

Integrated Impact Assessment (IIA) of the Lewisham Local Plan

Interim IIA Report

November 2020

Quality information

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Integrated Impact Assessment (IIA) in support of the emerging Lewisham Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth, identify locations for development to deliver upon the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 IIA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IIA involves undertaking the legally required Sustainability Appraisal (SA)¹ process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to health impacts and promote the reduction of health inequality.

1.2 IIA explained

- 1.2.1 It is a requirement that IIA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.2.2 In-line with the Regulations, a report (known as **the IIA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.3 More specifically, the IIA Report must answer the following **three questions** -
- What has Plan-making / IIA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the IIA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim IIA Report²

- 1.3.1 At the current time the Council is consulting on an *early* draft plan, under Regulation 18 of the Local Planning Regulations. This 'Interim' IIA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft ('proposed submission') version of the plan.

Structure of this report

- 1.3.2 Although this is an 'Interim' IIA Report and does not need to provide the information required of the IIA Report, it is nonetheless helpful to structure this report according to the three questions above.
- 1.3.3 Before answering the first question, there is a need to further set the scene by answering two initial questions:
- What is the plan seeking to achieve?
 - What is the scope of the SA?

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of IIA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an IIA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the IIA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 What's the plan seeking to achieve?

2.1 Introduction

2.1.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2 The plan area

2.2.1 Lewisham is an inner-London borough strategically located in the Thames Gateway, with connections to Canary Wharf and Central London. It has major centres at Lewisham and Catford, and two defined London Plan Opportunity Areas at the New Cross/ Lewisham/ Catford corridor and at Deptford Creek/ Greenwich Riverside. Lewisham has experienced rapid growth in both population and households over the last ten years and has a relatively young and very ethnically diverse population.

2.2.2 Many parts of Lewisham Borough have seen significant investment in recent years. This has been largely concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas.

2.2.3 However, Lewisham is within the 20% most deprived local authorities in England and is the tenth most deprived London Borough. Average life expectancy is comparable to the London average; however, in the most deprived areas, life expectancy is 6.1 years lower for males and 5.1 years lower for females. Also, children living in the Borough's most deprived areas are *twice as likely* to be obese or overweight.

2.2.4 Lewisham's diverse history has led to a range of distinct places and neighbourhoods, each with its own unique character and identity. This is reflected in the historic environment that features 28 Conservation Areas as well as Lewisham's varied and vibrant cultural scene.

2.2.5 Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Median house prices in Lewisham rose 310% between 2000 and 2017. Whilst private rental prices have remained relatively low, median rental prices increased 35% from 2010 to 2017 (against a London average of 14%).

2.2.6 Despite Lewisham's strategic inner-London location, its local economy is generally small and inward looking. Industrial and commercial activity is largely focused towards the Borough's designated employment locations and town centres. A process of plan-led industrial land consolidation has occurred in recent years to facilitate regeneration in the north of the Borough, and the current situation sees employment sites under pressure for change of use to residential, despite strong demand for workspace.

2.2.7 The Creative and Digital Industries (CDI) is an emerging growth sector, and north Lewisham is home to one of London's first Creative Enterprise Zones. The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern.

2.2.8 Lewisham is one of the greenest Boroughs in London with around one-quarter of its area being green/open space. Despite this, there are parts of the Borough that are deficient in terms of public access to open space. This is often a result of natural and constructed features, which can act as a barrier to movements.

2.2.9 Whilst carbon dioxide emissions and total energy consumption have steadily fallen across Lewisham, emissions remain an issue and the Council declared a climate emergency in February 2019. The South East London Combined Heat and Power (SELCHP) plant offers potential to support a district heat network to supply energy to homes and businesses in the north of the Borough.

2.2.10 Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer connectivity. Large parts of the Borough are covered by an Air Quality Management Area, including along main and arterial roads.

2.2.11 The emerging new London Plan (Intend to Publish version, 2019) identifies the proposed Bakerloo Line Extension (BLE) as a key strategic transport infrastructure project. The preferred route of the BLE proposes phase 1 stations at New Cross Gate and Lewisham; and a potential phase 2 of the BLE is being discussed that would run further south into the Borough. The BLE presents a key opportunity to bring major investment to the Borough.

