

Integrated Impact Assessment (IIA) of the Lewisham Local Plan

SA Report Addendum

January 2025

Quality information

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1 Introduction

1.1.1 AECOM is leading on the Integrated Impact Assessment (IIA) process that is being undertaken alongside preparation of the Lewisham Local Plan. The IIA process aligns fully with the Sustainability Appraisal (SA) process that is a requirement for local plans and differs from SA only in terms of substantive focus. Specifically, IIA involves a focus on appraising the merits of the plan and alternatives in respect of equalities and health objectives, in addition to the sustainability objectives that are the focus of SA.

1.1.2 The formally required IIA Report was published alongside the final draft ('proposed submission') version of the Local Plan in 2022 under Regulation 19 of the Local Planning Regulations. The aim of the IIA Report, in accordance with regulatory requirements, was essentially to present an appraisal of "the plan and reasonable alternatives" and "an outline of the reasons for selecting the alternatives dealt with".

1.1.3 The Local Plan was then submitted to the Government for Examination in Public in November 2023 alongside the IIA Report and all representations received through the preceding Regulation 19 publication stage. The appointed Planning Inspectors then oversaw Examination Hearings, followed by publication of a Post Hearings Letter on 8th November 2024, which set out the following in respect of next steps:

"Overall, at this stage of the Examination, we consider that, subject to MMs, the Plan is likely to be capable of being found legally compliant and sound. Our final conclusions on this... will be published following consultation on the proposed [Main Modifications, MMs], taking into account any representations on them.

The next step in the Examination is for the Council to prepare a consolidated schedule of all the potential MMs identified prior to, and during, the Hearing sessions...

The MMs will need to be the subject of Sustainability Appraisal (SA)... insofar as this is necessary, to be undertaken by the Council prior to consultation and published alongside the proposed MMs...

Advice on MMs and SA, including the consultation process is set out in the Planning Inspectorate's Procedure Guide for Local Plan Examinations 2024... Amongst other things... It should be made clear that the consultation is only about the proposed MMs and not about other aspects of the Plan and that the MMs are put forward without prejudice to the Inspectors' final conclusions...

If, following the MMs consultation, we consider that a further Hearing is necessary to discuss matters raised in representations, we will advise the Council at that stage. However, currently we do not anticipate a further Hearing will be required."

1.1.4 The aim of this report is essentially to present an appraisal of the proposed Main Modifications (MMs) and reasonable alternatives (just as the fundamental requirement of the IIA Report was to present an appraisal of the draft plan and reasonable alternatives, as discussed above).

1.1.5 The aim is to inform the current consultation which – it is important to be clear – is focused only on MMs. In turn, this report is an 'Addendum' to the IIA Report (2022).

1.1.6 This report is structured as follows:

- Section 2 – presents a summary of the proposed Main Modifications.
- Section 3 – considers the question of reasonable alternatives.
- Section 4 – presents an appraisal of the proposed Main Modifications.

Revisiting the IIA Report

1.1.7 As discussed, this is an addendum report with a specific purpose and does not aim to re-present information from the IIA Report (2022) that is of little or no relevance to the current consultation on MMs.

1.1.8 However, **Appendix 1** does present an update to Section 7 of the IIA Report, which sought to present the response of Lewisham Borough Council (LBC) Officers to the preceding appraisal of reasonable alternatives (Section 6 of the IIA Report) and, in turn, present their reasons for taking forward the preferred option as "Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (para 35 of the NPPF 2021). This reflects concerns raised by the Inspectors through the Examination Hearings, as discussed in their Post Hearings Letter of 8th November 2024.

2 The proposed Main Modifications

2.1 Introduction

- 2.1.1 The aim here is to introduce and ‘screen’ the proposed Main Modifications in order to enable targeted discussion / appraisal in the subsequent two sections.
- 2.1.2 The context is an understanding that IIA must focus on ‘significant effects’ where significance is understood in the context of the Local Plan as a whole. Within the IIA Report (2022) this understanding translated into a strong focus on what might be loosely termed the ‘spatial strategy’ (but which might more precisely be defined as the key diagram and associated site allocations and policies with a direct bearing on the quantum, location and timing of development within the Borough over the plan period).
- 2.1.3 Given this context, it might be suggested that the scope of MMs that need be a focus of IIA is very limited, because the MMs do not involve any fundamental or arguably even significant changes to the spatial strategy (as discussed below), and it might even be suggested that MMs-focused IIA work is not needed.
- 2.1.4 However, regardless of considerations around significant effects, this report is an opportunity to focus attention on, and explore issues and impacts around, those MMs that stand-out as *more significant*.
- 2.1.5 The task of screening MMs is made easier on account of an overview prepared by LBC Officers.

2.2 LBC Officers’ overview of the MMs

- 2.2.1 Officers provide the following summary overview:

“It is noteworthy that the Inspectors considered it unnecessary to consider substantive modifications to many key parts of the new Local Plan. This notably includes the scale and development within Opportunity Areas; affordable housing requirements including contributions from small sites; affordable workspace; the target for specialist accommodation (inclusive of Gypsy & Traveller accommodation); viability for self-build schemes; design quality; the overall approach to pawn shops and betting shops; registered assets of community value; biodiversity net gain; infrastructure provision; and climate change.

Equally, the proposed modifications do not substantively alter the spatial strategy and the majority of its associated site allocations. Critically, the Inspectors are not seeking modifications to introduce any additional site allocations.

Nevertheless, the main modifications make several noteworthy amendments to the new Local Plan. In order to provide a full understanding of the key proposed modifications a schedule is set out under [the table] below.”

- 2.2.2 The key point to take from this is that whilst the MMs do not substantively alter the spatial strategy, there are some substantive adjustments made to certain site allocations. This is a key matter to focus on as part of the appraisal, given the importance of focusing on significant effects.
- 2.2.3 Officers then present a more detailed summary of the MMs across a schedule that is presented in full below. Drawing upon the table, we (AECOM) would further summarise the scope of MMs as follows:
- Certain of the MMs are somewhat **procedural** with few if any substantive implications that might meaningfully be a focus of appraisal, for example (1) and (2) in the table below.
 - Rows (3), (4) and (5) in the table deal with the related matters of **building heights**, tall buildings and view management. These are key issues for the local plan and warrant being a focus of appraisal.
 - Rows (6) and (7) deal with providing for housing needs and delivering workspace. These are **key MMs** that must be a focus of appraisal.
 - Proposed MMs in respect of **Policy SD3 (Minimising Greenhouse Gases)** are considered to warrant being a focus of attention. This is a topic that is a focus of debate nationally at the current time.

- **Other thematic policy areas** that are a focus of MMs relate to: affordable workspace (row 8); concentrations of uses (9); community infrastructure (10); sports and open space (11); and transport / movement (12). In all cases proposed modifications are of limited significance, but matters can be explored further through the appraisal. Affordable workspace potentially stands out as a key issue.
- Rows (12), (13) and (15) deal with safeguarding etc land for planned and potential **infrastructure**. This is an important matter for the local plan, but there is little if anything in the way of policy choice.
- Remaining rows in the table mainly deal with **consequential changes**.

Table 2.1: Schedule summarising key MMs

Ref	Policy modification	Commentary
1	Modification to all policies to identify their status as either a strategic or non-strategic policy.	This modification was specified by the Inspectors at the examination and responds to the national planning policy requirement that local plan policies identify themselves as either strategic or non-strategic. The proposed modifications provide a clear link from each policy back to the strategic objectives set out at the start of the Plan.
2	Modification to Policy QD1 Delivering high quality design in Lewisham to provide a clear cross-reference to the National Design Guide.	This modification was specified by the Inspectors at the examination. It seeks to clarify the relationship between the new Local Plan and national planning policy guidance on securing quality design.
3	Modification to Policy QD4 Building heights to provide further clarity for decision taking.	This was proposed by the Inspectors at the hearing sessions. Whilst it clarifies the matter of the other possible considerations/ factors that may inform decision-taking on the height of tall new buildings, it does not fundamentally alter the new Local Plan's approach. Proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.
4	Amendments to tall building suitability zone	These are fairly minor changes to the extent of the tall building suitability zone agreed through the hearings with the Culverley Green Residents Association.
5	Modifications to Policy QD5 View management	A series of modifications that clarify how view management will be considered through the Council's decision-taking. These modifications were informed by comments from a number of local community groups. The modifications are noteworthy as they suggest that the Council could undertake further work, following adoption, to identify and confirm the status of other locally significant views.
6	Modifications to Policy HO1 Meeting Lewisham's housing needs; and subsequent supporting text and related tables.	These comprise a comprehensive series of modifications that amend and raise the new Local Plan's housing target, providing further detail in respect of the scale of housing backlog that will be addressed and delivered; and the accommodation of the 20% buffer (on the five-year housing supply) introduced in response to poor housing delivery.
7	Modifications to Policy EC2 Protecting employment land and delivering new workspace. Associated changes to Policies EC5 Strategic Industrial Locations (SIL); EC6 Locally Significant Industrial Sites (LSIS); and EC7 Mixed-use Employment Locations (MEL).	A comprehensive series of modifications to the policy and its associated supporting text in response to concerns raised by the Mayor of London/ GLA. These modifications focus upon how the new Local Plan will implement, deliver, and manage the provision of industrial employment land and capacity.
8	Policy EC4 – Low-cost and affordable workspace	The Inspectors advised the Council to prepare a modification that clarified how contributions towards low-cost and affordable workspace would be secured from B2 and B8 developments. They encouraged the Council to engage with those participants who had submitted representations on this matter.
9	Modifications to Policy EC17 Concentration of Uses, its associated supporting text and mapping	To clarify how the Council will apply the policy approach in its decision-taking; specifically in relation to proposals for new hot-food takeaway uses. This suite of relative minor modifications were proposed by the Inspectors to clarify how the policy would be applied.

