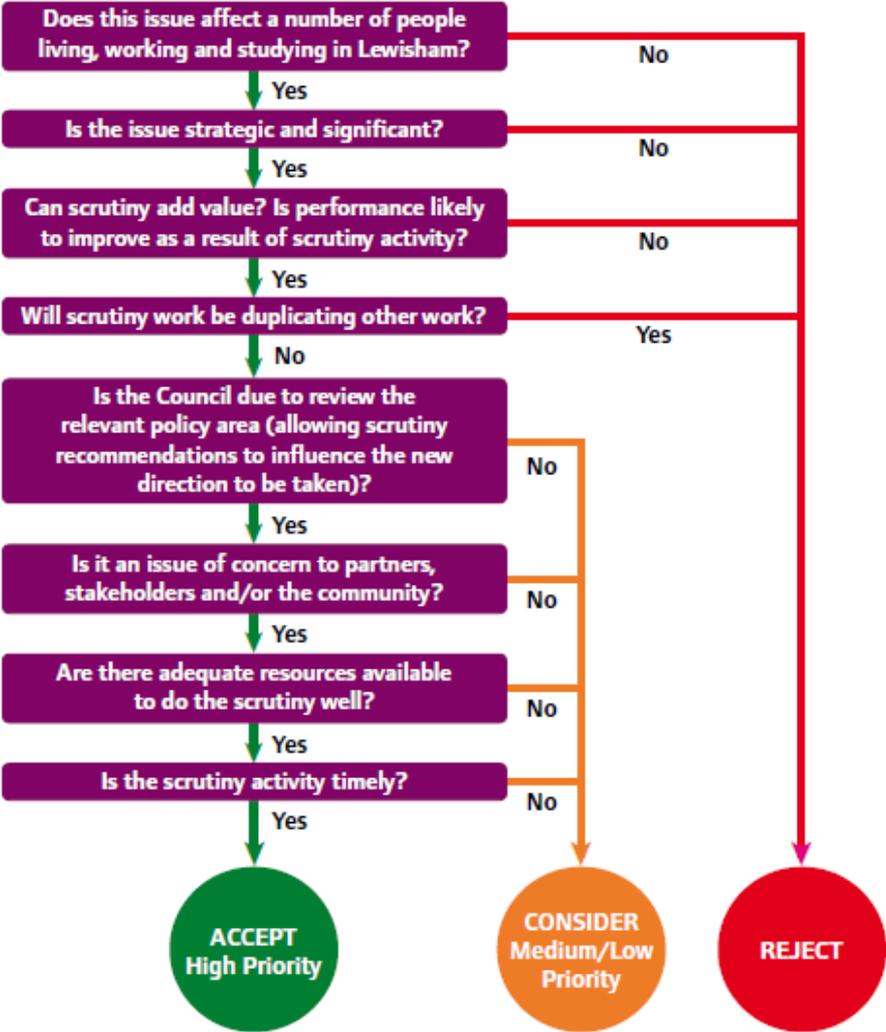
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Appendix C

The flowchart below is designed to help Members decide which items should be added to the work programme. It is important to focus on areas where the Committee will influence decision-making.

Scrutiny work programme – prioritisation process



Appendix D

Effective Scrutiny Guidelines

At Lewisham we:

1. Prioritise

It is more effective to look at a small number of key issues in an in-depth way, than skim the surface of everything falling within scrutiny's remit. We try to focus on issues of concern to the community and/or matters that are linked to our corporate priorities. We only add items to the work programme if we are certain our consideration of the matter will make a real and tangible difference.

2. Are independent

Scrutiny is led by Scrutiny Members. Scrutiny Members are in charge of the work programme and, for every item, we specify what evidence we require and what information we would like to see in any officer reports that are prepared. We are not whipped by our political party or unduly influenced by the Cabinet or senior officers.

3. Work collectively

If we collectively agree in advance what we want to achieve in relation to each item under consideration, including what the key lines of enquiry should be, we can work as a team to question witnesses and ensure that all the required evidence is gathered. Scrutiny is impartial and the scrutiny process should be free from political point scoring and not used to further party political objectives.

4. Engage

Involving residents helps scrutiny access a wider range of ideas and knowledge, listen to a broader range of voices and better understand the opinions of residents and service users. Engagement helps ensure that recommendations result in residents' wants and needs being more effectively met.

5. Make SMART evidence-based recommendations

We make recommendations that are based on solid, triangulated evidence – where a variety of sources of evidence point to a change in practice that will positively alter outcomes. We recognise that recommendations are more powerful if they are:

- Specific (simple, sensible, significant).
- Measurable (meaningful, motivating).
- Achievable (agreed, attainable).
- Relevant (reasonable, realistic and resourced, results-based).
- Time bound (time-based, time limited, time/cost limited, timely, time-sensitive).