Figure 3.1: LB Lewisham (Figure 2.1 in the plan document)



2.3 Legislative and policy context

- 2.3.1 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy, as set out in the National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015) and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- 2.3.2 The Local Plan is also being prepared in the context of the emerging London Plan, which is at an advanced stage of preparation with an Intend to Publish version having been published in 2019, subsequent to an Examination in Public and the publication of a report of recommendations from a Panel of Planning Inspectors. The latest situation is that the Secretary of State for Housing, Communities and Local Government wrote to the Mayor of London in April 2020 directing further changes to the plan.
- 2.3.3 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of: the Greater London Authority (GLA); Transport for London; the NHS Lewisham Clinical Commissioning Group; London Economic Action Partnership (LEAP); and environmental bodies including the Environment Agency, Historic England and Natural England. LB Lewisham must also cooperate with neighbouring areas, particularly the immediately adjacent south London authorities of Southwark, Greenwich and Bromley.
- 2.3.4 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans (NDPs), with NDPs in preparation for Crofton Park and Honor Oak Park, Corbett Estate, Lee (a cross-border area with LB Greenwich) and Grove Park, while a further application to designate an NDP area (Sydenham Hill) is currently being considered by the Council. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan; however, it is equally the case that made and emerging NDPs will be a consideration when preparing the Local Plan.

2.4 Plan aims and objectives

- 2.4.1 The consultation document explains that the Local Plan is being prepared in order to:
- “Respond to significant **changes to the wider planning context** – since the Lewisham Core Strategy was adopted in 2011, new national policy has been introduced, i.e. the NPPF... The London Plan has also been substantially updated and a draft new (replacement) plan has been published with significant policy changes and a new spatial development strategy...
 - Respond to the **climate emergency** – in February 2019 the Council declared a climate emergency. We recognise that a changing climate will have severe and enduring implications, and that tackling climate change is an issue of social justice as the greatest impacts will be on the most vulnerable. The new Local Plan is needed to respond to the climate emergency, with a clear framework for Lewisham to contribute to meeting the UK's new net zero carbon target.
 - Realise the **objective of an Open Lewisham** – a new plan is needed to address the emerging challenges and opportunities that our residents, businesses and visitors now face. The Local Plan will help to manage growth and coordinate investment locally, reflecting the aspirations and priorities of local communities and the Council's new Corporate Strategy 2018-2022... It comprises a single document providing a clear planning and decision-making framework, with a renewed emphasis on Lewisham's distinctive neighbourhoods and places. This will be particularly useful to community groups preparing neighbourhood plans and others who are seeking to get involved with planning locally.
 - Meet **local needs for genuinely affordable housing**, jobs and community facilities, including high quality green spaces - the Core Strategy and its supporting plans have helped the Council and its partners to deliver a significant increase in homes along with investment in town centres, new workspace and infrastructure. Most of the key strategic development sites identified in the existing plan have now either gained planning consent, been built, or are under construction. With the London Plan and NPPF setting ambitious growth targets there is a pressing need to identify additional development sites....

- Secure the delivery of the **Bakerloo Line extension** and other transport infrastructure – investment in transport infrastructure is needed to help tackle deprivation and improve health outcomes locally, as well as to accommodate and promote Good Growth. The draft London Plan now confirms a commitment to upgrade and extend the Bakerloo line (London Underground) to Lewisham. The new Local Plan is needed to help secure the delivery of the tube line extension and set a framework to maximise the local benefits it can bring.”

2.4.2 The objectives of the Local Plan are as follows:

- An Open Lewisham as part of an Open London
 - Sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham’s people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to live, learn, work and relax in Lewisham.
- Housing tailored to the community with genuinely affordable homes
 - Proactively respond to population growth and help to meet London’s housing need by positively managing the delivery of new homes across the Borough.
 - Ensure Lewisham’s existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing that is tailored to meeting the varying needs of the community, including the needs of those from all age groups at different stages of life, families and those with specialist housing requirements.
 - Foster and help to reinforce community cohesion through the provision of housing that enables individuals and households to both settle in the local area and remain rooted to it.
- A thriving local economy that tackles inequalities
 - Strengthen Lewisham’s role in the wider London economy by expanding the local business base, through steering investment to town centres and other employment hubs and supporting the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries.
 - 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.
 - Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail, business and cultural activities - with a thriving evening and night-time economy - through investment to secure Lewisham centre’s future role as a regionally important Metropolitan centre, to deliver regeneration in Catford major centre and to support the vitality of town centres elsewhere.
- A greener Borough
 - Help London to achieve National Park City status and ensure all Lewisham residents benefit from access to high quality green space, by protecting, enhancing and connecting the Borough’s network of parks, open and water spaces, including through delivery of a Green Grid to improve linkages.
 - 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.
 - 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.
- Responding to the climate emergency
 - Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes - including walking and cycling - ensuring that new development is designed to reduce car use and maximise energy efficiency, along with integrating greening measures to limit the urban heat island effect.