Ref	Policy modification	Commentary
10	Policy CI1 Safeguarding and securing community infrastructure; and Policy CI2 High quality community infrastructure and its supporting text	A series of modifications that clarify how the policy approach will consider proposals involving existing community uses, and how development viability will be considered during decision-taking.
11	Policy CI3 - Sports, recreation, and play; and Policy GR2 Open space, and its associated supporting text.	A series of modifications across two interrelated policy areas/ approaches that were suggested by the Inspectors in direct response to representations made by the Downham Dividend Society. These seek to make it clear that new provision will be publicly accessible and inclusive; and will secure health, wellbeing, and community cohesiveness improvements for residents.
	Policy SD3 – Minimising Greenhouse Gases	A new modification introduces a threshold of at least 35% into the policy.
12	Policy TR1 - Sustainable transport and movement, and supporting text and tables	A series of modifications that clarify how new development will deliver necessary transport infrastructure improvements. Importantly, the modifications revisit and relocate the improvement schemes that had previously been identified at submission. There is an associated requirement that the Council update and maintain its Infrastructure Delivery Plan to ensure that improvements are clearly identified, prioritised, and linked to planned-for growth.
13	Policy TR2 - Bakerloo line extension and supporting text	Modifications that clarify how the policy approach will legally ensure that the route alignment is safeguarded in accordance with the status afforded by the Secretary of State and emerging work from TfL and other BLE partners.
14	Lewisham's Neighbourhoods and Places Table 13.1	Consequential modification to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.
15	Policy LCA 3 - Catford major centre and surrounds	Modification to include more explicit reference to the re-alignment of the South Circular Road and the need to de-designate Metropolitan Open Land – this is a requirement under national planning policy.
16	Lewisham Central Area site allocations subject to increases – Policy LCA SA 2 – Lewisham Shopping Centre; Policy LCA SA 5 - Land at Conington Road and Lewisham Road (Tesco); Policy LCA SA 15 - Land at Nightingale Grove and Maythorne Cottages; and Policy LCA SA 22 - Ravensbourne Retail Park	Consequential modifications to site allocations to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.
17	Lewisham North Area site allocations subject to increases - Policy LNA SA 3 – Evelyn Court Locally Significant Industrial Site; Policy LNA SA 5 – Surrey Canal Road and Trundleys Road Locally Significant Industrial Site; Policy LNA SA 6 – Apollo Business Centre Locally Significant Industrial Site; Policy LNA SA 9 – Surrey Canal Triangle Mixed-Use Employment Location; and Policy LNA SA 17 – Lower Creekside Locally Significant Industrial Site	Consequential modifications to site allocations to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.
18	Lewisham East Area site allocations subject to increases - Policy LEA SA 3 – Leegate Shopping Centre; Policy LEA SA 4 - Sainsbury's Lee Green; and Policy LEA SA 7 – Mayfields Hostel, Burnt Ash Hill	Consequential modifications to site allocations to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.

Ref	Policy modification	Commentary
19	Lewisham South Area site allocations subject to increases - Policy LSA SA 1- Former Bell Green Holders and Livesey Memorial Hall; Policy LSA SA 5 - Sydenham Green Group Practice; Policy LSA SA 8 Land at Pool Court, and Policy LSA SA 9 – Catford Police Station	Consequential modifications to site allocations to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.
20	Lewisham West Area site allocations subject to increases - Policy LWA SA 2 - 6 Mantle Road; Policy LWA SA 3 – Jenner Health Centre; Policy LWA SA 9 – Willow Way Locally Significant Industrial Site (LSIS)	Consequential modifications to site allocations to reflect the uplift in housing supply work carried out by the Council and to align with the final proposed housing trajectory. See 6 above.
21	Policy DM3 Masterplans and comprehensive development	Modifications to clarify the expectations on development industry partners positively engaging with other relevant land owners during the master planning process in order to bring forward site allocations comprehensively. The Inspectors encouraged the Council to engage with a specific participant (Lewisham House) to identify a possible modification.
22	Policy DM4 Land assembly	Modification to clarify the expectations on development industry partners in bringing forward sites in a comprehensive manner. The proposed modification drew upon comments from Landsec.
23	Policy DM7 Monitoring and review and Table 19.1	Modification to the content of the performance monitoring indicators contained within Table 19.1. This modification was proposed by the Inspectors.

2.3 Screening conclusion

- 2.3.1 The focus of appraisal must be on the MMs as a whole, just as the focus of appraisal within the IIA Report is the Local Plan as a whole. There is no requirement to appraise each and every MM in isolation. However, the MMs are extensive such that there is a need to screen MMs in order to identify those that warrant being a focus of the appraisal.
- 2.3.2 The conclusion of the discussion above is that attention focuses on proposed changes to the housing requirement (or ‘target’) and associated site allocations (i.e. MMs relating to Policy HO1 and consequential MMs) and also proposed changes to Policy EC2 (Protecting employment land and delivering new workspace). However, a range of other proposed modifications discussed above also warrant being a focus of the appraisal including those dealing with thematic policy areas and not least climate change.
- 2.3.3 Box 2.1 introduces proposed changes in respect of the housing requirement and proposed allocations.

Box 2.1: Introducing proposed changes in respect of the housing requirement and proposed allocations

The Inspector’s Post Hearings Letter explains:

“Housing Requirement and Supply

The Council prepared several housing requirement scenarios and updated the housing trajectories to address the need to apply a 20% buffer to the five-year supply of housing land arising from the Housing Delivery Test (HDT) (Dec 2023) ... Based on this additional evidence, the Council should apply the Liverpool method to meeting the backlog, but over the remainder of the Plan period, in order to ensure a five-year supply of housing land on adoption... This approach aligns with Scenario E and E.2 of the housing requirement scenarios identified in LC34B...

Housing Allocations/Trajectory

Following the Hearing sessions revised trajectories have been prepared for each site allocation reflecting discussions regarding the timing, delivery and, in some cases, capacity of the site. These are set out in document LC34B. MMs will need to be made to the housing trajectory in Appendix 6 of the Plan together with any consequential MMs to site allocations and other policies to reflect these revisions.”

The first point to note is that the London Plan target of 1,667 homes per year remains the basis for the housing requirement (i.e. the number of homes that the Council commits to delivering each year over the plan period).

Secondly, there is a need to boost the housing requirement across the plan period post adoption in order to make up for undersupply against the London Plan target over the years between the start of the plan period and the point of adoption. Various different options for addressing the backlog were considered, but ultimately the decision is taken that “the Council should apply the Liverpool method to meeting the backlog, but over the remainder of the Plan period”, which ultimately increases the housing requirement by 231 homes each year between 2025/26 and 2033/34 and 232 homes each year thereafter until the end of the plan period in 2039/40.

Fourthly, at plan adoption there is a need to ensure a five year housing land supply as measured against the housing requirement ($1,667 + 231 = 1,898$) and, because of the Council's performance against the Housing Delivery Test (Dec 2023), there is also a need to demonstrate a 20% buffer. This leads to a need to identify supply that will deliver within the five years post adoption amounting to $5 \times (1,667 + 231 + 380) = 11,390$ homes.

The above need not be called into question, but there is a key question regarding how to adjust the housing supply trajectory in order to reflect the new housing requirement for each year of the plan period post adoption and the need to be able to demonstrate a five year housing land supply at the point of plan adoption.

Adjusting the housing supply trajectory

The process of adjusting the trajectory commenced prior to the hearing sessions, because it was recognised that there would be a need to account for the new Housing Delivery Test results published in December 2023. However, the process was completed subsequent to hearings, in light of a final decision regarding extending the plan period and addressing the backlog, and in light of detailed discussions of individual sites at hearings.

Focusing on work prior to hearing sessions, an emerging proposed approach was set out within an Additional Housing Supply Background Paper (May 2024) (LC10). Also, an ‘SA Note’ (June 2024) was also submitted to the Examination that aimed to summarise the emerging proposed approach, discuss potential issues/impacts and also consider the question of whether there might be any ‘reasonable alternatives’.

The Background Paper and SA Note focused specifically on adjusting the supply trajectory in respect of sites able to deliver in the first five years, whilst at the current time adjustments are also made to the supply trajectory of sites able to deliver later in the plan period. However, the Background Paper (May 2024) and SA Note (June 2024) are still of relevance, as the majority of key changes relate to sites set to deliver in the first five years.

The SA Note summarised the emerging proposed approach to boosting supply in years 1 to 5 post adoption as involving: 1) Increasing capacity at allocated sites on the basis of latest information from planning consents, planning applications or pre-app discussions; 2) reflecting latest understanding of when allocated sites will deliver, in light of information from planning consents, planning applications or pre-app discussions; 3) increasing capacity at allocated sites in light of higher figures proposed by site promoters but not to the full extent proposed (in light of Council-led work on average residential densities in the vicinity of the sites); and 4) accounting for additional windfall supply (i.e. non-allocated sites) on account of planning consents and pre-app discussions.

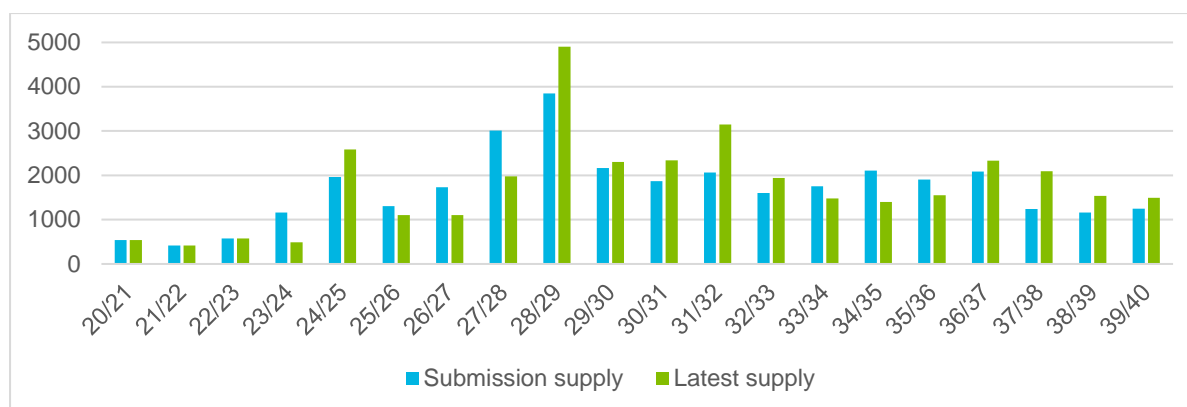
This broad approach to boosting five year supply is unchanged at the current time, although precise figures are now adjusted, including in light of discussions at hearing sessions. Additionally, and as discussed, there are also now some adjustments made to capacity and/or supply trajectory for sites delivering later in the plan period.

When seeking to scrutinise the merits of the proposed approach, the first point to note is that attention need not focus on consented sites. Also, attention naturally focuses on the question of changes to site capacities more so than changes to the anticipated timing of delivery.

The latest situation is that adjustments are made to the supply trajectory across a total of 45 allocations. **Appendix 2** sets out proposed changes to site capacities and anticipated delivery timescales more fully.

