

**Appendix G Lewisham Local Plan: Track  
change version at Modifications Stage  
(January 2025)**

# **LEWISHAM LOCAL PLAN**

**An Open Lewisham as part of an Open London**

~~**Proposes submission document – Regulation 19 stage  
January 2023**~~

**Proposed Modifications January 2025**

References to page numbers correspond to the published Regulation 19 Draft Local Plan Document. Page numbering will be finalised in the adopted Local Plan.

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# Consultation information

## Consultation overview

The Lewisham Local Plan: Proposed Submission document is being consulted upon under Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended. The new Local Plan will establish a future vision for Lewisham, along with the planning and investment framework to deliver this vision over a 20-year period (2020 to 2040). The Local Plan, together with the London Plan and Neighbourhood Plans, forms the statutory Development Plan for

Lewisham, and they are used to assess all planning applications across the borough. This document is the Lewisham Local Plan, as proposed to be submitted to the Secretary of State for independent examination.

## Next Steps

The Council is inviting comments on the soundness of the Lewisham Local Plan: Proposed Submission version from all those with an interest in the borough. Plans are 'sound' if they are positively prepared, justified, effective and consistent with national policy.

The Council is also inviting comments on a number of supporting documents which have been prepared to support the Local Plan. All personal information will be processed in accordance with the General Data Protection Regulations 2018.

## Consultation documents, supporting documents

and information such as further details about the Regulation 19 consultation and an explanation of the test of soundness can be accessed and viewed online, by visiting:

• <https://consultation.lewisham.gov.uk/planning/reg19consultation>

or

• <https://lewisham.gov.uk/myservices/planning/policy/planning/current-and-future-consultations>

Copies of the Lewisham Local Plan: Proposed Submission version can also be inspected in the following places:

- Laurence House, Catford
- Catford Library
- Lewisham Library
- Deptford Lounge Library
- Forest Hill Community Library
- Downham Library
- Grove Park Community Library

## When and how to respond

The public consultation on the Lewisham Local Plan: Proposed Submission document will run from Wednesday 1st March 2023 to Tuesday 25<sup>th</sup> April 2023.

~~Comments must be received no later than 12 midnight on Tuesday 25th April 2023.~~

~~You can take part in the consultation by sending us your comments via written representations or by completing the on-line questionnaire.~~

~~To make a written representation please do so by submitting to:~~

~~Email~~

~~localplan@lewisham.gov.uk~~

~~Post~~

~~Local Plan~~

~~Lewisham Planning Policy Team~~

~~London Borough of Lewisham~~

~~Laurence House~~

~~1 Catford Rd, Catford,~~

~~London, SE6 4RU~~

## Preface

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

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

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

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

# PART ONE

# PLANNING FOR AN OPEN LEWISHAM

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# An Open Lewisham as part of an Open London

- 1.1. Lewisham's Local Plan sets out a shared vision for the future of the Borough along with the planning and investment framework to deliver this vision through to 2040.
- 1.2. This Local Plan has been prepared to ensure there is a clear framework in place to manage growth and deliver sustainable development in a way that respects the distinctive character and diversity of the Borough and its people. It will help to ensure that planning and investment decisions help to meet local needs, respond to the aspirations of our communities and contribute to inclusive, safe, healthy and liveable neighbourhoods.
- 1.3. The concept of 'Good Growth' underpins the London Plan (2021). Good Growth is growth that is socially and economically inclusive and environmentally sustainable<sup>1</sup>. Sitting alongside this is the Mayor of London's ambition for the Capital to be 'A City for all Londoners'. The main objective of this Local Plan for 'An Open Lewisham as part of an Open London' responds to these aspirations recognising that Lewisham is an integral part of London.
- 1.4. The successful delivery of the Local Plan will require strong and effective partnership working. The Council will continue to take a leadership role in planning positively for the Borough and ensuring equality of opportunity. Through our unique ways of working, known as the 'Lewisham Way', we will work with and alongside public and private sector stakeholders, local communities and community groups as well as local residents to realise the Local Plan objectives, so that everyone in Lewisham can enjoy a good quality of life.

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<sup>1</sup> The London Plan (2021), paragraph 0.0.18

## The planning framework

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

### National planning policy and the London Plan

- 1.6. The Local Plan is required to be consistent with national policy, including the National Planning Policy Framework (NPPF) (2021) and planning Circulars. The NPPF sets out the Government's planning policies for England and how they should be applied. It includes parameters for the preparation of local plans and is also a material consideration in planning decisions. The NPPF is supported by National Planning Practice Guidance (NPPG).
- 1.7. The Local Plan must also be in general conformity with the regional planning policies contained in the London Plan, which is produced by the Mayor of London. The London Plan is the Spatial Development Strategy for Greater London. It helps to ensure a coordinated approach to planning across all boroughs. The London Plan forms part of Lewisham's development plan, meaning it must be taken into account in planning decisions. The London Mayor also prepares Supplementary Planning Guidance (SPG) documents that support implementation of the London Plan.

### Lewisham's development plan

- 1.8. Lewisham's statutory development plan consists of the Local Plan along with the London Plan and adopted neighbourhood plans. Planning applications must be determined in accordance with the development plan, unless material considerations indicate

otherwise<sup>2</sup>. The diagram below illustrates how the Local Plan and its supporting documents sit within the wider planning framework.

- 1.9. Once adopted Lewisham's new Local Plan 2020- 2040 will replace the Core Strategy (2011), Site Allocations Local Plan (2013), Development Management Local Plan (2014) and Lewisham Town Centre Local Plan (2014).

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<sup>2</sup> Planning and Compulsory Purchase Act 2004, Section 28 (6).

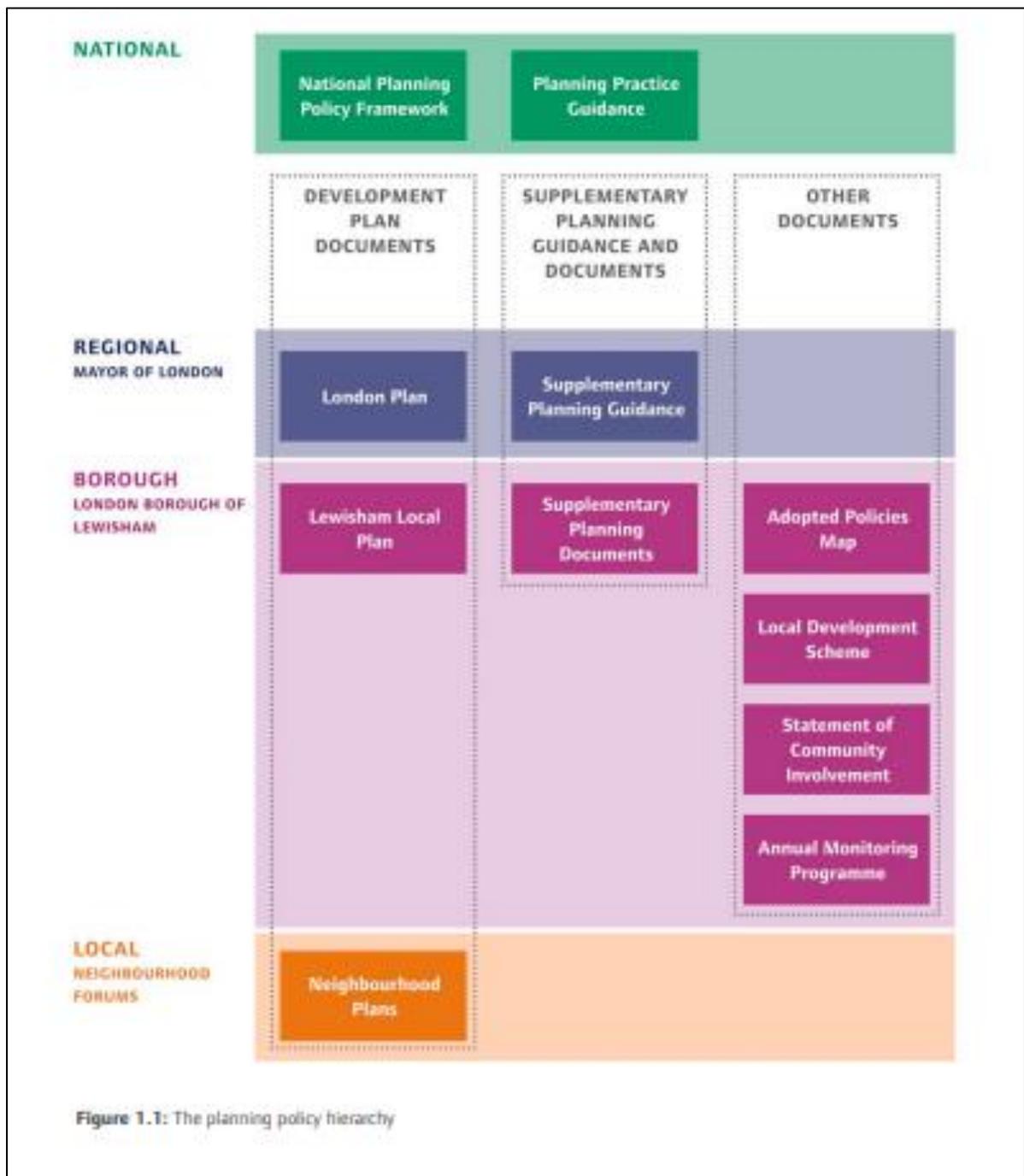


Figure 1.1: The planning policy hierarchy

# How the plan has been prepared

## Key stages

- 1.10. There are a number of stages involved in the preparation of a local plan along with procedures that the Council is required to comply with throughout. These stages and requirements are prescribed by national policy and legislation. This includes the undertaking of multiple rounds of public consultation before a draft local plan can be submitted to the Secretary of State for independent public examination.
- 1.11. Figure 1.2 sets out the key stages of the plan making process, highlighting the current stage of production<sup>3</sup>.