- Guard against the risk of flooding by ensuring that new development is appropriately located, implementing sustainable drainage systems, retaining and enhancing flood defences including through river restoration works, along with improving the water quality of the rivers Thames, Ravensbourne, Quaggy and Pool.
- Celebrating local identity
 - Retain, reinforce and help shape the distinctive character and identity of Lewisham’s communities and townscapes by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment - and is designed, constructed and maintained to a high quality standard.
 - Make the optimal use of land to facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at Deptford Creek / Greenwich Riverside and New Cross / Lewisham / Catford, and at key growth locations elsewhere, and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment including in the wider Thames-side area.
 - Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it, including by working with neighbouring authorities and other stakeholders to sustain the value of local heritage assets and their setting, along with the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
- Healthy and safe communities
 - 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.
 - Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by promoting the Healthy Streets principles, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
 - Promote cohesive and liveable communities by ensuring mixed and balanced neighbourhoods where development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
 - 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.
- Securing the timely delivery of infrastructure
 - 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.
 - Work in partnership with central government, the Greater London Authority / Transport for London, Network Rail and other stakeholders to increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through delivery of the Bakerloo Line extension.
- Ensuring high quality education, health and social care
 - 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.

What is the Plan not seeking to achieve?

- 2.4.3 There is a need to be clear that the Local Plan will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, including at the planning application stage. The scope of the Local Plan is reflected in the scope of the SA.

3 What is the scope of the IIA?

3.1 Introduction

- 3.1.1 The scope of the IIA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the IIA. **Appendix II** presents further information; however, it is not possible to define the scope of the IIA comprehensively. Rather, there is a need for the IIA scope to be flexible, responding to the emerging plan and the latest evidence base.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA Report], the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the IIA scope in 2015 (N.B. at this stage the intention was to progress an SA process, as opposed to an IIA process).
- 3.2.2 In 2019 the decision was taken to revisit the IIA scope to reflect significant changes to policy context and understanding of key issues and evidence since the time of the scoping consultation. At the current time **comments are welcomed on the IIA scope** and any comments received will be taken into account as part of future IIA work, i.e. work ahead of the Regulation 19 publication stage.

3.3 The IIA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the IIA framework established in 2019, and which builds upon the IIA framework established through dedicated scoping work, including consultation, in 2015. As discussed, comments are welcomed on the IIA framework at the current time.

Table 3.1: The IIA framework

Topic		Objective
Air quality and pollution		Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.
Biodiversity and green infrastructure		Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.
Climate change adaptation		Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.
Climate change mitigation		Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).
Communities	Accessibility	Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.
	Housing	Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.
	Wider issues	Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

Topic	Objective
Economy	Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.
Historic environment, heritage, character and culture	Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.
Land and natural resources	Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.
Transport	Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.