The net effect is that supply over the period 2020/21 to 2039/40 now totals 35,305 homes, which averages out at 1,765 homes per annum. This is a boost of 1,547 homes relative to PD18 Housing Trajectory – Update to Appendix 6 that was submitted alongside the Local Plan in November 2023, when total supply over the 20 years was 33,758 homes, or 1,687 homes per annum.

Figure 2.1 shows the submission and current supply trajectory over time. Additionally, there is a need to consider the effect of changes to the supply trajectory for specific sub-areas within the Borough, which can be understood from the analysis presented in Appendix 1.

Figure 2.1: Submission supply trajectory versus latest supply trajectory (MMs)

3 Reasonable alternatives

- 3.1.1 In light of the discussion above, which aims to present an overview of the proposed MMs that potentially give rise to significant implications for the achievement of sustainability objectives, there is a need to make a decision regarding whether or not there is a need to formally define and appraise reasonable alternatives (RAs) at the current stage (i.e. to inform the current consultation on Main Modifications).
- 3.1.2 By way of context, the IIA Report (2022) focused attention on RA 'growth scenarios', essentially in the form of alternative key diagrams. These varied in respect of the approach to growth at certain key sub-areas in the Borough, where it was identified that there was a strategic choice to be made, with a range of issues and opportunities to be weighed in the balance. The RA growth scenarios (six in total) were then appraised in Section 6 of the IIA Report, which concluded a range of differential significant effects.
- 3.1.3 At the current time, whilst there do remain some choices open to the Council / Inspectors, these are detailed choices relating to fine-tuning the approach to growth at certain site allocations and potentially fine-tuning certain thematic policies. It is sufficient and proportionate to explore these choices through the appraisal of MMs presented below (Section 4) as opposed to formally defining and appraising alternatives. Whilst alternatives could feasibly be defined – notably in respect of the capacity supported at certain site allocations – there is no confidence that these would be 'reasonable' in the sense that the appraisal would be able to reach meaningful conclusions in terms of differential significant effects.
- 3.1.4 In **conclusion**, there are no reasonable alternatives at the current time.

4 Appraisal of Main Modifications

4.1 Introduction

- 4.1.1 The primary aim of this section is to present an appraisal of the proposed MMs, as introduced above, under the IIA Framework (see Section 3 of the IIA Report), at the core of which is a list of 11 topic headings.
- 4.1.2 The aim is not to discuss every MM systematically under each element of the IIA framework, but rather to present a targeted discussion guided by the screening work in Section 2.
- 4.1.3 A secondary aim is then to consider the ('cumulative') effect of the proposed Main Modifications in combination with those aspects of the Submission Plan not proposed to be modified and, in doing so, update the conclusions on the Submission Plan reached within the IIA Report (2022).
- 4.1.4 A primary focus of the appraisal is the effect of adjusting (primarily boosting) site capacities, also recognising that sites can impact in-combination (in both positive and negative terms). There is also a need to recall that the phasing of site delivery can give rise to issues/effects, e.g. given the need to phase housing delivery with infrastructure upgrades; however, it is more difficult to reach clear conclusions regarding notable effects (let alone significant effects).

4.2 Air quality and pollution

- 4.2.1 **Lewisham shopping centre** is a key site for consideration here and under a number of other IIA framework headings, because the site is not consented (it is at the pre-app stage) and MMs involve a considerable boost to site capacity. Specifically, the new proposal is to support 2,145 new homes, rather than 1,579 homes, and to no longer support employment floorspace (offices). The proposal is to retain the focus on town centre uses, and to modestly boost floorspace from ~60,000 sqm to ~70,000 sqm.
- 4.2.2 The site is clearly very important from a perspective of supporting good access to town centre uses, with the Local Plan explaining that the site “*forms the heart of Lewisham major centre*” and the IIA Report (2022) highlighting the site as “*key to the renewal of the town centre...*”
- 4.2.3 There is also the context of aiming to build the case for the Bakerloo Line Upgrade and Extension (BLE) (Phase 1 would extend to Lewisham) and Lewisham’s designation as a Metropolitan Centre within the forthcoming new London Plan. In turn, the site is important from a transport perspective.
- 4.2.4 The importance of the site in accessibility and transport terms translates into a degree of importance in respect of the achievement of air quality and pollution objectives. However, it is difficult to reach strong conclusions regarding the merits of the proposed changes to capacity / use mix. There is no clear concern with replacing office space with residential, and there is a need to factor-in the importance of supporting development viability and, in turn, timely delivery.
- 4.2.5 With regards to **other proposed MMs**, it is difficult to suggest any significant implications for air quality and pollution objectives. A series of modifications to Policy TR1 (Sustainable transport and movement) are broadly supported, and it is noted that there are no proposed changes to Policy TR3 (Healthy streets).
- 4.2.6 There is also support for proposed changes to Policy LCA 3 (Catford major centre and surrounds) that relate to re-alignment of the South Circular Road and the need to de-designate Metropolitan Open Land, with the view at the time of the IIA Report (2022) having been that “realignment of the South Circular (A205) will address existing issues of severance and pollution”. N.B. Appendix IV of the IIA Report also presented an appraisal of reasonable alternatives in respect of the issue of South Circular realignment.
- 4.2.7 In **conclusion**, the MMs do not give rise to any significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.1) broadly still holds true for the Submission Plan plus MMs.

Box 3.1: Conclusion from the IIA Report (2022) – Air quality and pollution

The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support/unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough. The effect should be to minimise need to travel by private car amongst the Borough’s residents and, in turn, minimise traffic and associated air pollution.

Specific points of support relate to: a carefully targeted approach to densities at Bell Green/Lower Sydenham (BGLS), where masterplanned strategic growth (under BLE Phase 2) could assist with reducing car dependency amongst residents of nearby neighbourhoods; numerous proposed allocations that will support walking/cycling, including along the A21 corridor, and/or access to greenspace; the proposed approach to growth at Catford, which is in line with the Catford Town Centre Masterplan, including in respect of improved town centre permeability and realignment of the South Circular; and the proposed approach to Lewisham town centre, which should be supportive of town centre viability and movement objectives.

There are some question-marks regarding proposed densities in the north of the Borough; and it is also important to note that the proposed approach to assigning an indicative use mix at strategic sites has been adjusted since the Draft Plan stage, with an increased emphasis on floorspace given over to residential, informed by the Town Centre Study (2022).

With regards to the proposed DM policies, Policy SD6 (Improving air quality) sets stringent requirements. The Interim SA Report (2020) suggested “*it will be important to ensure that the firm focus of the Local Plan is on avoiding air pollution... noting that the effectiveness of mitigation measures can often be associated with a degree of uncertainty*”, hence the new focus on air quality neutral developments is tentatively supported. The following statement within supporting text is of note...

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage. Whilst development management policy has been notably strengthened, there remain certain question-marks regarding development density and use mix.

4.3 Biodiversity and green infrastructure

4.3.1 **Conington Road Tesco** is a key site for consideration, where the current proposal is to boost capacity by 48 homes. There is a degree of biodiversity sensitivity associated, as discussed within the IIA Report:

“Conington Road (which is committed) and [Conington Road Tesco] are two adjacent sites in the central sub-area closely associated with the river corridor. Site specific policy explains that: “Development should positively respond in scale, bulk and massing to the River Ravensbourne, taking advantage of the natural slope of the site. The river embankment should be visually and physically accessible from Conington Road and improve access to Lewisham transport interchange, Lewisham Gateway and the wider town centre environs.” Site specific policy has been supplemented, since the Draft Plan stage, to require that consideration is given to the River Corridor Improvement Plan SPD. However, it is understood that a local action group, with an interest in re-naturalising the river corridor... wish to see firmer requirements set.”

4.3.2 A second site for consideration is **6 Mantle Road**, where the current proposal is to boost capacity by 26 homes and also to boost town centre uses from 378 sqm to 4,571 sqm. This site has a degree of biodiversity sensitivity, with the IIA Report explaining: *“111-115 Endwell Road and 6 Mantle Road are two nearby small proposed allocations adjacent to the railway line and the associated embankment, which is designated as a SINC. Site specific policy for both proposed allocations explains that proposals must “... seek to enhance green infrastructure, including the SINC and green corridor along the railway...”*

4.3.3 Another site of note is **Sainsbury's Lee Green** (proposal to boost capacity by 26 homes) given two other allocations that will together deliver over 600 homes (primarily Leegate Shopping Centre). There is extensive green infrastructure to the east, within LB Greenwich, associated with the upper reaches of the Quaggy River. Site specific policy for the site most closely associated with the river (Land at Lee High Road and Lee Road) references the need to enhance access and “ecological quality”; however, site specific policy for the other two sites does not discuss any biodiversity opportunity.

4.3.4 The final site for consideration is then **Pool Court**, where the proposal is to support one additional Gypsy and Traveller pitch. This site is notably sensitivity in biodiversity terms and, indeed, is a locally designated Site of Importance for Nature Conservation (SINC). The site is very closely associated with the river corridor, and it is noted that site specific policy has been amended to specifically refer to the SINC and also veteran trees. Furthermore, there is an important in-combination consideration given proximity to proposed strategic allocations in Bell Green Lower Sydenham (BGLS).

4.3.5 With regards to **other proposed MMs**, it is difficult to suggest any significant implications for biodiversity and green infrastructure objectives.

4.3.6 In **conclusion**, the MMs do not give rise to significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.2) broadly still holds true for the Submission Plan plus MMs. Attention focuses on several sites with a degree of biodiversity sensitivity where the proposal is to boost capacity, but there is little reason to suggest this gives rise to significant biodiversity concern, given the potential to avoid and mitigate impacts through detailed work at the development management stage. It could also be that a boost to capacity leads to additional opportunities for enhancement, e.g. to river corridors.

Box 3.2: Conclusion from the IIA Report (2022) – Biodiversity and green infrastructure

The proposed spatial strategy is broadly supported in that the main focus of growth is within the central and south sub-areas of the Borough, with a high proportion of proposed allocations closely associated with the valley of the River Ravensbourne and its tributary the Pool River (the rivers meet at Catford; very close to a small proposed gypsy and traveller site, which comprises land designated as a SINC). This is a green infrastructure priority area, as identified by the All London Green Grid. There are widespread significant opportunities to re-naturalise the river and improve public accessibility, and it is difficult to suggest that intensification of uses along the river corridors leads to a tension with biodiversity and green infrastructure objectives, assuming appropriate densities that do not preclude delivery of generous open space within development sites. Indeed, growth could well support the aspiration of delivering a South East London Green Chain Regional Park.