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<sup>3</sup> These reflect the key stages of the plan-making process as set out in The Town and Country (Local Planning) (England) Regulations 2012, as amended.



Figure 1.2 Key stages of the plan making process

October – November 2015

Consultation on Main Issues.

(Regulation 18)

Up to October 2020

Pre-production (with community and stakeholder engagement).

January - April 2021

Consultation on the Main Issues and Preferred Approaches.

(Regulation 18)

Autumn 2022 March- April 2023

Publication of the Local Plan / consultation on the 'proposed submission document'  
(Regulation 19)

Winter 2022/2023 November 2023

Submission to the Secretary of State and Examination in Public  
(Regulations 22-25)

Summer – Autumn 2023 Summer 2025

Adoption by Council.  
(Regulation 26)

## Evidence base

- 1.12. The evidence base is made up of studies and supporting documents that inform the preparation of the new Local Plan. These have been prepared both by the Council and other organisations, including government bodies. The evidence base helps to ensure that the approaches and policies in the Local Plan are appropriate and justified, taking into account the latest available information.
- 1.13. Our evidence base comprises technical studies, research reports, site and area masterplans and other information covering a variety of policy topic areas. We have consulted local communities and other stakeholders on the preparation of some evidence base documents. This includes the Lewisham Characterisation Study (2019), the New Cross Area Framework (2019), Catford Town Centre Framework (2021) and A21 Development Framework (2022). The evidence base documents are available on the Council's website.

## Integrated Impact Assessment

- 1.14. An Integrated Impact Assessment (IIA) helps to inform the preparation of the Local Plan. It is a detailed analysis of the potential environmental, social and economic effects of the plan. The IIA brings different types of assessment together into a single process, including:
  - Strategic Environmental Assessment (SEA)
  - Sustainability Appraisal (SA)
  - Equalities Impact Assessment (EqIA)
  - Health Impact Assessment (HIA)
- 1.15. The IIA is undertaken as an iterative process during the plan's preparation. It includes assessments of preferred policy approaches and reasonable alternatives. Reports are published and consulted on at key stages in the plan process, often alongside draft Local Plan documents. The IIA helps to identify potential issues at an early stage so that measures to avoid or mitigate harm, and improve expected outcomes, can be incorporated into the plan.

- 1.16. A separate Habitats Regulations Assessment (HRA) is also carried out to assess whether protected habitats and species may be adversely impacted by the plan's implementation<sup>4</sup>.

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<sup>4</sup> Designated under European Union council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance

## Tests of soundness

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

### Duty to Cooperate

- 1.18. The Localism Act (2011), subsequent regulations and the NPPF place a statutory duty on local planning authorities to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans. The Council has and will continue to work positively with its neighbouring authorities and other relevant public bodies to identify and address issues of strategic importance during the preparation and implementation of Lewisham’s new Local Plan.

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

<b>Tests of Soundness for Local Plans (NPPF, paragraph 35).</b>	
Positively prepared	Providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from the neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development
Justified	An appropriate strategy, taking into account the reasonable alternative, and based on proportionate evidence.
Effective	Deliverable over the plan period, and based on effective joint

	working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidence by the statement of common ground.
Consistent with national policy	Enabling the delivery of sustainable development in accordance with the policies in this Framework.

## How to use the plan

- 1.19. The Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the twenty-year period from 2020 to 2040. The plan will help to support implementation of the London Plan and its Good Growth policies.
- 1.20. For legibility the Local Plan is set out in five main parts and sub-sections that cover a range of thematic policy areas however it must be read as a whole. The order of topics and policies is not a reflection of their weight or importance<sup>5</sup>.
- 1.21. The Local Plan is organised into five main parts:



<sup>5</sup> This also applies to the Key Spatial Objectives and policies for each of the character areas set out in Part 3 of the Local Plan.

## Strategic and nonstrategic policies

- 1.22. The Council is legally required to identify the strategic priorities for the development and use of land in the Borough, and to set out policies to address these in the local plan<sup>6</sup>. The NPPF also makes clear that local plans should identify and clearly distinguish strategic policies from other non-strategic policies<sup>7</sup>. A schedule of the Local Plan non-strategic policies is included in Part 5 of the Local Plan. ~~Those policies not included in the schedule are strategic policies.~~

### Community engagement and neighbourhood planning

- 1.23. We will continue to work with local communities and community groups, including residents' groups and amenity societies, to improve transparency and openness in decision-making, and to foster greater public understanding of and involvement in the planning process. Further information on the Council's procedures for public consultation on planning decisions is set out in the Statement of Community Involvement (SCI), which is available on our planning webpage.
- 1.24. The Council has a statutory duty to support designated neighbourhood forums in the preparation of neighbourhood plans. We will work positively with forums to ensure their plans appropriately support the Council's strategic planning priorities, so that they have the best chance of succeeding at the examination stage and can be formally adopted. This Local Plan is presented in a new format that responds to the strong interest in neighbourhood planning in Lewisham. For example, Part Three sets key objectives and priorities for the Borough's character areas. It provides a useful reference point from which neighbourhood forums, and other community groups, can work to support the Local Plan's implementation.

- 1.25. Neighbourhood plans are required to be consistent with the strategic policies in Lewisham's development plan and should only include non-strategic policies, as set out in the NPPF. [The Council publishes details of the Borough's emerging and made neighbourhood plans on its website - Lewisham Council -](#)

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<sup>6</sup> Planning and Compulsory Purchase Act 2004, Section 39(2).

<sup>7</sup> NPPF (2019), paragraph 21.

Neighbourhood plans. At the Local Plan's adoption, the Borough's neighbourhood planning position was as follows:

- Bell Green – a neighbourhood area has been designated around the Bell Green gyratory, following an application for a Neighbourhood Area and Forum.
- Corbett Estate Neighbourhood Forum and Area – in 2015 the Mayor of Lewisham designated the Corbett Estate as a neighbourhood area and has also designated a neighbourhood forum for this area. These have subsequently lapsed.
- Crofton Park and Honor Oak Park – a referendum on the Crofton Park and Honor Oak Park Neighbourhood Plan was held and the Plan was adopted in May 2022.
- Deptford Neighbourhood Action neighbourhood forum and area - the Mayor of Lewisham designated the Deptford Neighbourhood Action community group (DNA) as a neighbourhood forum and area in February 2016. These have subsequently lapsed.
- Grove Park - a referendum on the Grove Park Neighbourhood Plan was held and the Plan was adopted in August 2021.
- Lee - a referendum on the Lee Neighbourhood Plan was held and the Plan was adopted in February 2024.
- Sydenham Hill Ridge – a neighbourhood area and forum has been designated.

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Figure 2.1 Lewisham borough map