Integrating Equalities Impact Assessment

- 3.3.2 The Equality Act 2010 (the Act) introduced a Public Sector Equality Duty. It covers the following protected characteristics: age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race (including nationality and ethnic origin), religion or belief, sex (male/female) and sexual orientation.
- 3.3.3 Under the Duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.
- 3.3.4 Equalities issues and impacts are considered under all of the IIA framework topic headings presented within Table 3.1, and a stand-alone discussion (integrated with health considerations) is presented under the "Communities (Wider issues)" heading. A further stand-alone discussion – giving consideration to each of the protected characteristics covered by the Act – is also presented in **Appendix III**.
- 3.3.5 However, it is inherently challenging to identify a cause-effect relationship between Local Plan interventions on one hand and equalities issues on the other, given uncertainty regarding the 'on the ground' implications of strategic interventions and uncertainty in respect of how equalities issues vary spatially. In many cases there is a lack of evidence to show how groups with protected characteristic groups are geographically spread/concentrated, or to show that groups have a particular association with one or more of the types of land use being addressed through the Local Plan.
- 3.3.6 It follows that many equalities issues are more appropriately considered at the development management stage, when detailed decisions are made on matters including masterplanning and design, and evidence-gathering can be undertaken to understand the specific local issues and opportunities that exist.
- 3.3.7 One important step that can be taken through the Local Plan is to focus efforts on addressing areas and smaller pockets of relative deprivation, which can be identified using readily available data sources. This approach reflects an understanding that there is a strong link between relative deprivation and equality of opportunity for groups with protected characteristics under the Equalities Act 2010.

Integrating Health Impact Assessment

- 3.3.8 As with EqIA, health issues and impacts are discussed under all of the IIA framework topic headings presented within Table 3.1 as appropriate, and a stand-alone discussion (integrated with equalities considerations) is presented under the "Communities (Wider issues)" heading.

Habitats Regulations Assessment (HRA)

- 3.3.9 Finally, please note that a stand-alone process of Habitats Regulations Assessment (HRA) is being undertaken alongside preparation of the plan. An HRA Report is published as part of the current consultation, in addition to this Interim IIA Report.

Part 1: What has plan-making / IIA involved up to this stage?

4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: *What has plan-making / IIA involved up to this stage?*

4.2 Overview

- 4.2.1 Plan-making has been underway since 2015; however, the focus here, within Part 1, is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in 2019 and 2020. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Chapter 5**
- present an appraisal of the reasonable alternatives - see **Chapter 6**
- explain the Council's reasons for selecting the preferred option - see **Chapter 7**

- 4.2.2 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the IIA Report (N.B. this is not the IIA Report but aims to present the information required of the IIA Report).

Reasonable alternatives in relation to what?

- 4.2.3 The legal requirement is to examine reasonable alternatives taking into account the objectives of the plan,⁴ which are introduced above, within Section 2.4.
- 4.2.4 Following a review of these objectives, it was determined appropriate to focus on **spatial strategy**, i.e. the approach to allocation of sites and establishment of site-specific policy. Establishing a spatial strategy is clearly something of an overarching objective of the Local Plan, with Section 3 of the plan document dealing with "Vision, strategic objectives and spatial strategy".⁵
- 4.2.5 The decision was made to refer to the spatial strategy alternatives as **growth scenarios**.
- 4.2.6 Additionally, **Appendix IV** examines reasonable alternatives for a range of development management (DM) policy areas / issues.

Whose responsibility?

- 4.2.7 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (LB Lewisham), with AECOM acting in an advisory capacity; assessing the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.2.8 Comments are welcomed on:
- the decision to focus on growth scenarios (first-and-foremost) and select DM policy alternatives;
 - the reasonable growth scenarios selected, with reference to the selection process (Section 5);
 - assessment findings in respect of the growth scenarios (Section 6); and
 - the Council's reasons for supporting the preferred option (Section 7).

⁴ Regulation 12(2) requires that reasonable alternatives are defined in light of "the objectives and geographical scope of the plan".

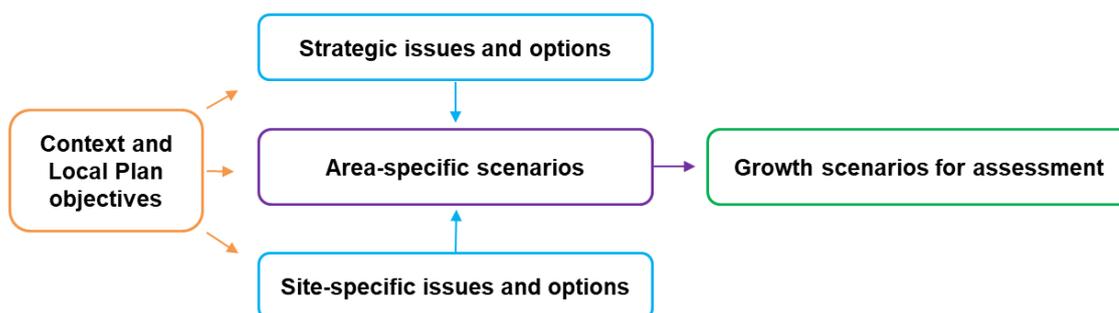
⁵ It was also considered appropriate to focus on 'spatial strategy' given the potential to define alternatives that are meaningfully different, in that they will vary in respect of 'significant effects', in terms of the IIA framework. National Planning Practice Guidance is clear that IIA "should only focus on what is needed to assess the likely significant effects of the plan". More broadly, spatial strategy has implications for all or most Local Plan objectives and, correspondingly, generates a high degree of interest.