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Sustainable Development Select Committee work plan 2021-22

Item	Type	Corporate priority	30-Jun-21	15-Sep-21	23-Nov-21	18-Jan-21
Catford Town Centre Regeneration: masterplan framework	Performance monitoring	All				
Emissions based short stay parking and motorcycle charging	Policy development	CP6				
Waste strategy	Policy development	CP6				
A21 Strategy	Policy development	CP6				
Environmental operations review (including mechanisation proposal)	Standard item	CP6				
Implementation of the transport strategy: walking, cycling strategy and healthy neighbourhoods	Policy development	CP6				
Budget cuts	Standard item	All				
Local plan consultation update (regulation 19 approval)	Performance monitoring	CP6				
Statement of community involvement	Policy development	All				
Climate Emergency action plan	Performance monitoring	All				

Information items

Corporate Priorities

Priority

1	Open Lewisham	CP 1
2	Tackling the Housing Crisis	CP 2
3	Giving Children and young people the best start in life.	CP 3
4	Building an inclusive local economy	CP 4
5	Delivering and defending: health, social care and support	CP 5
6	Making Lewisham greener	CP 6
7	Building Safer Communities	CP 7

FORWARD PLAN OF KEY DECISIONS

Forward Plan November 2021 - February 2022

This Forward Plan sets out the key decisions the Council expects to take during the next four months.

Anyone wishing to make representations on a decision should submit them in writing as soon as possible to the relevant contact officer (shown as number (7) in the key overleaf). Any representations made less than 3 days before the meeting should be sent to Kevin Flaherty 0208 3149327, the Local Democracy Officer, at the Council Offices or kevin.flaherty@lewisham.gov.uk. However the deadline will be 4pm on the working day prior to the meeting.

A "key decision"* means an executive decision which is likely to:

- (a) result in the Council incurring expenditure which is, or the making of savings which are, significant having regard to the Council's budget for the service or function to which the decision relates;
- (b) be significant in terms of its effects on communities living or working in an area comprising two or more wards.

FORWARD PLAN – KEY DECISIONS

Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
August 2021	Extension of New Hope Mental Health Supported Housing Project	16/11/21 Executive Director for Community Services	Polly Pascoe, Integrated Commissioning Manager and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
October 2021	Instrument of Government Sydenham School	16/11/21 Executive Director for Children and Young People	Suhaib Saeed, Strategic Lead Governors' Services and School Leadership and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
October 2021	Contract award report for Services to support the Whole Systems Approach to Obesity in Lewisham	16/11/21 Executive Director for Community Services	Laura Harper, Public Health Commissioning Manager and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
October 2021	Refurbishment works at Lewisham Library	16/11/21 Executive Director for Community Services	Adam Platts, Project Manager and Councillor Andre Bourne, Cabinet member for Culture		
September 2021	Statement of Council Accounts 2020-21	24/11/21 Council	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		

FORWARD PLAN – KEY DECISIONS					
Date included in forward plan	Description of matter under consideration	Date of Decision Decision maker	Responsible Officers / Portfolios	Consultation Details	Background papers / materials
September 2021	Scheme of Polling Stations for 2022 Elections	24/11/21 Council	Jamie Baker, Electoral Services Manager and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		
October 2021	CRPL - Appointment of Directors	24/11/21 Council	Kplom Lotsu, SGM Capital Programmes and Councillor Paul Bell, Cabinet Member for Housing & Planning		
September 2021	Compulsory Purchase Order application for 2 - 30A Reginald Road	08/12/21 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Housing & Planning		
September 2021	Lewisham and Lee Green Low Traffic Neighbourhood: Consultation report and next steps	08/12/21 Mayor and Cabinet	Louise McBride, Head of Highways & Transport and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
September 2021	Textiles contract award	08/12/21 Mayor and Cabinet	Luke Ellis, Support and Engagement Officer Strategic Waste and Environment and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
August 2021	Financial Monitoring 2021-22	08/12/21	Selwyn Thompson,		

FORWARD PLAN – KEY DECISIONS

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		Mayor and Cabinet	Director of Financial Services and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
September 2021	Award of Contract for Day Services for Older Adults	08/12/21 Mayor and Cabinet	Heather Hughes, Joint Commissioner, Learning Disabilities and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
October 2021	London Borough of Lewisham Waste Strategy	08/12/21 Mayor and Cabinet	Wendy Nicholas, Strategic Waste and Environment Manager and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
October 2021	Award of the School Minor Works Programme Consultant Contract	08/12/21 Mayor and Cabinet	Lemuel Dickie-Johnson, Project Manager Capital Delivery Programme and Councillor Chris Barnham, Cabinet Member for Children's Services and School Performance		
October 2021	Annual Complaints Reports	08/12/21 Mayor and Cabinet	Mick Lear, Service Manager, Benefits and Councillor Kevin Bonavia, Cabinet Member for Democracy, Refugees & Accountability		