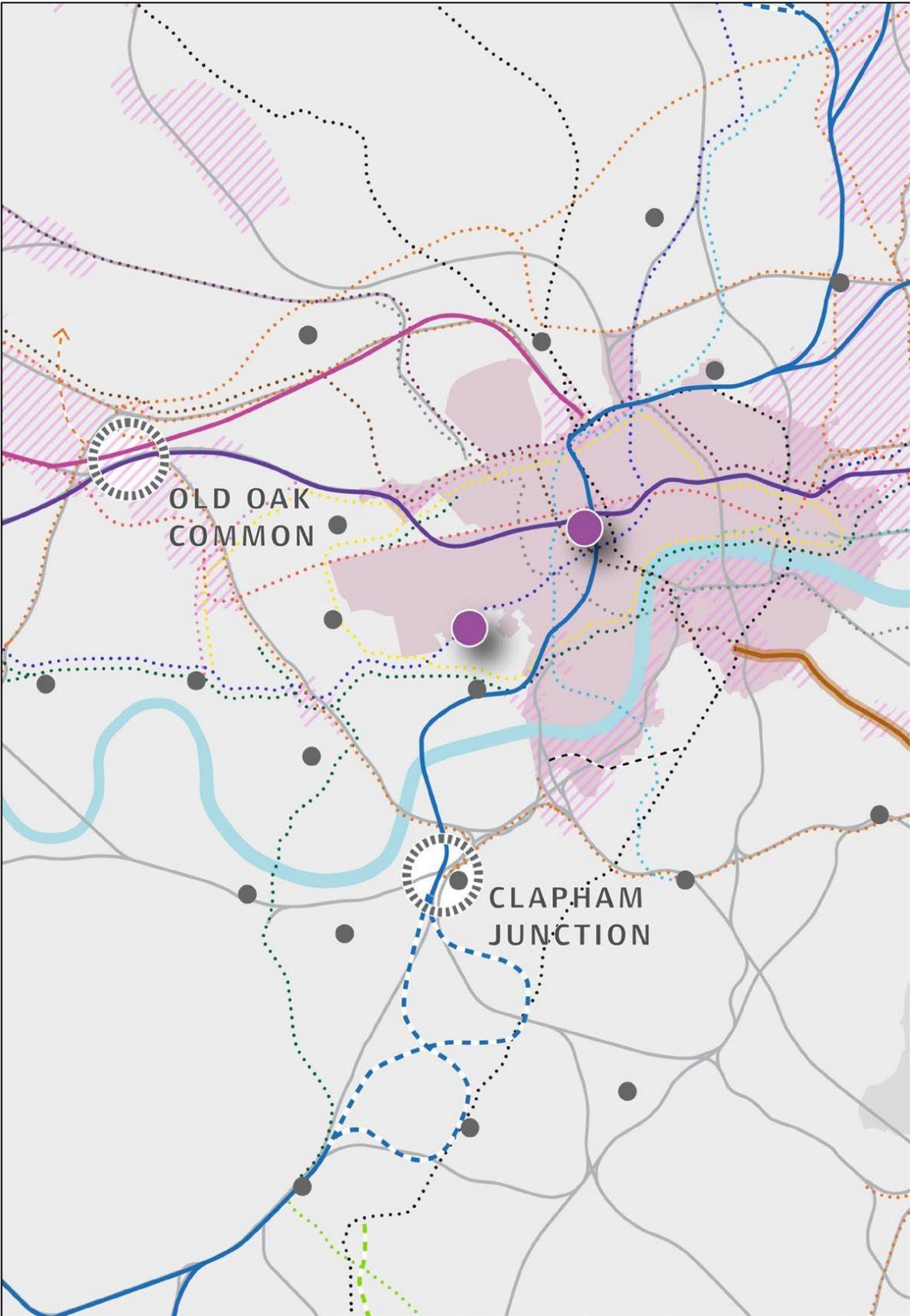
## Introduction

- 2.1. This section provides an overview of Lewisham in the context of London. It draws on the latest available information to provide a snapshot of the Borough and its people looking at the current situation and considering future trends. This information highlights some of the main challenges and opportunities for the Local Plan to address.

### Lewisham in context

## Location

- 2.2. Lewisham is an inner-London borough located to the south of the River Thames. As shown in Figure 2.2 it has good transport links to the rest London, including the Central Activities Zone, along with connections to the wider South East of England. Lewisham is bordered to the north by the Thames and the London boroughs of Southwark to the west, Greenwich to the east and Bromley to the south.



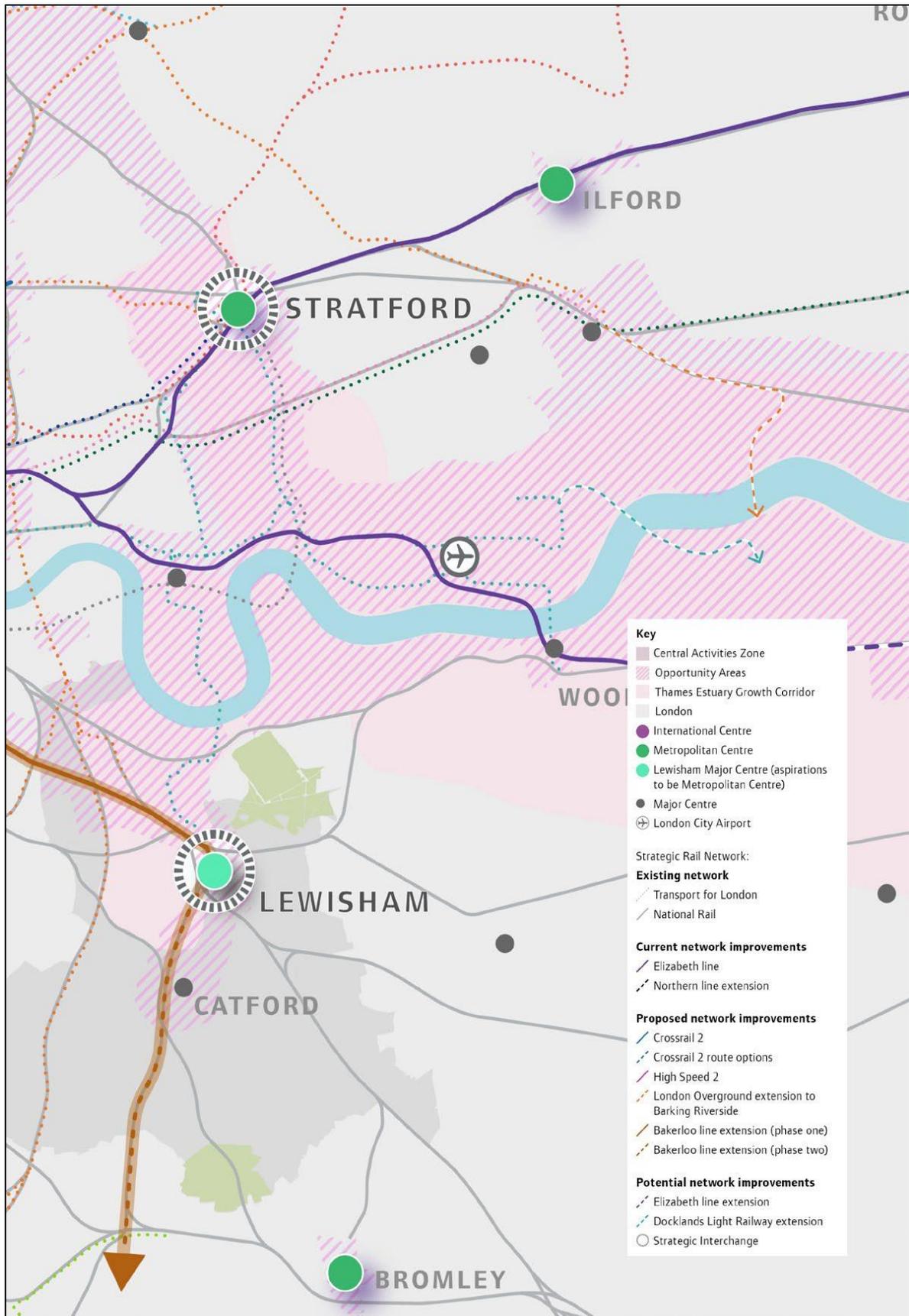


Figure 2.2: Lewisham in context

## Population

- 2.3. Like London, Lewisham has experienced a sustained period of population growth. The Borough's population grew from 248,900 in 2001<sup>8</sup> to an estimated 306,950 people in 2020<sup>9</sup>, an increase of roughly 23 per cent over the last 20 years. Whilst Brexit and the Covid-19 pandemic have had short-term impacts on migration patterns research suggests that London will continue growing over the long-term<sup>10</sup>. Lewisham's population is forecast to rise by some 42,400 people or 14 per cent by 2040<sup>11</sup>.
- 2.4. Lewisham has a relatively young population. One-quarter of residents were less than 20 years old at the time of the 2011 Census. However older people are the fastest growing demographic group in London. The number and proportion of people aged 65 or more is expected to rise sharply over the next decades, including in Lewisham<sup>12</sup>.
- 2.5. Lewisham is one of the most ethnically diverse places in the country. Some 46 per cent of residents identify themselves as having Black, Asian and Minority Ethnic (BAME) heritage<sup>13</sup>. This rises to 76 per cent for the school population<sup>14</sup> with more than 170 languages spoken by students in the Borough<sup>15</sup>. The electoral roll shows that Lewisham is home to residents of 75 nationalities.

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<sup>8</sup> Office for National Statistics. Census 2001

<sup>9</sup> Greater London Authority. 2019-based BPO Population Projections.

<sup>10</sup> Greater London Authority. 2020-based Population Projection Results: A summary of the GLA 2020-based trend and housing-led demographic projections (2021).

<sup>11</sup> Greater London Authority. 2019-based BPO Population Projections.

<sup>12</sup> Centre for London. London: A place for older people to call home. Joe Wills and Erica Belcher. (2020) and Lewisham SHMA (2022).

<sup>13</sup> Office for National Statistics. Census 2011.

<sup>14</sup> Lewisham Corporate Strategy 2018-2022.

<sup>15</sup> School Language Census (2018).