5 Growth Scenarios Selection

5.1 Overview

- 5.1.1 The legal requirement is to explore reasonable alternatives “taking account of the objectives... of the plan”,⁶ hence there is a need to explore only growth scenarios that align with the Local Plan objectives.
- 5.1.2 From this starting point, and also from the starting point of lessons learned through the Issues consultation in 2015, the Council and AECOM went through a process of exploring strategic issues/options alongside issues/options associated with specific sites and areas within the Borough, before drawing upon this understanding to arrive at reasonable growth scenarios. Figure 5.1 summarises the process.

Figure 5.1: Selecting reasonable growth scenarios



Structure of this chapter

- 5.1.3 This section firstly covers: A) ‘top down’ analysis of strategic issues and options with a bearing on the selection of reasonable growth scenarios; and B) ‘bottom up’ analysis of the pool of sites that might feature as allocations within the reasonable growth scenarios.
- 5.1.4 The next step is then analysis of individual sub-areas within the Borough, drawing upon the preceding strategic and site-specific analysis, with the aim of reaching a conclusion, for each sub-area, on whether a single growth scenario emerges that is firmly evidenced, or there is a need to examine alternatives.
- 5.1.5 The final sub-section then draws upon the examination of sub-area scenarios to establish a single set of Borough-wide reasonable growth scenarios for assessment.

5.2 Strategic issues and options

5.2.1 The first step in the process involved the consideration of strategic issues/options in terms of:

- Quantum – how many additional new homes should the Local Plan provide for?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum⁷

5.2.2 The London Plan 2016 sets a ten year net annual target of **1,385 homes** for the Borough of Lewisham; however, the Intend to Publish London Plan (2019), which is a material consideration in planning decisions, proposes an increased ten year net annual dwelling target of **1,667 homes** (N.B. the earlier Draft London Plan, published in 2017, proposed a higher target of 2,117 homes).

⁶ N.B. the legal requirement applies to the Local Plan-making / IIA process as whole, as opposed to IIA work completed at the Regulation 18 stage of Local Plan-making. The key legal requirement is to explore reasonable alternatives ahead of finalising the Proposed Submission Plan for publication under Regulation 19 of the Local Planning Regulations.

⁷ Information taken from the Lewisham Strategic Housing Market Assessment (SHMA)

- 5.2.3 In addition to London Plan targets, there is also a need to give consideration to Local Housing Needs (LHN) following application of the Government's standard methodology, which considers demographic projections and an adjustment for affordability. This identifies an annual need figure of 3,584 homes; however, under the standard method, the need figure is capped at 40% above the average annual housing requirement figure set out in existing policies. Therefore, for Lewisham Borough, annual LHN is capped at **1,939 homes** (40% above the 1,385 target in the 2016 London Plan) or **2,334 homes** (40% above the 1,667 target in the Intend to Publish London Plan, 2019). It is also important to note that the Government recently consulted on changes to the standard method, which would involve removing the step of applying a 'cap'. Under the proposed new standard method, as published for consultation in August 2020, the annual LHN figure for LB Lewisham would be 3,735 homes.
- 5.2.4 In **conclusion**, there is a need to make provision for the Intend to Publish London Plan target as a minimum, and there are arguments for significantly exceeding the target figure, in order to 'close the gap' with LHN. Providing for LHN in full would undoubtedly be a major challenge, given limited availability of sites for redevelopment and inherent constraints to building densities/heights, which serves to indicate that providing for LHN is 'unreasonable' as an option; however, there is a need to revisit this matter below, following discussion of distribution and site-specific issues and options.