There are potentially some tensions under a scenario whereby BLE Phase 2 enables a higher growth strategy at BGLS, but these are uncertain. Elsewhere, a number of sites are adjacent to locally designated SINCs, including SINCs associated with railway embankments / cuttings, and there is potentially a geographical clustering of constrained sites in the west of the Borough.

With regards to the proposed DM policies, the suite of proposed policies will help to ensure that biodiversity impacts associated with development – both at proposed allocations and at windfall sites – are suitably avoided or mitigated. No proposed DM policies are highlighted as leading to notable tensions in respect of biodiversity objectives. The plan notably includes a suite of ‘Green infrastructure’ focused policies, and the new proactive and strategic approach to biodiversity net gain is particularly supported, as is the new strategic approach to managing the open space network. The following statement, made within the supporting text, relates to a key strategic opportunity: *“New development can help to enhance access to open space even where it is not feasible to deliver new public open space on site. Through the design-led approach development proposals should seek to deliver public realm enhancements to create new routes or improve connections to existing or planned new open spaces, particularly in areas of deficiency.”*

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage, with relatively limited changes to the plan of note.

4.4 Climate change adaptation

4.4.1 Flood risk is a key consideration, and this was an issue that was a considerable focus of the appraisal conclusions reached within the IIA Report (2022). Several of the sites flagged as being subject to a degree of flood risk in the IIA Report are now proposed for increased capacity (focusing on residential uses), which potentially gives rise to a tension with flood risk objectives, in that avoiding and mitigating flood risk could become more challenging. However, it is only possible to comment here at a high level, and in reality concerns will likely be reduced through detailed work at the planning application stage and through consultation with the Environment Agency. All of the sites listed below bar one (Sainsbury’s Lee Green) are either the subject of a current planning application or at an advanced stage of pre-app discussions.

4.4.2 **Sites subject to flood risk** now proposed for a boost to capacity are as follows:

- Lewisham shopping centre – has been introduced above. The site is subject to a degree of flood risk, hence there is potentially a tension with the current proposal to significantly boost the number of homes supported at the site. The north west part of the site falls within flood risk zone 3.
- Ravensbourne Retail Park – is a second key site to consider, where the current proposal is to boost capacity by 94 homes. This site is subject to flood risk (an objective is to enhance the river corridor) and the current proposal is also to add specifications regarding limiting building heights along the site’s frontage (to avoid impacts to the adjoining Culverley Green Conservation Area), which could feasibly generate tensions with objectives around masterplanning the site with flood risk in mind.
- Sainsbury’s Lee Green – is proposed for 26 additional homes, and the site is strongly associated with flood risk zone 3. The IIA Report also explained the following context: *“In the east of the Borough, the proposal is to intensify uses at Lee Green district centre through redevelopment of three adjacent sites, including mixed use redevelopment of an existing Sainsbury’s. All sites are constrained by the adjacent River Quaggy; indeed, it is notable that the Lee Green district town centre is the first point along the course of the river, as it flows west to meet the Ravensbourne at Lewisham, that is heavily urbanised, with the river to the east buffered by extensive areas of greenspace.”*
- Pool Court – is now proposed for one additional Gypsy and Traveller pitch. This is a 0.3 ha site located to just to the southwest of the Catford Masterplan area; specifically, to the south of the large proposed allocation at Wickes and Halfords, Catford Road. The site comprises a ‘left over’ triangle of land at the point where the two railways south of Catford cross-over one another. The River Ravensbourne borders the site, and the confluence of the rivers Ravensbourne and Pool is near adjacent to the west of the site (separated by the railway); however, the site is shown intersect flood zone 2 (as opposed to flood zone 3, which constrains Wickes and Halfords, Catford Road), presumably because the river is effectively channelled or culverted at this point. The II Report stated: *“Whilst it is recognised that this site has been identified following a site selection process undertaken over a number of years, given the onsite constraints, it is recommended that further detailed assessments of biodiversity and flood risk are undertaken, with additional requirements/guidance included within the site allocation, as appropriate... This recommendation reflects the consultation response received from the GLA in 2020.”*

- 4.4.3 One other site of note is Lewisham Retail Park, where the current proposal is not to adjust capacity, but to push back delivery beyond the first five years. Whilst adjustments to phasing have limited implications, there is arguably a degree of support for reducing the pressure to deliver challenging sites such as this. In particular, the site is strongly associated with flood risk zone 3.
- 4.4.4 With regards to **other proposed MMs**, it is difficult to suggest any significant implications for climate change adaptation objectives.
- 4.4.5 In **conclusion**, the MMs likely do not give rise to any significant effects, but there will be a need to confirm this through consultation with the Environment Agency. The conclusion previously reached for the Submission Local Plan (Box 3.3) broadly still holds true for the Submission Plan plus MMs.

Box 3.3: Conclusion from the IIA Report (2022) – Climate change adaptation

In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that is a focus of proposed growth is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone. The proposed broad approach to delivering mixed use at sites that currently comprise non-vulnerable uses – i.e. commercial and industrial land – warrants further scrutiny, from a flood risk perspective, including in light of recent updates (since the Draft Plan stage) to calculating an appropriate use mix at individual sites. There will be very good potential to avoid and mitigate flood risk at the development management stage, including by Sustainable Drainage Systems and ensuring less vulnerable uses on the ground floor; however, there is a need to avoid risk where possible.

With regards to the proposed DM policies, Policy SD7 (Reducing flood risk) commits to a sequential approach to avoiding flood risk, with development in the flood zone only in exceptional circumstances, which serves to highlight the importance of close scrutiny of the plan. Supporting text explains that: *“Where the Sequential and Exception Tests are satisfied 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).”*

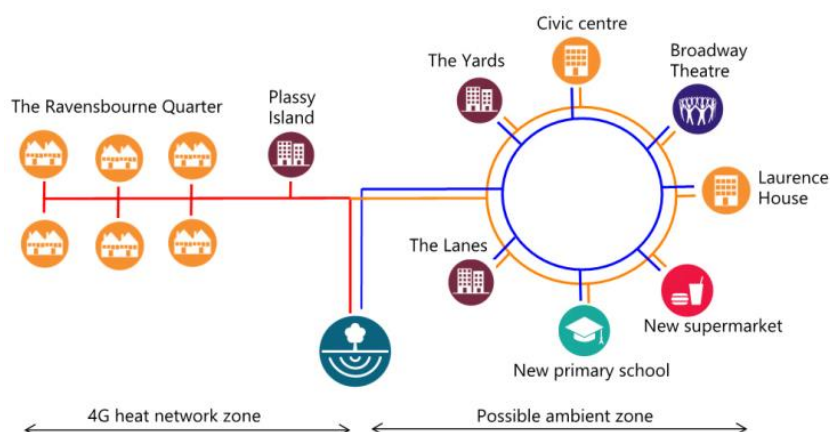
In conclusion, **moderate negative effects** are predicted although there is considerable uncertainty. Whilst one allocation has now been removed (with the new proposal to use the site for strategic flood water storage) there remain question-marks regarding site selection, proposed densities and use mixes at sites subject to flood risk. The Environment Agency will comment through the consultation.

4.5 Climate change mitigation

- 4.5.1 The key matter for consideration here is **Policy SD3** (minimising greenhouse gas emissions), which sets out to require clearly that major development proposals “must be net zero-carbon” and also that: “Development proposals should minimise energy demand of the building(s) in-use by seeking to achieve the London Energy Transformation Initiative (LETI) targets for projected Energy Use Intensity.”
- 4.5.2 In this regard, there is a need to avoid conflict with references elsewhere in the plan to achieving “*on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved major development applications*”, and it is noted that the Inspectors Post Hearings Letter states:
- “The supporting text to Policy SD3 (minimising greenhouse gas emissions) in paragraph 11.12 refers to the threshold of at least 35%. To be effective this percentage threshold should be within the policy.”*
- 4.5.3 This is a matter that has been a focus of considerable national debate over recent years, and particularly following a Written Ministerial Statement (WMS) published in December 2023, which did two things: 1) raised the bar in respect of the evidence base needed to justify setting local policy requiring that developments achieve energy/carbon standards over-and-above the requirements set out in Building Regulations (operational emissions focus); and 2) strongly sought to discourage any such local level policy from requiring specified level of performance in terms of energy metrics (i.e. Energy Use Intensity, EUI).
- 4.5.4 However, the reality is that the majority of emerging plans nationally and in London do set out to require net zero development (in accordance with the energy hierarchy, i.e. ‘fabric first’ onsite net zero, i.e. with offsetting only as a last resort) with performance calculated/evaluated on the basis of energy metrics.

- 4.5.5 In particular, within London this approach is widely supported following a seminal report published in 2023 titled [Delivering Net Zero](#). Also, a [legal opinion](#) on this matter was published on 8th January 2025, which also includes a particular focus on the London context.
- 4.5.6 A benefit of requiring that the performance of buildings is evaluated using energy metrics is that this approach allows for ease of understanding and, in turn, ease of scrutiny at the planning application stage. In turn, it is important to ensure that the Local Plan policy is entirely clear.
- 4.5.7 The other matter that was a key focus of the IIA Report was directing growth with a focus on delivering **heat networks**, recognising that heat networks are costly and technically challenging to deliver, such that every opportunity must be realised through spatial strategy, particularly in terms of density, use mix and realising opportunities to draw upon ambient or waste heat ('energy masterplanning'). With these steps being taken through the Local Plan, there can be little confidence that heat networks will be delivered in practice, i.e. opportunities will be missed that arise potentially once in a century.
- 4.5.8 Catford town centre is a key area for consideration, and in this regard the current proposal to push back delivery at certain key sites is perhaps supported, in that it allows more time for heat network opportunities to be explored. However, **Lewisham shopping centre** is the key site for consideration. A possible a heat network has been discussed, and this will be heavily dependent on density and use mix.

Figure 4.1: Heat network opportunities in Catford (from the Energy Masterplan, 2020)



- 4.5.9 In **conclusion**, the proposed MMs do not give rise to a significant concern on the assumption that there will remain a clear requirement to deliver net zero development applying the 'energy metrics' approach. It is recommended that the likelihood of delivering one or more heat networks is reported clearly.
- 4.5.10 The conclusion previously reached for the Submission Local Plan (Box 3.4) broadly still holds true for the Submission Plan plus MMs, albeit some of the discussion is now somewhat dated, recognising that this is a fast-moving policy area (and, in turn, it should be noted that London Plan policy dates from ~2017).