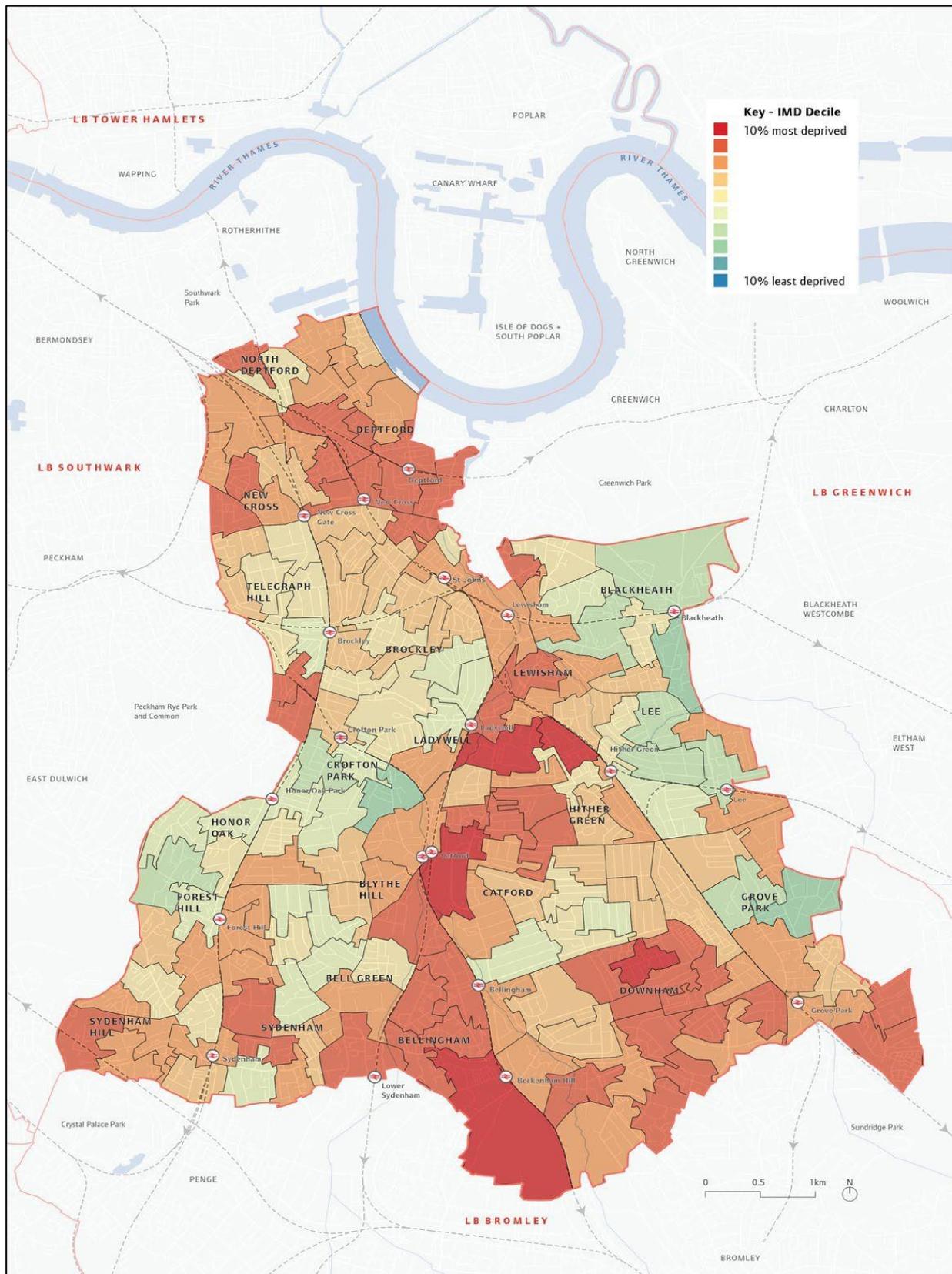


Figure 2.3: Levels of deprivation in Lewisham

## Deprivation and inequality

- 2.6. Lewisham is a place of stark contrasts in so much as it contains areas of wealth as well as deprivation, as shown in Figure 2.3. Whilst overall levels of deprivation in Lewisham have declined over the past decade it continues to rank amongst the 20 per cent most deprived local authority areas in the country and is the 7th most deprived in London<sup>16</sup>. Child poverty is a significant issue with some of the highest levels in the country<sup>17</sup>.
- 2.7. Life expectancy at birth for Lewisham male residents remains below the national average, although for females this now exceeds the national average<sup>18</sup>. There are significant differences in life expectancy between the most and least deprived wards. Further, research points to the disparities in impacts of Covid-19 on health and wellbeing, with proportionally higher risks for BAME groups<sup>19</sup>. This data reflects the situation of health inequalities across the Borough given its population profile.
- 2.8. Physical activity is a key determinant of health and wellbeing as obesity is linked to many serious risks. More than half of Lewisham's adult population is overweight or obese. Whilst the proportion of physically active adults is in line with the national average, roughly 16 per cent of adults are physically inactive. Childhood obesity is also a concern. Some 22 per cent of school children in Reception are overweight or obese, rising to 38 per cent in Year 6. Children living in the Borough's most deprived areas are twice as likely to be obese or overweight as other children<sup>20</sup>.

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<sup>16</sup> Ministry of Housing, Communities and Local Government. English Indices of Deprivation 2019

<sup>17</sup> Lewisham Poverty Commission. Working Together to Tackle Poverty in Lewisham (2017)

<sup>18</sup> Lewisham Joint Strategic Needs Assessment. Picture of Lewisham (2021).

<sup>19</sup> Public Health England. Beyond the data: Understanding the impact of Covid-19 on BAME groups (2020).

<sup>20</sup> Lewisham Joint Strategic Needs Assessment. Picture of Lewisham (2021).

## Heritage and character

- 2.9. The historical growth of Lewisham has led to a range of distinctive neighbourhoods served by a number of commercial centres, each with its own unique character and community. There are contrasts between the preindustrial cores of Blackheath, Deptford and Lewisham in the north of the Borough, the mixed residential neighbourhoods surrounding them and the interwar growth that characterises much of the south of the Borough. Other notable phases of development include the building of post-war estates along with modern commercial blocks and towers.
- 2.10. Lewisham has a rich and varied historic environment. This includes landscapes, river corridors, parks and open spaces, buildings and structures, urban spaces and the features within them, along with archaeological remains both buried and above ground. The historic environment encapsulates the social and cultural history of Lewisham, its communities and people. The Borough contains over 600 statutory listed buildings, 29 Conservation Areas and the buffer zone of the Maritime Greenwich World Heritage Site.

## Housing

- 2.11. Housing affordability is a critical issue for people in Lewisham. Median house prices have risen from £99,995 in 2000 to £430,000 in 2020, an increase of 330% over 20 years. This exceeds the rate of price growth for London during that time. When workplace earnings are factored to account for relative affordability of housing, Lewisham ranks as one of the least affordable boroughs in London. The cost of private renting remains lower than the London average but prices are rising rapidly. Over the period 2010 to 2020 median rents rose by 45 per cent, significantly higher than the rate for London and England<sup>21</sup>.
- 2.12. There has been a marked change in housing tenure. The private rented sector in Lewisham is growing, mirroring trends across London. The proportion of households with private rents increased from 14 per cent in 2001 to around 23 per cent in 2018. There are also notable variations between wards in terms of housing tenure mix.

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<sup>21</sup> Lewisham Strategic Housing Market Assessment (2022).

## Economy

- 2.13. Lewisham's economy is small and inward looking. There are just 40 jobs for every 100 working age residents, the second lowest proportion of all London boroughs. Local jobs are concentrated in public sector activities, such as health care and education, along with consumer services. Some 90 per cent of businesses are small business. Prior to the peak of Covid-19 the number of new businesses being formed in the Borough was rising but much of this was due to structural changes in the nature of work with higher levels of self-employment and contract work along with expansion of the gig economy. The creative and digital industries sector is one of the fastest growing in London, and Lewisham is now home to one of the Capital's first Creative Enterprise Zones<sup>22</sup>.
- 2.14. Commercial activity is largely focussed within the Borough's industrial locations and network of town centres. A significant amount of industrial capacity has been lost in Lewisham in recent years, and at a faster rate than the rest of London<sup>23</sup>. There is strong demand for workspace in employment areas and vacancy rates are low. However the limited supply and rising cost of workspace poses a challenge for business development<sup>24</sup>. Town centre vacancy rates have increased across the UK during Covid-19, rising to an average of 14 per cent. Lewisham's larger town centres have been affected by the pandemic as vacancy rates are now slightly above the national average<sup>25</sup>. Covid-19 has also accelerated the growth of online shopping and this is likely to have implications for town centres, particularly the future of traditional bricks and mortar retailing.

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<sup>22</sup> Lewisham Local Economic Assessment (2018).

<sup>23</sup> Lewisham Employment Land Study (2019).

<sup>24</sup> Lewisham Local Economic Assessment (2018).

<sup>25</sup> Lewisham Retail Impact Assessment and Town Centre Trends Report (2021)

## Green infrastructure

- 2.15. Lewisham is well-served by parks, open spaces (including waterways) and nature sites, with green spaces covering roughly one-fifth of the Borough. It ranked first amongst all London boroughs in the recent Good Parks for London report<sup>26</sup>. However there are areas within the Borough that are deficient in public access to open space and nature. There are opportunities to improve the quality of open spaces and nature sites along with the connections between them. Whilst 65 per cent of open spaces have been assessed as being of 'good' quality, 34 per cent are of 'fair' quality and 1 per cent 'poor'<sup>27</sup>.
- 2.16. Natural capital accounting assesses the environmental, social and economic value of green infrastructure. Research indicates that Lewisham accrues benefits of up to £2.1 billion from its network of green infrastructure<sup>28</sup>.

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<sup>26</sup> Lewisham Open Space Assessment (2019).

<sup>27</sup> Lewisham Open Space Assessment (2019).

<sup>28</sup> Good Parks for London 2021: Parks and Climate Change (2021).