Broad distribution

- 5.2.5 This is the second of two sections examining 'strategic issues and options' with a bearing on the selection of reasonable growth scenarios. A discussion is presented under the following headings:
- Supporting opportunity areas
 - Supporting regeneration areas
 - Supporting town and district centres
 - Focusing on transport corridors
 - Delivering strategic infrastructure
 - Exploring density / building heights
 - Reflecting changing employment needs
 - Respecting and enhancing local character
 - Respecting and enhancing the local environment

Supporting opportunity areas

- 5.2.6 The London Plan identifies two Opportunity Areas within Lewisham that have significant potential to accommodate growth in homes and jobs and where neighbourhoods, businesses and residents stand to benefit from focused regeneration and urban renewal. The Opportunity Areas are: the New Cross / Lewisham / Catford corridor; and Deptford Creek / Greenwich Riverside.
- 5.2.7 In recent years there has been a significant amount of investment in these areas, and a number of strategic development sites have now been delivered or have been granted planning consent, alongside new strategic infrastructure. It follows that the potential to identify further development capacity in these areas, in order to contribute to the required step-change in housing delivery discussed above, is limited.
- 5.2.8 Finally, the Council considers that there may be an opportunity to designate a new Opportunity Area at Bell Green and Lower Sydenham. This area currently exhibits some of the highest levels of deprivation locally and suffers from low levels of public transport accessibility; however, it also features a number of large sites offering significant development potential if brought forward in a coordinated way, and supported by strategic transport and other infrastructure.

Supporting regeneration areas

- 5.2.9 It is vitally important that everyone is able to enjoy a good quality of life in Lewisham irrespective of their background, age or ability. In particular, there is a need to ensure that local residents and others are able to benefit from good access to high quality and genuinely affordable housing, education and training, and job opportunities, as well as a wide range of community facilities, such as parks and health services.

- 5.2.10 On this basis, there is a need to direct new investment to the south and southeast of the Borough, where there is widespread need for regeneration. A partnership approach must be pursued in order to ensure coordination of public and private sector investment in collaboration with local communities.
- 5.2.11 A related consideration is the need to ensure that existing dwellings are brought up to good standard, including within Lewisham's housing estates. As well as meeting housing needs, this is important from a perspective of improving living environments and ensuring integrated, safe and healthy communities.
- 5.2.12 The Decent Homes programme provides one mechanism for housing improvement and has been successfully delivered recently.⁸ However, for large scale regeneration schemes funding is limited and this type of investment may not always be feasible or viable for some houses or estates.⁹

Supporting town and district centres

- 5.2.13 There is a need to promote a vibrant and diverse multi-centred Borough by directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vitality and long-term resilience. Specifically, there is a need to:
- enable Lewisham town centre to cement its position as a centre of sub-regional significance and achieve metropolitan centre status;¹⁰
 - facilitate the comprehensive regeneration of Catford major town centre to reinforce its role as the principal civic and cultural hub within the Borough; and
 - ensure the district town centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive features whilst evolving in their function as key hubs.
- 5.2.14 These are locations that already benefit from higher levels of public transport accessibility and transport interchanges along with a core of services and community facilities. Furthermore, there are opportunities to secure the long-term viability of these centres through the introduction of a wider range of uses, including housing, workspace and community facilities, potentially alongside a reduced retail focus.
- 5.2.15 There is also a need to consider the three out-of-town retail parks at Bell Green, Bromley Road and Southend. Lewisham's Retail Capacity Study Update (2019) identifies that retail capacity can be accommodated within the town centre network, and forecasts a reduction in the need for out-of-town retail.

Focusing on transport corridors

- 5.2.16 The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor is largely centred on the **A21** (Lewisham High Street, Bromley Road).
- 5.2.17 Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary, 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).
- 5.2.18 At present these strategic roads prioritise vehicular flows, or their 'link' function, above any 'place' function, and can appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development serves to develop more of a place function, including with safe space for pedestrians and cyclists in line with Healthy Streets principles.

⁸ The proportion of residential units meeting the Decent Homes standard increased from 41% to 94% between 2007 and 2017.