Box 3.4: Conclusion from the IIA Report (2022) – Climate change mitigation

Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes and businesses that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of micro power generation, e.g. solar panels). Delivery of heat networks can prove challenging and costly, hence there is a need to realise opportunities through spatial strategy. This serves to highlight the strategic masterplanned redevelopment at BGLS as representing a clear opportunity, and there are also opportunities at Lewisham, Catford and in the north of the Borough that should be capitalised upon, in line with the Energy Masterplan.

With regards to sustainable design and construction, a range of stringent requirements are proposed, including in respect of achieving nationally recognised standards (Home Quality Mark, BREEAM) and offsetting mechanisms to enable achievement of 'zero carbon' major developments in-line with the emerging New London Plan policy. There may be a need for further work ahead of plan finalisation, to ensure a suitably ambitious approach, although it will be important to note the national and regional context and development viability.

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage. The Interim SA Report (2020) encouraged a proactive focus on realising built environment decarbonisation opportunities through spatial strategy and site specific policy, building upon the momentum created following the Energy Masterplan (2020), and recognising that this is a fast-moving policy area, but this had only occurred to a limited extent...

4.6 Communities 1: Accessibility

4.6.1 Key considerations here relate to directing growth to the most accessible locations within the Borough and also delivering community uses as part of mixed use schemes. Key sites for consideration are as follows:

- **Lewisham shopping centre** – has been discussed above and is clearly a key site for ongoing scrutiny.
- **Catford town centre** – the current proposal is to push back delivery at two key sites – Catford Shopping Centre and Milford Towers; Catford Island – which is likely unavoidable, but has implications for ongoing work in respect of regeneration and delivering on the objectives of the Catford Town Centre Framework.
- **Ravensbourne Retail Park** (proposal is to boost capacity by 94 homes) – the IIA Report flagged the importance of considering the use mix, as this is a key site in the south of the A21 corridor.
- **Lee Green** – a key site for consideration at the current time is the Sainsbury's site, which has been discussed above. The IIA Report explained:

“Another notable opportunity is associated with Lee Green district town centre, where there is a cluster of three proposed allocations, including Leegate Shopping centre (for which a planning application was submitted in 2018) and the adjacent Lee Green Sainsbury's site. This area is associated with a degree of relative deprivation, in an otherwise more affluent part of the Borough. The Local Plan explains that: “Development proposals must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green District centre, including 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 must also deliver a complementary mix of main town centre uses, along with new housing, whilst ensuring that the centre's predominant commercial and community role is maintained and enhanced.” There could be benefit to masterplanning the sites in combination, however this may be a challenge given the current application for Leegate Shopping Centre.”

It is noted that the current proposal for the Sainsbury's site (in addition to boosting residential capacity) includes removing the requirement for employment space and boosting space for town centre uses.

- **Albany Theatre** – this is a key cultural venue in Deptford, hence there is support for ensuring that development is not rushed. The current proposal is to push back delivery beyond the first five years.
- **Sydenham Green Group Practice** – comprises an existing large health centre adjacent to the proposed BGLS strategic growth area. The current proposal is to boost capacity by 19 homes; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure. This is one of the sites within BGLS identified as having the potential to deliver a considerably higher density scheme under a BLE Phase 2 scenario. However, relative to the Draft Plan stage there is now an assumption for a split of uses more weighted towards non-housing uses.
- **Willow Way LSIS** – this site benefits from proximity to a local centre, hence there is potentially a degree of support (from an accessibility perspective) for the current proposal to boost capacity by 35 homes.
- **6 Mantle Road** – is in the less-accessible west of the Borough, but benefits from proximity to a train station, hence there is potentially a degree of support for the current proposal to boost capacity by 26 homes and also to boost town centre uses from 378 sqm to 4,571 sqm. This is a cleared site, and the Local Plan explains: *“Development will also enable the introduction of positive frontages and public realm enhancements along Mantle Road to improve the townscape and station approach.”*

- 4.6.2 With regards to **other proposed MMs**, it is difficult to suggest any significant implications for accessibility objectives. A series of modifications are proposed to Policy C11 (Safeguarding and securing community infrastructure) and Policy C12 (High quality community infrastructure), but the effects are modest. The aim is to *clarify* how the policy approach will consider proposals involving existing community uses, and how development viability will be considered during decision-taking.
- 4.6.3 In **conclusion**, the MMs do not give rise to any significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.5) broadly still holds true for the Submission Plan plus MMs.

Box 3.5: Conclusion from the IIA Report (2022) – Accessibility

The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration. Specific points of support relate to the proposed strategy for: Catford, where an ambitious approach to regeneration is supported, in accordance with the Catford Town Centre Masterplan; Bell Green / Lower Sydenham (BGLS), where an ambitious approach to growth should benefit the wider south of the Borough, including the Strategic Area of Regeneration (although there is a need for further work to confirm the extent to which benefits will extend beyond the immediate station surrounds); and the proposed clustering of proposed allocations at district and local centres is strongly supported, notably at Lee Green and Grove Park.

With regards to changes to use mixes, since the Draft Plan stage, it is understood that these often reflect the findings of detailed studies including the Town Centre Trends Study (2021). However, it is difficult to reach an overall conclusion on the merits of the changes, from a 'communities (accessibility)' perspective. Certain aspects are clearly supported, such as the proposed approach to Lewisham Shopping Centre, and a clear rationale is also apparent for sites such as: Land at Engate Street; Catford Shopping Centre and Milford Towers; and Ravensbourne Retail Park. However, overall there would be merit to further work to clarify the strategy, taking account of the latest position in respect of delivery of non-residential uses at major committed sites. It is recognised that assigning indicative use mix requirements is a challenging aspect of plan-making, because of the need for site-specific discussions (i.e. discussion on what non-residential uses can viably be retained / re-provided / provided, mindful that the landowner require a financial incentive to re-develop the site, and this incentive comes from residential uses, with density / building height implications) and because of the constantly shifting baseline in respect of consents.

With regards to the proposed DM policies, the plan notably includes a suite of 'Community infrastructure' focused policies, which present firm commitments in respect of safeguarding existing community infrastructure alongside delivery of new and enhanced community infrastructure; and wide-ranging other proposed policies are also supportive of accessibility objectives, including the suites of policies presented within the 'Green infrastructure' and 'Transport and connectivity' sections of the plan.

In conclusion, **significant positive effects** are predicted, albeit noting the potential to take steps to ensure the Local Plan performs even more positively ahead of plan finalisation. This is as per the conclusion reached at the Draft Plan stage, although it is important to note that changes since the Draft Plan change do give rise to certain tensions, most notably the new proposed approach to calculating use mix.

4.7 Communities 2: Housing

- 4.7.1 As discussed in Section 2 of this report: *"The net effect is that supply over the period 2020/21 to 2039/40 now totals 35,305 homes, which averages out at 1,765 homes per annum. This is a boost of 1,547 homes relative to the submission stage, when total supply over the 20 years was 33,758 homes, or 1,687 homes per annum."* This is in the context of a **London Plan target of 1,667 homes**; hence the current proposals clearly represent a proactive approach from a perspective of delivering market and affordable housing (recognising that market led schemes will deliver a proportion of affordable in line with policy).
- 4.7.2 The IIA Report explained that there are clear arguments for boosting supply from a housing perspective (albeit also drawbacks, e.g. from an accessibility / transport perspective without the BLE). Under the new proposed approach there is confidence that the Council will be able to maintain a five year housing land supply and will not face ongoing issues in respect of performance against the Housing Delivery Test.

- 4.7.3 With regards to **other proposed MMs**, it is difficult to suggest any significant implications for housing objectives. As discussed in Section 2, a key point to note is that there are no proposed changes to policy requirements in respect of affordable housing, and it is also the case that none of the proposed changes give rise to concerns in respect of implications for development viability that might, in turn, impact the ability to deliver affordable housing in line with policy requirements.
- 4.7.4 In **conclusion**, the MMs are supported, from a housing perspective, but the conclusion previously reached for the Submission Local Plan (Box 3.6) broadly still holds true for the Submission Plan plus MMs. Specifically, there is no clear case for 'boosting' the conclusion to 'significant positive effect' given that the proposal remains to set the housing requirement in line with the London Plan target, and in the context of the Government's new Standard Method, which identifies housing need of 2,664 homes per annum.

Box 3.6: Conclusion from the IIA Report (2022) – Housing

With regards to the spatial strategy, the identified supply is sufficient to enable the housing requirement to be set at the level of the London Plan housing target (1,667 homes per annum) over the entirety of the plan period, with a healthy supply buffer to reflect delivery risks. The proposal is also to ensure flexibility to deliver higher growth under a scenario whereby the BLE comes forward, which is supported as housing needs are understood to be in excess of the London Plan Target, and additional market housing would also lead to delivery of additional affordable housing, helping to address acute needs that exist. Further considerations relate to provision for small sites, specialist housing needs (with one allocation proposed for older persons accommodation), and gypsy and traveller accommodation (one allocation is proposed).

With regards to the proposed DM policies, the Local Plan includes a section dedicated to Housing, comprising ten separate policies covering topics including: Genuinely affordable housing; Housing estate maintenance, renewal and regeneration; Accommodation for older people; Supported accommodation; Purpose built student accommodation; Housing with shared facilities (Houses in Multiple Occupation); and Gypsy and traveller accommodation. Delivery of genuinely affordable housing is a clear corporate priority for the Borough Council, and this is reflected in the Policy HO3, which sets a strategic target for 50% of all new homes delivered in the Borough to be genuinely affordable, as well as a local definition of 'genuinely affordable housing', although there is now a need to account for national policy on First Homes.

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion reached at the Draft Plan stage. Focusing on total supply, the broad approach is largely unchanged from the Draft Plan stage, with: several proposed allocations from that stage now having been removed from the plan; just one new proposed allocation for residential (which has planning consent); and amended densities / use max calculations at a number of sites (including, where necessary, an increased emphasis on residential uses, which should be support of development viability).

4.8 Communities 3: Wider issues

- 4.8.1 Within the IIA Report (2022) the discussion under this heading focused on matters relating to health and equality, but there are few significant issues for consideration in respect of the current proposed MMs, over-and-above those that have already been discussed above.
- 4.8.2 Once again, it is appropriate to flag **Lewisham Shopping Centre** as a key site, and it is noted that the current proposal is to add the following statement to supporting text:
- "The Council have secured £19m from the Levelling Up Fund, which the Council will use to fund works to enhance the market in 2024. Redevelopment of Lewisham Shopping Centre should be considerate of the emerging Lewisham Market proposals and complement its offer."*
- 4.8.3 Further considerations relate to: **Achilles Street** (lost 60 homes), which is a sensitive site on account of comprising an existing housing estate; and **Pool Court**, where the proposal is now to deliver an additional Gypsy and Traveller pitch, but there is a need for ongoing scrutiny as this is a constrained site.
- 4.8.4 With regards to **other proposed MMs**, it is difficult to suggest any significant implications. The proposed modifications to Policy EC4 (Low-cost and affordable workspace) are of note, but it is difficult to suggest significant implications. The aim is to *clarify* how contributions towards low-cost and affordable workspace would be secured from B2 and B8 developments.