## Environment

- 2.17. There is substantial evidence that climate change as a result of human activity is linked to increasing frequency and intensity of extreme weather events. It is broadly accepted as one of the key challenges now facing the world. Carbon emissions are a key contributory factor. In Lewisham they have fallen 38 per cent since 2005<sup>29</sup>. However action is required to further reduce emissions and achieve net carbon neutrality. Half of the Borough's carbon emissions come from energy used within homes with the remaining half split between transport and business<sup>30</sup>.
- 2.18. Lewisham's neighbourhoods and communities must be made more resilient to the effects of climate change, such as heat and flood risk. The Borough's position alongside the River Thames and within the Ravensbourne catchment puts people and properties at risk of flooding. As well, large parts of the Borough are prone to surface water flooding owing to their heavily urbanised nature.
- 2.19. Air quality is a significant public health issue across London. There are 6 Air Quality Management Areas in Lewisham, including two major areas, which have been declared for several pollutants. The highest concentrations of nitrogen/nitric oxides (NO<sub>x</sub>), NO<sub>2</sub> and Particulate Matter (PM) which currently breach the legal limits are found on the busiest main roads<sup>31</sup>. London's Ultra Low Emission Zone (ULEZ) was recently extended to cover parts of Lewisham, up to the South Circular (A205 road).

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<sup>29</sup> Department for Business, Industrial and Energy Strategy. UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2017 (2019).

<sup>30</sup> Lewisham Climate Emergency Action Plan 2020-2030 (2020).

<sup>31</sup> Draft Lewisham Air Quality Management Plan (2021).

## Transport and connectivity

- 2.20. Despite Lewisham's inner-London location not all of its areas are well-connected or benefit from good access to public transport. The northern and central neighbourhoods are generally better connected to the rest of London with access to the Overground, Docklands Light Rail (DLR) and mainline trains. Public transport access is comparatively poorer in parts of Deptford and neighbourhoods in the south east. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. There is no direct access to the Underground in Lewisham. However the London Plan commits to the delivery of the Bakerloo line extension, which will take it along Old Kent Road to New Cross Gate and beyond.
- 2.21. Cycling in Lewisham, and London on whole, has shown continued growth over the past decade. The number of daily trips made by cycle in the Borough is rising. However research indicates that only 7 per cent of 'potentially cyclable' trips in Lewisham are being made by cycle. Road safety is also an area of concern<sup>32</sup>.

## Health and Wellbeing

- 2.22. Securing improved and accessible infrastructure networks that support the continued health and wellbeing of residents and communities remains a key objective for successful and sustainable place-making across Lewisham. This is not limited to investment in conventional healthcare provision such as hospitals, surgeries, dentists, and clinics, and consequently the new Local Plan considers this a common thread throughout all of its content.
- 2.22.2.23. Nevertheless, it is acknowledged that Lewisham's residents and communities have distinct healthcare needs, such as those related to obesity, diabetes, hypertension and stroke and a higher rate of some mental health conditions, which can be addressed and overcome through investment in healthcare facilities. Consequently, place-making will seek to secure an appropriate level of provision for the required social infrastructure to support planned-for growth.

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<sup>32</sup> Lewisham Cycle Strategy (2017).

# 3 VISION, STRATEGIC OBJECTIVES AND THE SPATIAL STRATEGY

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## Vision for Lewisham

### 3.1. The Local Plan is focussed on realising the 'Vision for Lewisham':

Lewisham will continue to be a welcoming place where the culture and diversity of our people, and the unique qualities of local neighbourhoods, is recognised and protected. We will always celebrate what makes us different and have a strong sense of community. We will give people the security and certainty they need so that everyone can live their best lives. Lewisham will be a place where all generations not only live but also thrive. A place that people want to visit and live in, and where they choose to stay and enjoy a good quality of life. A place where you can get on, regardless of your background and where you are always treated fairly and are supported to achieve your full potential. Lewisham will continue to be a dynamic place, reflecting the strength of its communities, and partnership working with our community remains at our core. We are proud of the vibrancy of our high streets, local businesses, arts and cultural establishments, our evening and night-time economy and our world renowned institutions. We will not only protect them but grow them. We will contribute to and share in more of London's future prosperity, becoming a greener, healthier and more resilient place by leading the way in responding to the global climate emergency. Most of all, we want you to love living in Lewisham.

## Strategic objectives

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

Table 3.2: Lewisham Local Plan – Strategic objectives

<b>A AN OPEN LEWISHAM AS PART OF AN OPEN LONDON</b>	
1	Sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places. Coordinate investment in such a way as to promote equality of opportunity and for everyone to enjoy a good quality of life in Lewisham.
<b>B HOUSING TAILORED TO THE COMMUNITY WITH GENUINLEY AFFORDABLE HOMES</b>	
2	Proactively respond to population growth and help to meet London's and Lewisham's housing needs by positively managing the delivery of new homes across the Borough.
3	Ensure Lewisham's existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing, which is tailored to meeting the varied needs of the community. This includes the needs of those from all age groups and at different stages of life, families and those with specialist housing requirements.
4	Foster, and help to reinforce community cohesion through the provision of housing that enables people to both settle in the local area and remain rooted to it.
<b>C A THRIVING LOCAL ECONOMY THAT TACKLES INEQUALITIES</b>	
5	Strengthen Lewisham's role in the wider London economy by expanding the local business base. Steer investment to town centres and other employment hubs and support the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries. Enable the development of green industry and promote the greening of existing industries to reduce their environmental impacts and support the transition to a low carbon, circular economy.
6	Increase the number and variety of local jobs and business opportunities by making the best use of employment land and providing suitable space to support businesses of all sizes, along with securing affordable workspace and workplace training opportunities.
7	Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail and other commercial, leisure and cultural activities whilst promoting a thriving evening and night-time economy. Coordinate investment to

	secure Lewisham Major Centre's future role as a regionally important Metropolitan Centre, enable the regeneration in Catford Major Centre into London's greenest, and to support the vitality and viability of town centres elsewhere.
<b>D A GREENER BOROUGH</b>	
<b>8</b>	Build on London's National Park City status and ensure all people in Lewisham, including local residents, benefit from access to high quality green spaces by protecting, enhancing and connecting the Borough's network of parks, open and water spaces. This includes the delivery of a Green Grid which improves linkages to and between these spaces.
<b>9</b>	Promote and protect the ecological, biodiversity and amenity value of the Borough's natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise. Address the decline in the number and distribution of species and deliver Biodiversity Net Gain across the Borough.
<b>10</b>	Manage waste responsibly by prioritising implementation of the most sustainable options in the waste hierarchy and safeguarding appropriate sites for the Borough to meet its strategic waste apportionment requirement.
<b>E RESPONDING TO THE CLIMATE EMERGENCY</b>	
<b>11</b>	Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050. Increase the use of sustainable transport modes (including walking and cycling) and ensure that new development is designed to reduce car use, maximise energy efficiency, and integrate greening measures to limit the urban heat island effect.
<b>12</b>	Manage flood risk by ensuring that new development is appropriately located, implementing Sustainable Drainage Systems, retaining and enhancing flood defences including through river restoration works. Improve the ecological and water quality of the rivers Thames, Ravensbourne, Quaggy and Pool and their corridors.
<b>G HEALTHY AND SAFE COMMUNITIES</b>	
<b>16</b>	Address the wider determinants of physical and mental health and deprivation in an integrated and systematic way to improve the wellbeing of the population, to reduce health and other inequalities particularly where these are