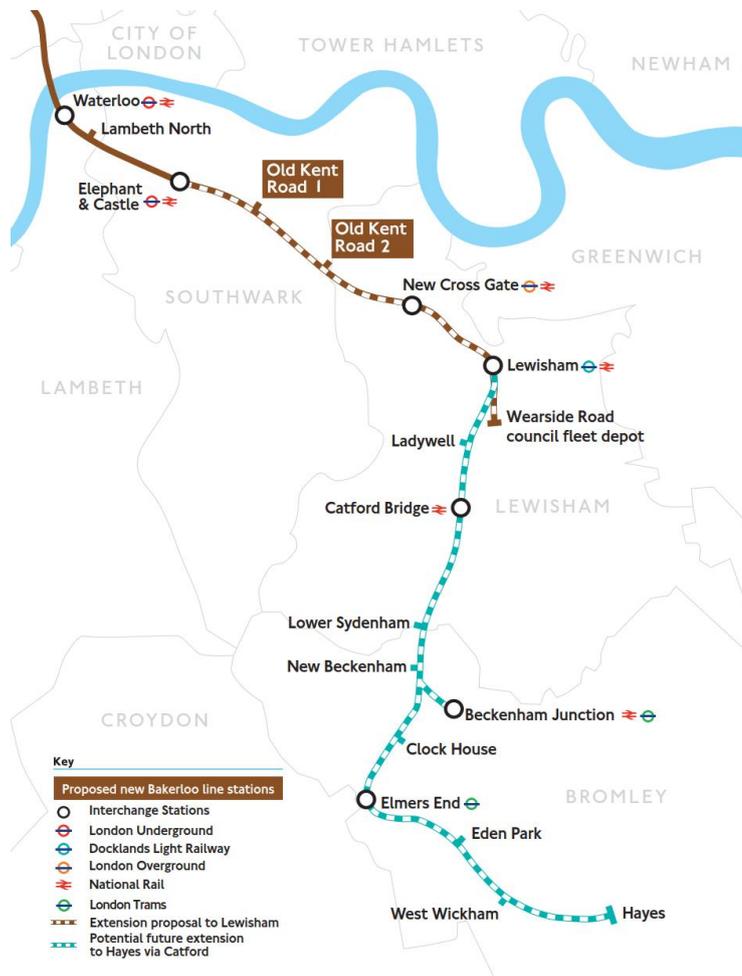
⁹ Housing estates have been developed in the Borough over many decades. Their age and condition varies and therefore so too does the programme of maintenance required for each. The layout and design of some older estates constrain opportunities for improvements, whilst other estates may be associated with options to deliver more affordable housing and improved living environments, either through incremental infill or comprehensive redevelopment. All strategic estate renewal and regeneration schemes will be carried out in consultation with existing residents and the local community, in line with the London Mayor's Good Practice Guide to Estate Regeneration (2016) and the Council's adopted Statement of Community Involvement.

¹⁰ The London Plan indicates that Lewisham major centre has the potential to be designated as a metropolitan centre in the future. This is owing to its growing influence as a transport interchange, commercial centre and community hub.

Delivering strategic infrastructure

- 5.2.19 There are strategic opportunities in respect of facilitating new and improved community and strategic transport infrastructure, particularly in the London Plan Opportunity Areas and Lewisham's southern areas, where interventions and transformational change can positively address inequalities and local deprivation.
- 5.2.20 Of key significance is the Bakerloo Line extension, which is supported by the Intend to Publish London Plan. It is proposed that the line is extended from Elephant and Castle to Lewisham via New Cross Gate. This would enable a further extension beyond Lewisham town centre, potentially bringing the Bakerloo Line to Hayes over the long-term, with stations at Ladywell, Catford Bridge and Lower Sydenham.
- 5.2.21 A Bakerloo Line Local Economic Impact Assessment has recently been completed that focuses on impacts within a one km key zone of influence, and includes a focus on the improvement that would likely be made to the Healthy Streets (HS) score in the vicinity of each of the new BLE stations (north to south):
- New Cross Gate – has a middling HS score of 51; there will be opportunities to improve this score, but significant improvement is dependent on surrounding development sites.
 - Lewisham – has a relatively high score of 60, and this could increase to 70
 - Ladywell – has a middling HS score of 51; the impact of a BLE station would be more limited, given the constrained nature of the station site, but the HS score could increase to beyond 60.
 - Catford – has a lower HS score of 49, largely due to the problematic South Circular; an upgraded Catford Bridge station could assist with increasing the score to at least 65, with an improved interchange (Catford Station and busses), better use of the river and improved connection to the Broadway and town centre.
 - Lower Sydenham – has a low HS score of 42; the Study finds that a BLE station would lead to a transformational change and a dramatic rise in the Healthy Streets score to approximately 65.