4.8.5 In **conclusion**, the MMs do not give rise to any significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.7) broadly still holds true for the Submission Plan plus MMs.

Box 3.7: Conclusion from the IIA Report (2022) – Wider communities issues

There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. It is a challenge to identify aspects of the spatial strategy that relate strongly to equalities, health and 'other community' objectives. However, broadly speaking, key elements of the spatial strategy are: A) a focus on the Strategic Area of Regeneration (including support for a high growth strategy at BGLS under a BLE P2 scenario); B) support for growth, investment and regeneration within town centres, in particular Catford; and C) support for improved movement infrastructure and improved urban realm along transport corridors, including the A21. Other considerations relate to implications of the spatial strategy for access to employment opportunities, including for those with lower skills, and possibility of flood risk disproportionately impacting poorer neighbourhoods is a further consideration.

With regards to the proposed DM policies, the Local Plan includes requirements in respect of numerous matters that will help to ensure that development has the effect of reducing inequality, supporting good health and addressing pockets of relative deprivation and poor health in the Borough. As discussed above, stringent policies are proposed in respect of matters including community infrastructure, affordable and specialist housing needs, and policy in respect of air quality is also of note, as this is an important health related consideration. Policy support for an increase in the number of homes delivered at small sites in the Borough's Strategic Area of Regeneration is another key consideration. Also of note here are policies proposed in respect of environmental health considerations, with the Local Plan including policies on: Amenity and agent of change; Noise and vibration; External lighting; Building alterations, extensions and basements; and Infill and backland sites, back gardens and amenity areas.

In conclusion, **moderate positive effects** are predicted, as per the conclusion at the Draft Plan stage. The Interim SA Report (2020) found there to be 'considerable uncertainty' and identified a need for "further work to understand the links between Local Plan policy choices and priority issues for local communities and groups, including groups with protected characteristics under the Equality Act." In this respect, a key point to note is the recent A21 Development Framework, which includes a particular focus on supporting 'active regeneration' along the road corridor in the south of the Borough, namely to the south of the New Cross, Lewisham and Catford Opportunity Area. This is supported, because this stretch of the road corridor is strongly associated with that part of the Strategic Area of Regeneration that falls outside of the scope of the ongoing Borough Green and Lower Sydenham vision work. However, there are relatively few proposed allocations along this southern part of the A21 corridor (Ravensbourne Retail Park is a key site), and there remains a need to ensure a clear strategy for the wider part of the Area of Regeneration. There is also a need to consider 'refresh' work in respect of strategy for Catford town centre, and possibly also the New Cross Area, recognising the changing context since work was completed, in terms of the pressures and wider issues faced by local communities.

4.9 Economy

4.9.1 With regards to changes to **site allocations**, the proposal is to reduce support for offices at several sites, but it is difficult to suggest that this gives rise to significant concerns in respect of providing for employment needs locally. Focusing on sites where the current proposal is to boost residential, sites of note include:

- **Evelyn Court LSIS** – this is a key site to consider, where the current proposal is to boost capacity by 58 homes, and to retain the anticipated quantum of employment land. This is one of three small areas within the Surrey Canal Road SIL where the proposal is to change the designation to LSIS (which then generates a need to designate a compensatory new area of SIL at Bermondsey Dive-under). This indicates a degree of sensitivity, and the IIA Report also notes: "The proposal is now for more intensive redevelopment of this 0.27 ha site, compared to the Draft Plan stage, namely 102 homes (up from 38 homes) and 2,381m2 employment space (up from 1,310m2)."
- **Ravensbourne Retail Park** – where the current proposal is to boost capacity by 94 homes. The IIA Report explained: "Another site of note is Ravensbourne Retail Park, which does not comprise designated employment land, but which is notably adjacent to the Bromley Road SIL. The proposed strategy is notably amended, in comparison to the Draft Plan stage, with the new proposal for a mixed use residential and employment scheme, as opposed to residential and retail / town centre uses." The current proposal is to support/assume 7,749 sqm of employment space, as per the submission plan.

- 4.9.2 With regards to **other proposed MMs**, other than the discussion above regarding Policy EC4 (Low-cost and affordable workspace), the key matter for consideration is proposed changes to Policy EC2 (Protecting employment land and delivering new workspace), along with associated changes to Policies EC5 (Strategic Industrial Locations, SIL), EC6 (Locally Significant Industrial Sites, LSIS) and EC7 (Mixed-use Employment Locations, MEL). The changes are in response to concerns raised by the Mayor of London/ GLA, and focus upon how the new Local Plan will implement, deliver, and manage the provision of industrial employment land and capacity. Amongst other things, there is a new proposed statement within supporting text concisely setting out those LSIS supported for mixed use redevelopment:
- “The LSIS sites identified as having the capacity and suitability for co-location uses are: Apollo Business Centre, Blackheath Hill, Childers Street West, Clyde Vale, Evelyn Court, Lower Creekside, Perry Vale, Stanton Square, Trundley’s, Willow Way and Worsley Bridge Road.”*
- 4.9.3 There is also notably a new criterion within Policy EC2 itself that lends support for Class B8 storage or warehousing uses outside of SIL where: *“The capacity is required to meet the needs of the Central Services Area as set out in London Plan Paragraph 6.4.7.”*
- 4.9.4 In **conclusion**, the MMs are supported in light of close working with the GLA aimed at ensuring employment land in Lewisham is able to continue to support the Central Services Area. In this light, it is appropriate to now boost the appraisal conclusion from the IIA Report stage. Specifically, it is now considered appropriate to conclude **moderate positive effects** for the Local Plan plus MMs.

Box 3.8: Conclusion from the IIA Report (2022) – Economy

It is difficult to draw an overall conclusion. On one hand there are outstanding questions regarding the proposed approach to designating new SIL to substitute for the release of SIL (to LSIS), and there is inevitably a degree of risk around the potential to effectively co-locate residential and light industrial uses through mixed use redevelopment within LSIS (and MEL). Also, at several LSIS allocations the latest proposal is for more intensive redevelopment than envisaged at the Draft Plan stage. This could feasibly lead to challenges in respect of accommodating light industrial uses, including at lower cost and affordable rents, with potential risks that some industries and businesses may need to re-locate out of the Borough.

However, on the other hand, numerous proposed allocations are set to deliver significant new employment floorspace that is well tailored to meeting the needs of growth sectors – notably the cultural, creative and digital industries – and the plan is supportive of wide-ranging enhancements to town centres as employment locations. The effect should be to support a shift to more knowledge sector jobs, from a low baseline position. A shift to more jobs in the knowledge economy can have the effect of pricing out existing businesses; however, concerns are allayed given the considerable focus on delivering new affordable workspace, and also in the knowledge that the Council can act to curate high streets and support local small businesses, in particular in Catford.

With regards to the proposed DM policies, the Local Plan includes a range of relevant policies within the section on Economy and culture. The following is considered to be a particularly important statement: *“Where the co-location of uses on LSIS... is proposed, development should be designed to ensure there is no net loss of industrial capacity [with reference to Policy EC2], and to seek net gains wherever possible. The net loss of industrial capacity will only be considered in the exceptional circumstances set out in Policies EC5.E and EC5.G. 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. This includes consideration of impacts on the function and amenity of employment areas and industrial uses in proximity to the site, whether within or outside the Borough, as the benefits of agglomeration of compatible uses is often integral to the viability of employment land. Furthermore, to offset the loss of industrial capacity applicants will be required to demonstrate that a wider public benefit 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 element, in line with the London Plan policy H4 (Delivering affordable housing).”*

In conclusion, on balance there is support for higher density schemes that will deliver additional employment floorspace, including low cost and affordable workspace suited to small and micro-sized businesses in industries/sectors that are strategic growth priority locally, as part of efforts to widen the economic base. Furthermore, there is clearly the potential to transform the local economy of the BGLS area, although there remains a degree of uncertainty in respect of the role of an employment hub here, in the Borough and wider context. However, there is a degree of risk associated with SIL substitution and mixed used redevelopment of existing LSIS. For this reason, uncertain effects are predicted.

4.10 Historic environment, heritage, character and culture

4.10.1 **Bell Green Gas Holders and Livesey Memorial Hall** is a key site for consideration, where the proposal is to boost capacity by 74 homes. This is a prominent and complex site, as discussed within the recent Housing Target/Requirement Hearing Statement (2024):

“... the challenges of redeveloping the site without detrimentally impacting on the heritage, cultural, nature conservation and open space assets of the site. Additionally, it is now anticipated that the site will be delivered in advance of the delivery of the Bakerloo Line Upgrade and Extension and thereby the opportunity to further uplift the capacity on this site will be missed.”

4.10.2 The IIA Report did not highlight any further issues over-and-above those discussed above (N.B. the report incorrectly refers to the gas holders as still being present, but in fact the site has been cleared). Overall, it is clear that the site has been a focus of detailed work leading to the current proposal to boost capacity by 74 homes, and whilst BLE Phase 2 could serve as an argument for explore a further boost, there is currently no certainty regarding the BLE.

4.10.3 **Catford Police Station** is another key site for consideration, where the current proposal is to boost capacity by 30 homes. Heritage is a key sensitivity here, with the IIA Report explaining that it is “a locally listed building, and the potential for redevelopment is explored in detail through the A21 Development Framework. The proposal is to retain the main historic building fronting the A21 and redevelop land to the rear.” However, the report also notes that: “The current proposal is for 24 homes, whilst the proposal at the Draft Plan stage was for 39 homes.” Finally, this is another site where there is a need to consider whether the proposal to boost housing capacity has implications for use mix, noting that the proposed use mix at this site evolved between the draft plan stage and publication/submission.