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

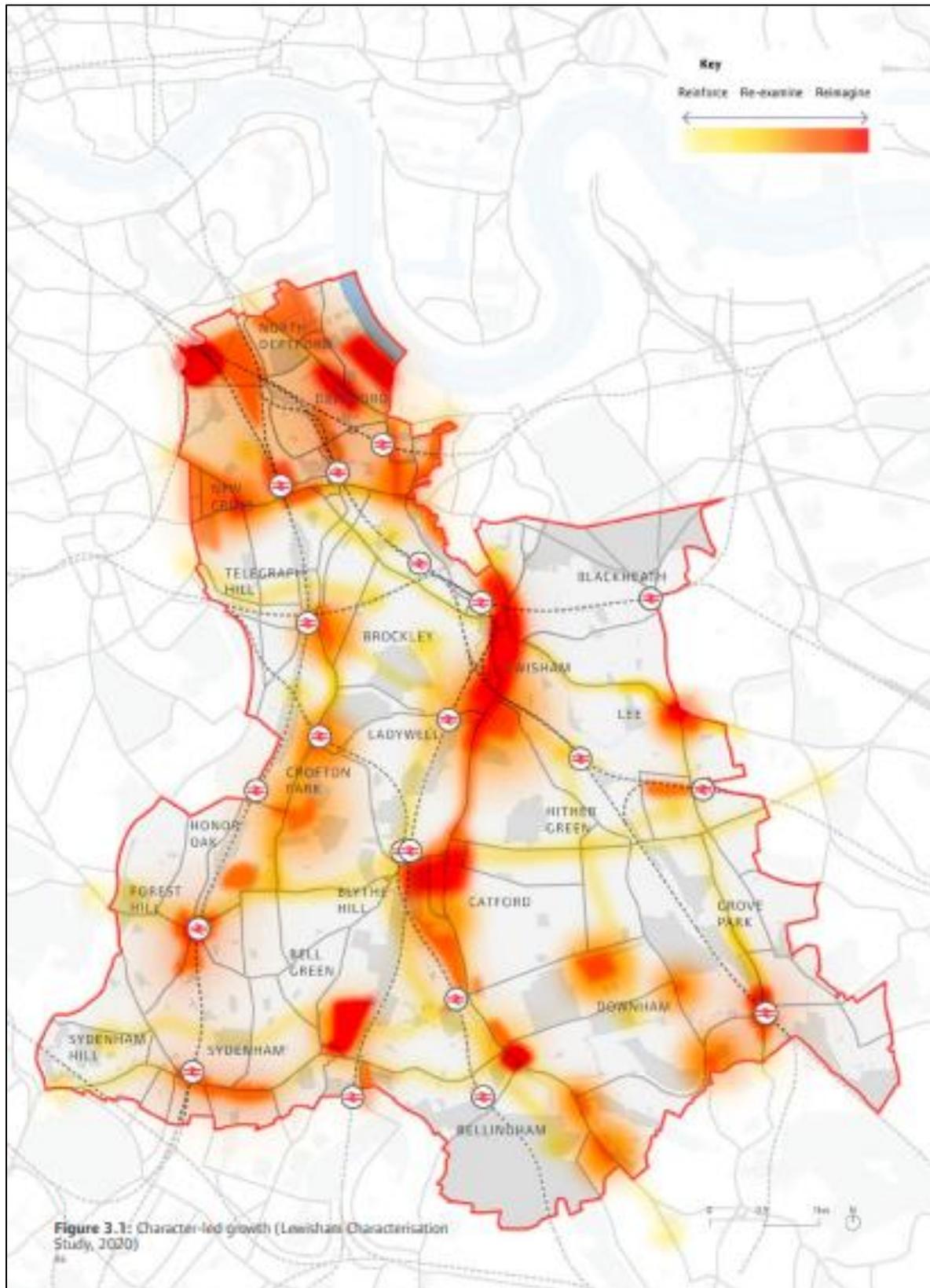


Figure 3.1 Character-led growth (Lewisham Characterisation Study, 2020)

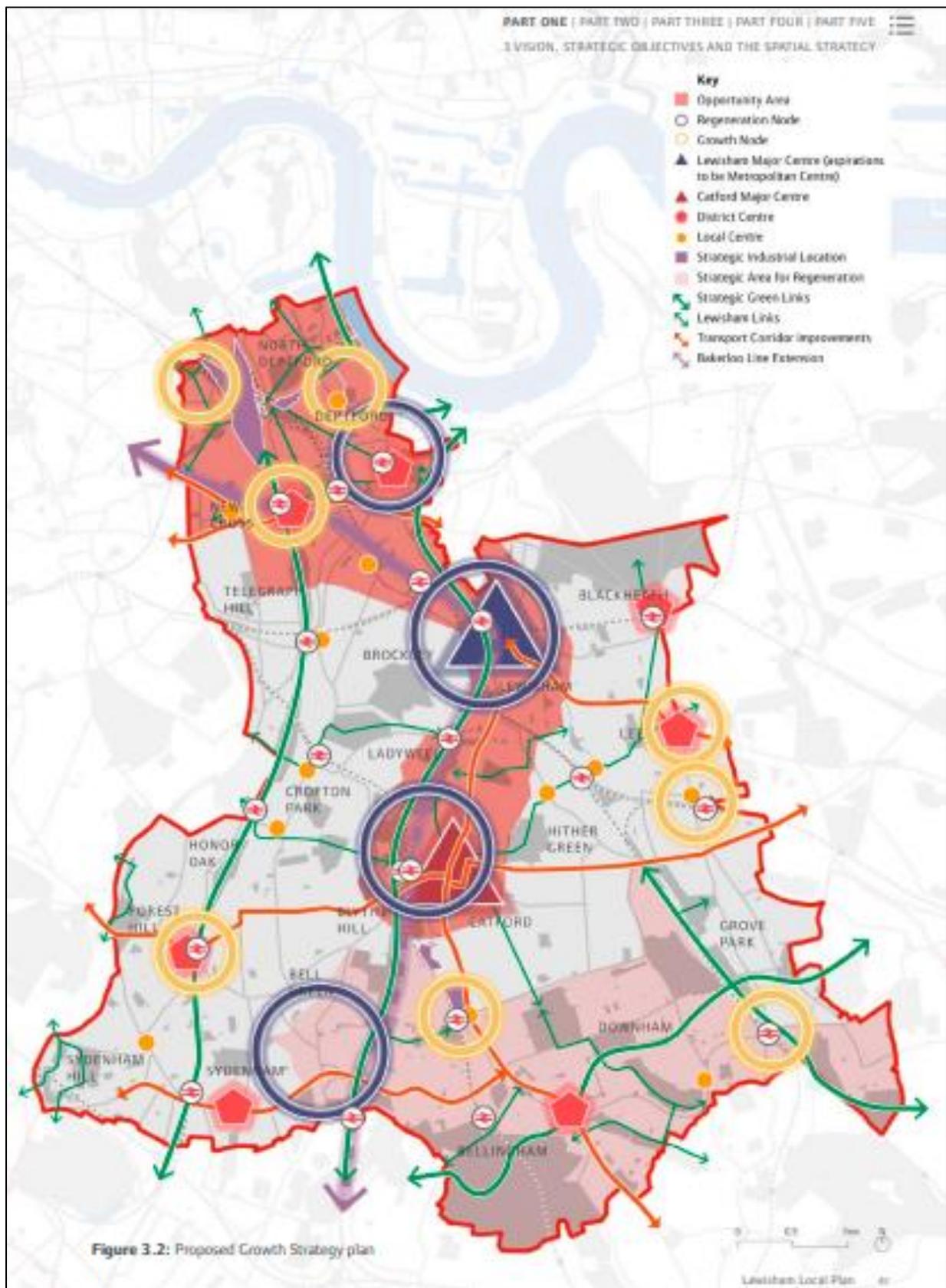


Figure 3.2: Proposed Growth Strategy plan Amend Figure 3.2 to delete reference (in legend) to Transport Corridor Improvements and replace with Growth Corridor.

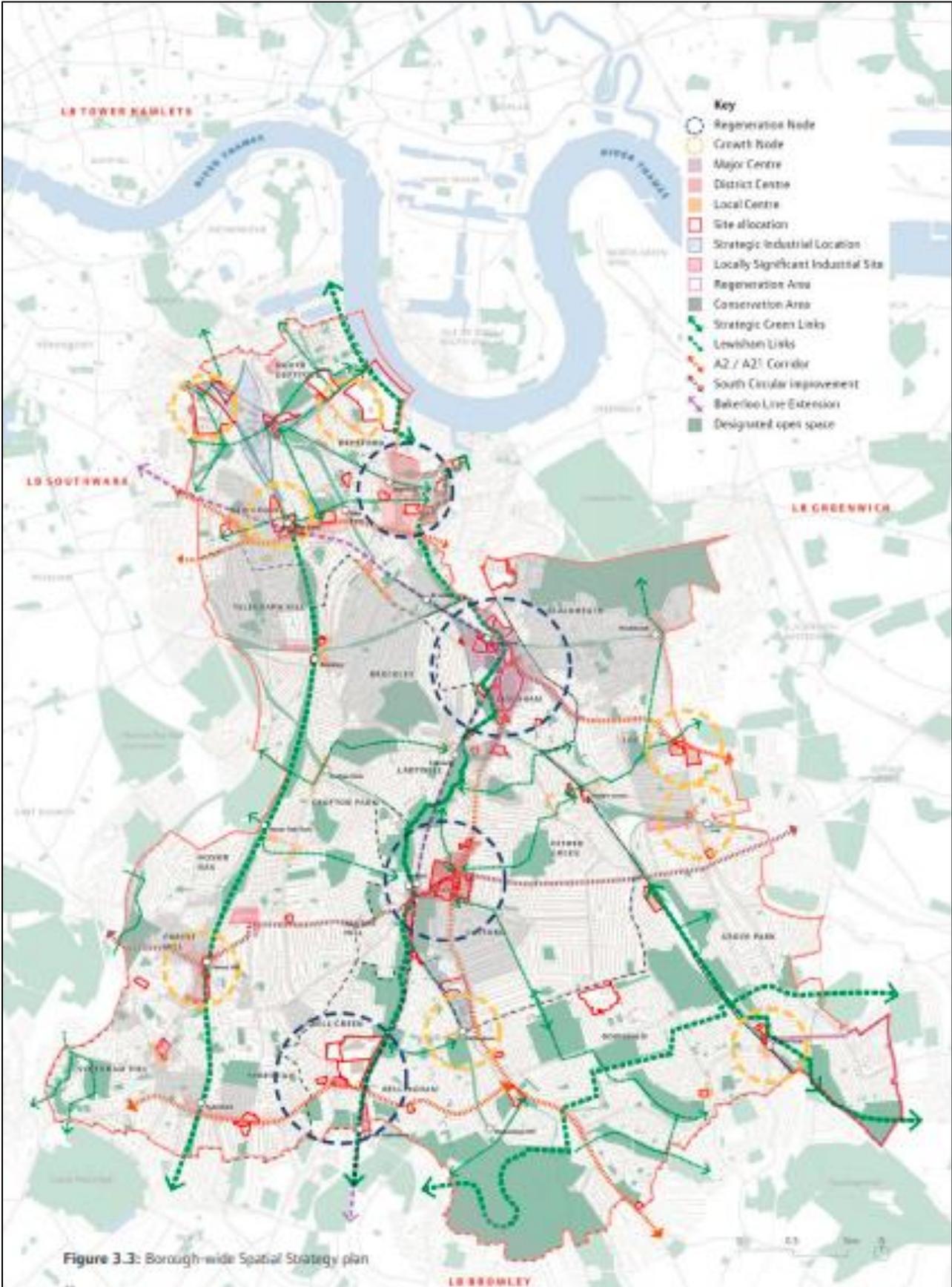


Figure 3.3: Borough-wide Spatial Strategy plan [Amend Figure 3.3 Spatial Strategy to include Opportunity Areas and Strategic Areas of Regeneration.](#)