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November 2021	Proposal for a Co-productive Approach to Modernisation of Adult Learning Disability Day Opportunities	08/12/21 Mayor and Cabinet	Andrea Benson and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
November 2021	A205 Realignment	08/12/21 Mayor and Cabinet	Patrick Dubeck, Director of Inclusive Regeneration and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
November 2021	Approval to procure Corporate Estate Maintenance Programme: Phases 1 & 2	08/12/21 Mayor and Cabinet	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
October 2021	Laurence House 1st - 4th floor works for 'Future Working' contract award	14/12/21 Executive Director for Housing, Regeneration & Environment	Petra Marshall, Community Resources Manager and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
August 2021	Broadway Theatre Principle Contractor award contract	14/12/21 Executive Director for Community Services	Petra Marshall, Community Resources Manager and Councillor Andre Bourne, Cabinet member for Culture		
August 2021	Ladywell S105 Consultation and budget approval	12/01/22 Mayor and Cabinet	Angela Bryan, Strategic Development Officer and Councillor Paul Bell, Cabinet Member for		

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			Housing & Planning		
October 2019	Mayow Road Supported Living Service Parts 1 & 2	12/01/22 Mayor and Cabinet	Heather Hughes, Joint Commissioner, Learning Disabilities and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
August 2021	Mountsfield Park Café (design, build and operate) award for a new café at Mountsfield Park.	12/01/22 Mayor and Cabinet	Vince Buchanan, Green Spaces Contracts Manager and Councillor Sophie McGeevor, Cabinet Member for Environment and Transport (on parental leave)		
August 2021	Council Tax Base	12/01/22 Mayor and Cabinet	Katharine Nidd, Strategic Procurement and Commercial Services Manager and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
August 2021	Endorsement of the A21 Framework	12/01/22 Mayor and Cabinet	Monique Wallace, Planning Manager, Strategic Housing and Councillor Paul Bell, Cabinet Member for Housing & Planning		
September 2021	Libraries Consortium Courier Service Framework Agreement Contract Award	12/01/22 Mayor and Cabinet	Veronica Hyatt, Service Development Manager and Councillor Andre		

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			Bourne, Cabinet member for Culture		
September 2021	Learning Disabilities Framework - Award of Contracts & related contract extensions) for LDF2	12/01/22 Mayor and Cabinet	Joanne Lee, Contracts Monitoring Officer and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
October 2021	Lewisham Air Quality Action Plan 2022-2027	12/01/22 Mayor and Cabinet	Eliane Foteu, Environmental Protection Manager and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
November 2021	New Cross Road Acquisition	12/01/22 Mayor and Cabinet	James Ringwood, Housing Delivery Manager and Councillor Paul Bell, Cabinet Member for Housing & Planning		
November 2021	Capital Strategy 2022/23	12/01/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
November 2021	HRA Budget 2022/23	12/01/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Paul Bell, Cabinet Member for		

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			Housing & Planning		
August 2021	Main Grants Programme 2022-25 recommendations for funding	02/02/22 Mayor and Cabinet	James Lee, Director of Communities, Partnerships and Leisure and Councillor Kim Powell, Cabinet member for Business and Community Wealth Building		
November 2021	Housing Revenue Account Business Plan	02/02/22 Mayor and Cabinet	Dawn Eckersley, Head of Housing Partnerships and Service Improvement and Councillor Paul Bell, Cabinet Member for Housing & Planning		
November 2021	Treasury Management Strategy	02/02/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
November 2021	Budget Cuts Report	02/02/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
November 2021	Council Budget 2022-23	09/02/22 Mayor and Cabinet	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De		

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			Ryk, Cabinet Member for Finance and Resources		
November 2021	Award of Corporate Estate Maintenance Programme Phases 1 & 2 works contract	09/02/22 Mayor and Cabinet	Akweley Badger, Project Support Officer and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
August 2021	Council Budget 2022-23	02/03/22 Council	Kathy Freeman, Executive Director for Corporate Resources and Councillor Amanda De Ryk, Cabinet Member for Finance and Resources		
October 2021	Location Priority Policy & Procurement Strategy	09/03/22 Mayor and Cabinet	Michael Moncrieff, Housing Policy & Partnerships Manager and Councillor Paul Bell, Cabinet Member for Housing & Planning		
October 2021	Climate Emergency Action Plan update	09/03/22 Mayor and Cabinet	Martin O'Brien, Climate Resilience Manager and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
October 2021	Approval of Flood Risk Management Strategy 2022-27	09/03/22 Mayor and Cabinet	Martin O'Brien, Climate Resilience Manager and Councillor Patrick Codd, Cabinet Member for Environment & Transport		
October 2021	Future Homecare	09/03/22	Corinne Moocarme, Joint		

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	Arrangements (New Model and Procurement Process)	Mayor and Cabinet	Commissioning Lead, Community Support and Care, Community Services, LBL and Councillor Chris Best, Cabinet Member for Health and Adult Social Care		
November 2021	Blackheath Joint Events Policy 2022-2027	09/03/22 Mayor and Cabinet	Nick Pond, Parks and Open Space Contracts and Service Development Manager and Councillor Patrick Codd, Cabinet Member for Environment & Transport		

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