4.10.4 With regards to **other proposed MMs**:

- Policy QD4 (Building heights) – proposed modifications aim to provide further *clarity* for decision taking. Whilst it clarifies the matter of the other possible considerations/ factors that may inform decision-taking on the height of tall new buildings, it does not fundamentally alter the approach. Proposals will still be expected to include robust design justifications for the heights proposed, including testing in key views.
- Policy QD5 (View management) – a series of modifications aim to *clarify* how view management will be considered through the Council’s decision-taking. These modifications were informed by comments from a number of local community groups and are noteworthy as they suggest that the Council could undertake further work, following adoption, to identify and confirm locally significant views.
- Culverley Green Conservation Area – in light of concerns raised by the Residents Association, the new proposal is to amend a tall building suitability zone (a fairly minor change) and also add site specific policy in respect of the Ravensbourne Retail Park allocation (as discussed above).

4.10.5 In **conclusion**, the MMs do not give rise to any significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.9) broadly still holds true for the Submission Plan plus MMs.

Box 3.9: Conclusion from the IIA Report (2022) – Historic environment, heritage, character and culture

The spatial strategy reflects a carefully targeted approach to assigning indicative development densities to sites, with density assigned via a design-led approach (building on initial outcomes of the London Plan SHLAA standard methodology) at a selection of sensitive sites. At Lewisham several sites are assigned lower densities on the basis that they are associated with the transition between the town centre and neighbouring residential areas. At BGLS there is a need to consider the cluster of listed buildings / structures to adjacent to the west of the gas holders, the heritage value of the gas holders themselves, the distinctive townscape and character of the Bellingham Estate to the east (which was influenced by ‘garden city’ principles and is associated with a homogenous form of low density housing) and locally important buildings within the Stanton Square LSIS proposed allocation, including a well-preserved art deco building. These assets could come under pressure under a BLE Phase 2 / higher growth scenario; however, there will be good potential to avoid and mitigate impacts through masterplanning and design.

With regards to DM policies, the Local Plan includes a section on Heritage, with policies covering: Lewisham's historic environment; Designated heritage assets; and Non-designated heritage assets. The following is a key statement: *“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...”*

It is also important to note the importance of site specific policy. Taking one example, site specific policy for Lower Creekside LSIS (albeit now consented), which states: *“Development should be informed through an understanding of the site's historic significance, and in particular it's past river related industrial activity and seek to preserve and enhance the Deptford Creek Conservation Area and the historic Crossfield Estate and its green open spaces that are integral to the design of the estate.”* There is confidence that allocations / indicative densities are proposed with a good understanding of the potential to avoid and mitigate historic environment impacts through design etc. However, there remains the need for further work, and there will be a need to take account representations received through the current consultation.

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

4.11 Land and natural resources

4.11.1 Other than broad support for optimising development densities, it is difficult to suggest that the proposed MMs give rise to any significant or otherwise notable implications. In turn, the conclusion reached for the Submission Local Plan (Box 3.10) broadly still holds true for the Submission Plan plus MMs.

Box 3.10: Conclusion from the IIA Report (2022) – Land and natural resources

The spatial strategy leads to limited implications. All proposed allocations are brownfield, other than one proposed 'backland' site, and there is no reason to suggest that the proposed approach to growth will lead to challenges in respect of sustainable waste management. With regards to DM policy, there is a particular need to set out the Council's expectations in respect of waste management and supporting a circular economy, recognising that there are always significant steps that can be taken, over-and-above the status quo, but that these can be associated with a cost to the developer / planning applicant. Current policy allows for flexibility, and so there will be the potential to explore further policy specificity ahead of plan finalisation.

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

4.12 Transport

4.12.1 Most of the key issues/effects of relevance have already been discussed above. However, it is appropriate to focus here on the matter of **development timing** (as opposed to site capacities), given the links between development and transport infrastructure delivery. Specifically, infrastructure must be in place to support growth, but growth must also come forward in order to fund infrastructure. Points to note include:

- Boroughwide – the new proposed approach involves a boost to development over the period 2028 to 2032, as shown by Figure 2.1 (above). However, there are few if any reasons to suggest concerns regarding transport infrastructure capacity. Matters were explored through a Transport Assessment in early 2024, as summarised within the Housing Target/Requirement Hearing Statement (2024).
- Bakerloo Line Extension – there is boost to capacity at two key sites in Lewisham, but delivery at Lewisham Retail Park is pushed back, and at Catford delivery at two key sites is also pushed back, whilst at Bell Green / Lower Sydenham the proposed approach is broadly unchanged. Overall it is difficult to suggest any significant implications for supporting the BLE business case.

4.12.2 Within regards to **other proposed MMs**:

- Policy TR1 (Sustainable transport and movement) – a series of modifications *clarify* how new development will deliver necessary transport infrastructure improvements. Importantly, the modifications revisit and relocate the improvement schemes that had previously been identified at submission. There is an associated requirement that the Council update and maintain its Infrastructure Delivery Plan to ensure that improvements are clearly identified, prioritised, and linked to growth.

- Policy TR 02 (Bakerloo line extension) – modifications *clarify* how the policy approach will legally ensure that the route alignment is safeguarded in accordance with the status afforded by the Secretary of State and emerging work from TfL and other BLE partners.

4.12.3 In **conclusion**, the MMs do not give rise to any significant effects and the conclusion previously reached for the Submission Local Plan (Box 3.11) broadly still holds true for the Submission Plan plus MMs.

Box 3.11: Conclusion from the IIA Report (2022) – Transport

Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under ‘air quality’, a matter of potential overriding importance is matching development densities to PTAL, and in this respect the proposed spatial strategy is supported. With regards to BGLS, as discussed under ‘air quality’ and ‘accessibility’, there is cautious support for the Local Plan’s commitment to follow a more ambitious, higher density growth strategy under a BLE Phase 2 scenario. All of these factors serve to suggest the likelihood of significant positive effects, although there remains a degree of uncertainty at this stage... with the potential for more detailed work to understand how the spatial strategy might best serve to respond to existing transport issues/opportunities and also the extent to which transport impacts can be mitigated.

With regards to the proposed development management policies, the Local Plan includes a section dedicated to Transport with policies on: Sustainable transport and movement; Bakerloo line upgrade and extension; Healthy streets as part of healthy neighbourhoods; Parking; Deliveries, servicing and construction; Taxis and private hire vehicles; and Digital and communications infrastructure and connectivity. The policies are notably cross-cutting; for example supporting text explains that: *“High quality public realm underpins the integrated approach to land use and transport... Development proposals will be expected to consider public realm at the early stage of the design-led process, having regard to Policies QD3... and TR3...”*

In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. The following recommendation from the Interim IIA Report (2020) continues to hold true: *“Moving forward, there should ideally be a re-examination of spatial growth scenarios / reasonable spatial strategy alternatives on the basis of a firm assumption regarding BLE delivery, in order to ensure that the Local Plan spatial strategy responds most appropriately to future PTAL and directs growth so as to realise opportunities in respect of increasing accessibility and delivering transport infrastructure upgrades.”* It is unfortunate that there remains uncertainty regarding the BLE, because were there certainty it would be possible to undertake additional detailed work to ensure that the local plan responds as proactively as possible to the opportunities that will arise...

5 Conclusions

5.1.1 In **conclusion**, the appraisal flags the following key issues / effects:

- Flood risk – this was a key issue that was a focus of the IIA Report (2022) and there is a need for ongoing scrutiny in light of the proposed MMs.
- Climate change mitigation – there is a need to ensure that Policy SD3 is clear and aligns with latest understanding regarding good practice nationally. Heat networks must also remain a focus.
- Economy – there is support for the MMs that deal with ensuring a targeted and carefully considered approach to the mixed use redevelopment of LSIS.
- Housing – the proposed approach of boosting supply, particularly in the early years of the plan period, is strongly supported.
- Transport, accessibility and air quality – there is broad support for the proposed changes, including in respect of a boost to capacity at Lewisham shopping centre.

Appendix I: Revisiting the IIA Report

As discussed in Section 1, this is an addendum report with a specific purpose and does not aim to re-present information from the IIA Report (2022) that is of little or no relevance to the current consultation on MMs.

However, this appendix presents an update to Section 7 of the IIA Report, which sought to present the response of LBC Officers to the preceding appraisal of reasonable alternatives (Section 6 of the IIA Report) and, in turn, present their reasons for taking forward the preferred option as “Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (para 35 of the NPPF 2021). This reflects concerns raised by the Inspectors through the Examination Hearings, as discussed in their Post Hearings Letter of 8th November 2024.

Expanding on Section 7 within the IIA Report

Section 7 within the IIA Report presented the Council’s response to the appraisal of reasonable alternative growth scenarios presented in preceding Section 6. The summary appraisal matrix from Section 6 of the IIA Report is shown below, in order to provide context.

Under a BLE Phase 2 scenario there is clarity on the reasons / justification for supporting high growth at Lower Sydenham and Bell Green, i.e. Scenario 6. However, and as stated by the Inspectors in their Post Hearings Letter, the text in Section 7 of the IIA Report provides less clarity on reasons for not supporting higher growth at Catford under either a scenario whereby the BLE is not delivered (‘no BLE’) nor a BLE Phase 1 scenario.

Focusing on Catford, the primary assumption was that the higher growth scenario appraised would involve a tall buildings cluster. This was explained at paragraph 5.4.11 of the IIA Report:

“The following sites... fall within this area: 17, 18, 19, 21, 22. All bar site 22 fall within the area covered by the emerging Town Centre [Framework], through which preferred indicative densities have been established. The overall approach seeks to strike a balance between suitability for tall buildings in transport terms but constraints to tall buildings in terms of townscape and heritage. The current proposal is to support the densities set out in the Masterplan. However, as per the view taken in 2020, it is considered... reasonable to explore the option of creating a tall buildings cluster at Catford. The specifics would need to be explored further through a detailed study, but there might be potential for an uplift of c.20%.”

Expanding on this, a key point to note is that significant stakeholder and community involvement took place during the preparation of the Framework which informed the capacity of the Catford sites in the Local Plan. Within the Framework, each site has been considered in detail, looking at key development principles and parameters including open spaces, public spaces, built form, active frontages, movement, uses, building heights, development impacts and illustrative layouts. This serves to reinforce the appraisal conclusion regarding clear drawbacks to higher growth at Catford under the ‘Historic environment, heritage, character and culture’ sustainability topic heading, and it is understood that officers do place considerable importance (‘weight’) on this drawback.