# OL1 Delivering an Open Lewisham (spatial strategy)

## Strategic Policy

### Strategic Objectives:

A An open Lewisham as part of an open London Borough of Lewisham,

B Housing tailored to the community with genuinely affordable homes,

C A thriving local economy that tackles inequalities,

D A greener borough,

E Responding to the climate emergency,

F Celebrating our local identity,

G Healthy and safe communities,

H Securing the timely delivery of infrastructure,

I Ensuring high quality education, health and social care.

- A-** The Council will work positively and alongside local communities, community groups, and other public and private sector stakeholders to realise the Vision for Lewisham and to address the strategic objective for 'An Open Lewisham as part of an Open London'. Good Growth will be delivered in the Borough by:
- a. Directing new development to Growth Nodes, Regeneration Nodes and well connected sites, including in Lewisham's Opportunity Areas of New Cross/ Lewisham/Catford and Deptford Creek/ Greenwich Riverside, and carefully managing growth in these locations in response to local character;
  - b. Directing new development and investment to the Borough's strategic Area for Regeneration, and other local areas for regeneration, and coordinating the delivery of this investment to help tackle the environmental, social and economic barriers that affect the lives of people in these areas, and ensure equality of opportunity;

c. Directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vibrancy, vitality, viability and long-term resilience, and through this process:

i. Enable Lewisham Major Centre to cement its position as a centre of sub-regional significance and be designated as a Metropolitan Centre in a future review of the London Plan;

ii. Facilitate the comprehensive regeneration of Catford Major Centre to reinforce its role as the principal civic and cultural hub within the Borough; ~~and~~

iii. Ensure the District Centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their ~~distinctive character~~ distinctive character whilst evolving in their function as key hubs of community, cultural and commercial activity; ~~and~~

iv. In all other locations, small scale residential development (0.25 ha or less) in existing residential areas, will be positively considered where the site is located within PTALs 3-6 or within 800m distance of an existing railway station or town centre boundary. Such proposals will be considered in accordance with the approach towards small housing sites. Proposals involving larger windfall sites will be considered in accordance with relevant local plan policies, specifically in respect of their impact on the wider townscape character and their ability to access transport and infrastructure networks.

d. Directing new development along the A21 Corridor and other strategic Growth Corridors to support growth, along with using the Healthy Streets Approach to enhance the quality of places and improve connections within and between neighbourhoods;

e. ~~Securing the delivery~~ Enabling ~~of~~ new and improved infrastructure as a catalyst for investment and to unlock the development potential of sites across the Borough. The delivery of the Bakerloo line extension will both support and enable growth in Opportunity Areas and Lewisham's southern areas, including Bell Green and Lower Sydenham;

- f. Making the best use of land and space by prioritising the redevelopment of brownfield land of low or negligible ecological value and enabling the sensitive intensification of established residential neighbourhoods and commercial areas, including through the development of small sites;
- g. Ensuring all new development proposals follow the design-led approach to make the optimal use of land, respond positively to local distinctiveness (including the historic, cultural, natural and built environment), and helps to secure inclusive, safe, liveable, walkable and healthy neighbourhoods;
- h. Protecting, enhancing and connecting Lewisham's network of green infrastructure (including trees, parks and open spaces, water spaces and biodiversity), as well as improving the population's access to it by walking and cycling; and
- i. Ensuring that a strategic and coordinated approach is taken by the Council and its partners to respond to the climate emergency and requiring new development to integrate measures for climate change adaptation and mitigation.

## Explanation

- 3.5. This is the overarching policy for the Local Plan and is the starting point for achieving the Vision for Lewisham and responding to the plan's strategic objectives. It sets out the spatial strategy for the Borough. This is the land use and planning framework for the Council and its partners to manage growth and development, as well as to guide new investment up to 2040. The policy provides a key link between the Local Plan and the London Plan. It will help to ensure that Good Growth is delivered in a way that responds to Lewisham's distinctiveness. The Spatial Strategy seeks to achieve this objective by identifying a hierarchy of places across the Borough where good growth will be directed. This includes those places identified on Figure 3.3 as being regeneration nodes, growth nodes, strategic areas of regeneration and growth corridors.
- 3.6. The Local Plan's Spatial Strategy identifies four places as Regeneration Nodes across the Borough. These are Lewisham and Catford Major Centres, Deptford District Centre, and Bell

Green Local Centre. The Regeneration Nodes are shown on Figure 3.3 and identified under Schedule 11 Table 21.11. They are already sustainable and successful places that have the capacity to be the focus of future growth during the plan period. They already have a sustainable mix of residential, main town centre and employment uses and good public transport connections that can be future improved through the delivery of good growth. The Local Plan's Spatial Strategy, planning policies and site allocation seek to direct future good growth and investment towards these places. Their highly sustainable nature provides them with the potential capacity to facilitate the delivery of good growth at higher intensities, at specific locations where the Local Plan and its supporting evidence demonstrate that this is possible.

### **Growth Nodes**

3.7. The Spatial Strategy's good growth hierarchy continues by directing future development towards the seven Growth Nodes located across the Borough. These are Forest Hill, New Cross, and Lee Green District Centres; Bellingham, Evelyn, and Grove Park Local Centres; and Surrey Canal Strategic Industrial Location. They are shown on Figure 3.3 and identified under Schedule 11 Table 21.11 – with Lee Green District being expressed by two separate buffer zones. The Local Plan seeks to direct a proportionate level of good growth towards these location that reflects their potential capacity as defined by their character and infrastructure.

### **Opportunity Areas**

3.6-3.8. The London Plan identifies two Opportunity Areas within Lewisham. These are the New Cross/Lewisham/Catford corridor and the area at Deptford Creek/Greenwich Riverside. Opportunity Areas are “significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity”<sup>33</sup>. The London Plan requires the Local Plan to set a strategy for facilitating growth and regeneration within these areas and maximising their development potential.

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<sup>33</sup> London Plan (2021), paragraph 2.2.1.

3.7.3.9. In recent years there has been a significant amount of new development and investment within Lewisham's Opportunity Areas. A number of large brownfield sites have now been redeveloped or are expected to come forward soon, with planning consent granted and/or construction started. These new developments have already delivered, or are committed to provide, many more new homes including affordable housing, modern workspace and community facilities, along with new and improved transport infrastructure, open space and other public realm enhancements.

3.8.3.10. There remain significant opportunities for growth and regeneration within the New Cross/ Lewisham/Catford Opportunity Area. New development will be facilitated through the consolidation and intensification of underused and vacant industrial sites, the revitalisation and renewal of larger town centres, particularly Lewisham and Catford Major Centres, and the intensification of land along key movement corridors such as the A21 and A2 Growth Corridors. Growth and regeneration will be aided by the delivery of new and improved transport infrastructure, which will help to unlock the development potential of sites. This includes the arrival of the Bakerloo line extension at New Cross Gate linking to Lewisham town centre with a modernised station interchange. The rerouting of the South Circular (A205) at Catford will enable the regeneration and transformation of the Major Centre. The Council has prepared guidance documents for the Opportunity Area which have both informed the Local Plan and will support its implementation. These include the New Cross Area Framework, A21 Development Framework, Catford Town Centre Framework and the Surrey Canal Triangle SPD.

3.9.3.11. The Deptford Creek/Greenwich Riverside Opportunity Area will also be a focus for growth and regeneration, building on the area's distinctive character and strong relationship with the waterway network. New development will be facilitated mainly through the consolidation and intensification of employment sites. This will enable the delivery of new employment-led, mixed use development and transformational public realm enhancements. The scale of growth and design of development will be carefully managed in order to ensure the area's maritime and industrial heritage is preserved, enhanced and better revealed. The wider area benefits from the presence of world renowned educational and cultural institutions, which will provide a focus for community

activity with linkages to the Deptford Creekside and New Cross Cultural Quarters as well as the historic High Streets of Deptford and New Cross.

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

3.10.3.12. It is vitally important that everyone is able to enjoy a good quality of life irrespective of their background, age or ability. Whilst there are many prosperous neighbourhoods in Lewisham there are some localities where environmental, social and economic barriers adversely affect peoples' lives. Some of these localities are within the 20 per cent most deprived in the country. The Local Plan seeks to tackle deprivation by coordinating new investment within these areas. It also highlights for our stakeholders and delivery 52 partners the need for targeted interventions to address the specific causes of deprivation and inequality. This includes investment in the built and natural environment as well as programmes for education, training, health and social care. Deprivation is most prevalent in Opportunity Areas, the Strategic Area for Regeneration and Regeneration Nodes.