Furthermore, limited capacity to boost densities / supply from Local Plan allocations in Catford is evidenced by recent work undertaken by the Council in May 2024 that looked at increasing the supply of housing to accommodate a 20% buffer (LC10) and also during the examination hearing session discussions on the deliverability of the sites in the housing trajectory. Throughout the process the Catford sites LCA SA 17, 18, 19 and 21 have retained their original site capacities. For one site – LCA SA 22 Ravensbourne Retail Park – the latest proposal is to uplift the site capacity, following the 20% buffer work (LC10) and the hearing session discussions on site deliverability, but the additional 94 residential units now proposed on this site will only generate a 3% uplift, and there is little if any reason to suggest that a further uplift represents a policy choice warranting ongoing consideration.

Further points to note are as follows:

- The current site capacities align with the pre-application discussions that have taken place in respect of: Thomas Lane Yard, which forms part of site allocation LCA SA 17; and LCA SA 18 Catford Island.
- At site 21 the IIA Report discussed flood risk as a constraint, which fed into the order of preference assigned to the growth scenarios under the ‘climate change adaptation’ topic heading. Whilst there is no certainty, it could be that this constraint acts as a significant barrier to delivering a significant boost to site capacity.

All of this still holds true even if Phase 1 of the BLE is delivered, because Phase 1 would terminate at Lewisham town centre, and therefore would not have a major bearing on transport connectivity further south at Catford.

In summary, the current view on ‘Section 7’ text within the IIA Report is as follows:

- The following statement from Section 7 of the IIA Report still holds true: *“In the absence of certainty over the Bakerloo Line Extension (BLE) there is a need to progress a spatial strategy in-line with Scenario 1. However, there is also a need for flexibility in respect of the BLE. Specifically, there is a need to ensure that a framework is in place to support higher density development close to any future BLE stations.”*
- In particular, under a BLE Phase 2 scenario the Council would support an Opportunity Area at Bell Green/Lower Sydenham, and the housing trajectory identifies that there could be a maximum uplift of 2,131 new homes here.
- With regards to Catford, there is certainly not support for significant boost to capacity under either a ‘no BLE’ scenario (IIA Scenario 2) or a BLE Phase 1 scenario (IIA Scenario 4), in light of the issues flagged by the appraisal reported in Section 6 of the IIA Report and also given subsequent work to explore site capacities. Even under a BLE Phase 2 scenario (which would see a new BLE station at Catford), it is not clear that there would be a case for a significant boost to site capacities at Catford, given recent work / latest understanding.

Figure A: The summary appraisal matrix from Section 6 of the IIA Report

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

Appendix 2: Changes to allocations

The aim of this appendix is to consider every Local Plan allocation in turn, in order to explain proposed changes through MMs in respect of site capacity and/or the timing of site delivery ('phasing'). Looking across the suite of proposed allocations, it is these two factors (capacity and phasing) that together determine the borough-wide housing supply trajectory (alongside a windfall assumption), which is a key matter for consider. Specifically, there is a need to ensure that the supply trajectory is sufficient to provide for the housing requirement on an annual basis and ensure that the Council is able to maintain a rolling five year housing land supply.

The capacity and phasing of the site allocations are indicative and have been continually amended, as part of an iterative process; with adjustments made throughout the plan making process, based on the most up-to-date site knowledge. This includes changes to site allocations:

- at Regulation 19 stage – to take account of the responses received during the Regulation 18 consultation;
- at Submission stage – to take account of the responses received during the Regulation 19 consultation, with an amended Appendix 6 Housing Trajectory submitted in November 2023;
- prior to the Hearing sessions – to take account of the result of the Housing Delivery Test in December 2023, by providing interim figures with increased capacity within the first five years after adoption, aiming to accommodate a 20% buffer; and
- during the Hearing sessions – to take account of the discussions regarding the deliverability of the site allocations and ensuring the final figures being proposed as main modifications are in alignment with the most up-to-date pre-application discussions.

Table A sets out to summarise changes made since Submission, but where there was a change between Regulation 19 and Submission this is highlighted with an asterisk (*).

Table A also highlights:

- Site allocation column – the yellow highlighting indicates sites that will deliver at least partially in the crucial first five years of the plan period post adoption.
- Proposed MM column – the yellow highlighting indicates sites that are both the subject of an MM (in respect of capacity or phasing) and which are entirely non-permitted.

Table A: Changes made to site allocations (capacity and phasing) since the submission stage¹

Site allocation	Proposed main modifications
Central area	
Lewisham Gateway	-
Lewisham Shopping Centre	Boost capacity by 567 homes and significant change to phasing (reduction of 105 homes in the first five years). N.B. a departure from the interim position prior to hearing sessions.
Land at Engate Street	-
Conington Road	Delivery now prior to the first five years.

¹ A final point to note is that the trajectory now assumes supply from several large windfall sites that are not permitted. Five of these have a capacity comfortably below 100 homes and are all the subject of a planning application. One site is then much larger and is not yet the subject of a planning application, namely Lewisham College, which has a capacity of 450 homes. The question arises as to whether the Local Plan should allocate these sites, in order to make clear that they are supported and relied upon for housing supply purposes, and to ensure policy is in place to ensure effective/timely delivery. However, there is a pragmatic need to draw a line in respect of amendments to the plan, and the Inspectors specifically address Lewisham College in their Post Hearings Letter of 8th November 2024, stating: "We note the additional windfall site identified at the former Lewisham College site at Deptford Bridge which could contribute around 450 dwellings which is subject to pre-application consultation. If this site were to come forward it would provide greater flexibility in terms of the housing land supply."

Site allocation	Proposed main modifications
Land at Conington Road and Lewisham Road (Tesco)	Boost capacity by 44 homes and significant change to phasing (reduction of 181 homes in the first five years). N.B. similar to the interim position prior to hearing sessions.
Lewisham Retail Park, Loampit Vale	Significant change to phasing , with a reduction of 400 homes in the first five years.
110-114 Loampit Vale	-
Silver Road and Axion House	-
House on the Hill, Slaithwaite Road	-
Church Grove Self-Build *	-
Ladywell Play Tower	-
PLACE/Ladywell (Former Ladywell Leisure Centre)	-
Driving Test Centre, Nightingale Grove	-
Land at Nightingale Grove and Maythorne Cottages	Boost capacity by five homes, no change to phasing.
Land at Rushey Green and Bradgate Road (Aldi)	-
Catford Shopping Centre and Milford Towers	Significant change to phasing , with a reduction of 400 homes in the first five years. N.B. the interim position prior to hearing sessions involved a push back of 200 homes.
Catford Island	Significant change to phasing , with a reduction of 352 homes in the first five years.
Laurence House and Civic Centre	-
Wickes and Halfords, Catford Road	-
Ravensbourne Retail Park	Boost capacity by 94 homes.
North area	
Convoys Wharf MEL	Minor change to phasing (same number of homes but slower delivery in the first five years).
Deptford Landings MEL and Scott House	Reduce in capacity by 67 homes and significant change to phasing, with an increase of 318 homes in the first five years.
Evelyn Court LSIS *	Boost capacity by 58 homes, no change to phasing. N.B. similar to the interim position prior to hearings.
Neptune Wharf MEL	-
Surrey Canal Road and Trundleys Road LSIS *	Boost capacity by 60 homes, minor change to timing (same number of homes and a faster delivery in the first five years).
Apollo Business Centre LSIS *	Minor change to phasing (same number of homes but slower delivery in the first five years).
Silwood Street	Minor change to phasing (push back into the first five years).

Site allocation	Proposed main modifications
Surrey Canal Triangle MEL	Boost capacity by 8 homes and minor change to phasing (faster delivery towards the end of the plan period).
Corner of Besson and Briant Street	Change to phasing (push back into the first five years).
Former Hatcham Works, New Cross Road	Minor change to phasing (push back delivery).
Goodwood Road and New Cross Road	Minor change to phasing (push back delivery).
Achilles Street *	Reduce capacity by 35 homes and significant change to phasing , with 81 homes fewer in the first five years. N.B. somewhat similar to the interim position prior to hearings.
Amersham Vale, Former Deptford Green School (Upper School Site)	-
Albany Theatre	Significant change to phasing (reduction of 119 homes in the first five years).
North of Reginald Rd and South of Frankham St (Former Tidemill Sch.)	Minor change to phasing (bring forward to prior first five years).
Lower Creekside LSIS (Includes 1 Creekside) *	Boost capacity by 120 homes and significant change to phasing, with an increase of 46 homes in the first five years.
Sun Wharf MEL (including Network Rail Arches)	Minor change to phasing (the same number of homes but slower delivery in the first five years).
Creekside Village East, Thanet Wharf MEL	-
East area	
Heathside and Lethbridge Estate	Delivery now prior to the first five years.
Blackheath Hill LSIS	-
Leegate Shopping Centre *	Minor change to timing (same number of homes but slower delivery in the first five years).
Sainsbury's Lee Green	Boost capacity by 45 homes and minor change to phasing.
Land at Lee High Road and Lee Road	-
Southbrook Mews	-
Mayfields Hostel, Burnt Ash Road *	Reduce capacity by 1 home.
Sainsbury Local and West of Grove Park Station	-
South area	
Former Bell Green Gas Holders and Livesey Memorial Hall	Boost capacity by 74 homes and significant change to phasing (increase of 74 homes in the first five years).
Bell Green Retail Park	Minor change to phasing.
Sainsbury's Bell Green	-
Stanton Square LSIS	Minor change to phasing.

Site allocation	Proposed main modifications
Sydenham Green Group Practice and 86-92 Bell Green *	Boost capacity by 19 homes.
Worsley Bridge Road LSIS	Minor change to phasing.
Lidl, Southend Lane	-
Land at Pool Court	Boost capacity by 1 gypsy and traveller pitch.
Catford Police Station	Boost capacity by 30 homes.
Homebase / Argos, Bromley Road	Minor change to phasing.
Beadles Garage	-
Downham Co-op	-
Excalibur Estate	Minor change to phasing (same number of homes but slower delivery in the first five years).
Bestway Cash and Carry	-
West area	
111 - 115 Endwell Road	Minor change to phasing.
6 Mantle Rd	Boost capacity by 26 homes and significant change to phasing (increase of 46 homes in the first five years).
Jenner Health Centre	Boost capacity by 6 homes.
Land at Forest Hill Station East	Minor change to phasing.
Land at Forest Hill Station West	Minor change to phasing.
Perry Vale LSIS	-
Clyde Vale LSIS	Minor change to phasing.
Featherstone Lodge, Eliot Bank	Minor change to phasing.
Willow Way LSIS	Boost capacity by 35 homes and minor change to phasing (same number of homes but faster delivery in first five years).
74-78 Sydenham Road	-
Land at Sydenham Road and Loxley Close	-
113 to 157 Sydenham Road	Minor change to phasing.