### **Thriving and resilient town centres**

3.11.3.13. The Local Plan seeks to ensure that Lewisham features a well-connected network of thriving and resilient town centres. The spatial strategy directs new development to town centres and their surrounds. It supports the '15-minute neighbourhood' concept, where centres provide people with most of their needs within a short walk or cycle journey from their home. This pattern of development is advocated to facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to make neighbourhoods more sustainable and ensure equality of opportunity across Lewisham.

3.12.3.14. The Borough's town centres tend to have higher Public Transport Access Levels along with a concentration of services and community facilities, making them well-placed to accommodate more people and activities. New development can support town centre vitality particularly where larger schemes deliver public realm and townscape improvements. There are also opportunities to secure the long-term viability of town centres through the introduction of a wider range of uses including housing, workspace, cultural uses and community facilities.

3.13.3.15. It is imperative that town centres complement and support but do not compete with one another. Therefore, the Local Plan seeks to build on the unique attributes, character and function of each of the Borough's town and local centres. As these centres will be key focal points for growth and new development they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and resilient places. Further details about the character and role of Lewisham's town and local centres, along with parameters for development within and around town them, are set out in Part 2 and Part 3 of the Local Plan.

## Growth Corridors

3.14.3.16. The delivery of Good Growth will require that people are enabled to live car-free lifestyles and travel mainly by walking, cycling and public transport. To make this happen Lewisham will need to be supported by an excellent public transport system along with a network of high quality walking routes and cycleways. The Local Plan identifies several Growth Corridors that extend across the Borough, including the A2/ A21 Corridor shown on Figure 3.3. The Corridors follow the existing A-road network and take advantage of the public transport opportunities that are in place along their alignments. These Corridors are identified under Schedule 11 Table 21.11. Good connections to and between town centres, parks and green spaces and residential areas are integral to liveable neighbourhoods. Also, the long-term viability of Lewisham's town centres and other employment locations will rely heavily on their capability to be accessed safely and easily by all.

3.15.3.17. The Opportunity Areas define a central growth corridor in Lewisham. This covers Deptford and extends south taking in the town centres at New Cross, Lewisham and Catford. The A21 road (Lewisham High Street, Rushey Green and Bromley Road) is the principal north-south route within this corridor. Elsewhere there are several major roads including the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon). It is acknowledged that some Growth Corridors include Conservation Areas and other heritage assets, or fall within their setting, and therefore growth will need to be carefully managed in a way that responds positively to local historic character.

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

### **Strategic Area of Regeneration**

3.19. The Local Plan continues to identify a Strategic Area of Regeneration in the South and East of the Borough. The detail approach for this Area is set out under the Lewisham East Area Policy LEA 3 Strategic Area for Regeneration, Grove Park; and Lewisham South Area Policy LSA 2 Strategic Area for Regeneration. The designated Area being shown in full on Figure 17.4. The Area seeks to deliver the Local Plan's Strategic Objectives for an open Lewisham; the delivery of new housing with a focus upon genuinely affordable homes; a thriving local economy that tackles inequalities; a greener borough; responding to the climate emergency; celebrating the Borough's local identity; delivering healthy and safe communities; and securing the timely delivery of infrastructure.

3.20. Proposals for good growth being delivered across the Strategic Area for Regeneration will tackle the inequalities and the environmental, economic, and social barriers that contribute to its deprivation and secure its sustained regeneration. This will be achieved through partnership approaches that ensure public and private sector investment is secured. The Local Plan highlights the need that investment is coordinated to successfully deliver regeneration and area improvements in collaboration with the local communities that will serve and benefit.

## Securing infrastructure to support our neighbourhoods and communities

3.16-3.21. It is imperative that everyone in Lewisham is able to share in the opportunities and benefits that growth and regeneration bring. The Council will continue to work with its key stakeholders and development industry partners to deliver the infrastructure Lewisham's neighbourhoods and communities need. This includes maintaining the valued partnerships with neighbouring boroughs. We have prepared an Infrastructure Delivery Plan (IDP) which will be used to inform planning and investment decisions. This will help us to secure infrastructure where and when it is needed. Further details are set out in Part 4 of the Local Plan.

3.17-3.22. Despite being an inner-London borough some parts of Lewisham are poorly served by public transport. This is a key factor influencing the deprivation experienced by people in the Borough. We have prepared "A Vision for Rail"<sup>34</sup> which sets out our priorities to address gaps in transport provision, and to ensure Lewisham is able to appropriately support London's growth.

3.18-3.23. The London Plan commits to extend the Bakerloo line on the Underground (tube) from Elephant and Castle to Lewisham via Old Kent Road and New Cross Gate. This would enable a potential further southward extension beyond Lewisham, although the route selection for the second phase of the BLE remains at an early stage and is subject to further development and public consultation by Transport for London. On 1st March 2021 the Secretary of State for Transport issued safeguarding Directions for the Bakerloo line extension (BLE)<sup>35</sup>.

3.19-3.24. BLE is essential to supporting London's growth, and will help to facilitate the delivery of many more new homes and jobs in the New Cross/Lewisham/Catford Opportunity Area. The potential further extension of the Bakerloo line will also support transformational investment and growth in the Bell Green and Lower Sydenham area and ensure the capacity of sites is optimised. The Council envisages a future London Plan Opportunity Area here, linked to the BLE, and we will continue to work with the Mayor of London on planning for this part of the

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<sup>34</sup> Lewisham Council - A Vision for Rail (2017)

<sup>35</sup> The Direction relates to the extension proposed to be constructed to the Bakerloo line to Lewisham via Old Kent Road and New Cross Gate. It should be referred for further information on the extent of Areas of 'Surface Interest' and 'Areas of Subsurface Interest'.

Borough. The Local Plan sets a framework to secure the delivery of the BLE and to maximise its potential in supporting Good Growth and generating new inward investment. However, as full funding for the project has not yet been secured a pragmatic approach is necessary. The spatial strategy is therefore not dependent on the BLE and can be achieved in its absence. At the same time, the Local Plan policies provide flexibility to respond to the phased delivery of the BLE over the medium to long-term.

### **Making the best the use of land and space**

3.20-3.25. Lewisham will continue to play a role in accommodating London's future growth. Whilst growth will bring many opportunities and new investment it will also lead to increasing and competing pressure on the use of land. In response to this the Local Plan sets a framework to help ensure that the best use is made of the Borough's limited supply of land. The spatial strategy directs higher density and mixed-use development to well-connected locations and other areas where new investment will support regeneration. It is complemented by the Part 2 policies which set requirements to ensure that new development is designed to a high quality standard and makes the optimal use of land. For example, by making provision for the co-location of uses or designing buildings and spaces which are adaptable to the needs of different activities and users.

3.21-3.26. The spatial strategy prioritises the redevelopment of brownfield land, or previously developed land of low or negligible ecological value. This will ensure that Lewisham's green and open spaces are protected and opportunities are taken to enhance the ecological value of brownfield sites. Part 3 of the Local Plan includes site allocation policies to ensure that the best use of land and optimal capacity of sites is realised. These are mainly located within the Opportunity Areas, Growth Nodes, Regeneration Nodes, town centres and along strategic corridors. Elsewhere, the sensitive intensification of established residential neighbourhoods and commercial areas will be supported. This will be enabled by mainly by the redevelopment of small sites.

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

3.22-3.27. The Local Plan requires all new development to be delivered through a design-led approach. This means that new development must be based on an understanding of the site context and

respond positively to the Borough's local distinctiveness. The use of the design-led approach will help to ensure that the unique and valued features of our neighbourhoods remain at the heart of the spatial strategy, and are fully considered in planning decisions.

3.23-3.28. Lewisham has been shaped by its historical development. It will continue to evolve in the context of London's growth and new technological advances. Respecting local character and accommodating growth should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough. At the same time, it should assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods.

### **A greener, more resilient borough**

3.24-3.29. The Council is committed to promoting and securing sustainable development. We have declared a climate emergency and prepared a Climate Emergency Action Plan which will work in tandem with the Local Plan<sup>36</sup>. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs<sup>37</sup>. Environmental stewardship is an integral part of this. London's natural assets are an irreplaceable resource and need to be conserved and protected. However, they are coming under increasing pressure from human activity, including that which is contributing to global climate change.

3.25-3.30. The Local Plan sets a framework for managing Good Growth with environmental considerations fully integrated into the planning and development process. It sets out our approach to protecting and enhancing the local network of green infrastructure, parks and open spaces and the water environment. As well, it provides the local land-use strategy for mitigating the Borough's impact on global climate change, whilst ensuring neighbourhoods are made more resilient and well placed to adapt to the consequences of it. Part 2 and Part 3 of the Local Plan set out further detailed requirements for new developments.

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<sup>36</sup> Lewisham's Climate Emergency Action Plan (March, 2020)

<sup>37</sup> The Bruntland Report - Resolution 42/187 of the General Assembly of the United Nations