Figure 5.2: The proposed route of BLE Phases 1 and 2¹¹



¹¹ See <https://consultations.tfl.gov.uk/tube/c5ee9ab6/>

Exploring density

- 5.2.22 Making the best use of land will help to ensure a critical mass of residents and businesses to generate and support investment, such as for community facilities and public realm enhancements. This includes higher density mixed-use development in appropriate locations.
- 5.2.23 These locations are principally Lewisham's Opportunity Areas and town centres along with the strategic corridors for movement that connect these places. The Tall Buildings Study (2019) serves to inform the identification of locations considered suitable for tall buildings – see Figures 5.3 and 5.4.
- 5.2.24 A related matter is the development smaller sites throughout the Borough, including to achieve the sensitive intensification of lower density suburban areas. Such schemes - including backland sites, infill sites and extensions - will be important to meeting future housing needs, but there is limited availability and these sites are often constrained, e.g. by irregular plot forms and access issues. It is in light of these challenges that the London Plan Examination Panel Recommendations (2019) reduced Borough's the Borough's small sites target from 829 dpa (39% of the total target) to 379 dpa (23% of the total target), with this recommendation taken forward into the Intend to Publish London Plan (2019).

Reflecting changing employment needs

- 5.2.25 There is a need to explore more intensive use of employment land, and industrial land in particular, in order to meet future needs for workspace, as established by Lewisham's Employment Land Study (2019). There is also the opportunity to explore options around the co-location of complementary uses within designated industrial sites, which is a step given in-principle support by the Intend to Publish London Plan (2019). There are strong precedents for successfully achieving co-location of light industry with homes and offices, and this approach can be seen to reflect shifts in modern commercial practices (e.g. traditional office sectors can increasingly use 'hybrid' space in industrial premises); however, there can also be challenges (see discussion of reasonable alternatives in Appendix IV).
- 5.2.26 A related priority is to address the shortage of low-cost and affordable workspace, which is identified as a significant issue by Lewisham's Employment Land Study (2019) and Local Economic Assessment (2019). In Lewisham it has a key local role in supporting the cultural, creative and digital industries. Low-cost workspace has typically been scattered across town centres and areas such as New Cross and Deptford, and clusters are also present along the East London Line (Overground) corridor.

Respecting and enhancing local character

- 5.2.27 Lewisham comprises many neighbourhoods and places, all of which have distinctive features. The historic, cultural, natural and built environment contributes significantly to shaping local character. It also influences how people experience the Borough and informs their sense of place and identity. There is, therefore, a need to support integrated place making, which necessitates development delivered through a design-led process based on an understanding of site context. A Characterisation Study (2019) has been prepared in collaboration with the local community and sets out key defining features of the Borough.
- 5.2.28 A related consideration is the portfolio of strategic views in the Borough, including London Strategic Views and Lewisham Local Views, which help to define the character of London and contribute to local distinctiveness. These strategic views, including their Protected Vistas, must be designated and positively managed in line with the London Plan and associated London View Management Framework.
- 5.2.29 A further related consideration is the recent clustering of Houses in Multiple Occupation (HMOs) in Lewisham's southern wards, which has led the Council to implement an Article 4 Direction to remove the Permitted Development rights for the conversion of dwellings into small HMOs within certain wards. There are wide-ranging issues associated with HMOs, including in respect of meeting housing needs; however, a stand-out concern relates to impacts to local character and amenity, e.g. due to parking and bins.

Respecting and enhancing the local environment

- 5.2.30 There is a need to protect and enhance the local network of green infrastructure, open spaces, the water environment and biodiversity, noting that Lewisham is strongly associated with the valley of the River Ravensbourne (also its tributaries the Quaggy and Pool). A value figure of £2.1 billion has recently been assigned to Lewisham's green infrastructure (Open Spaces Assessment, 2019), which helps to put into perspective the importance of protection and enhancement, and further context is provided by the draft London Plan objective to make London 50% green by 2050, in line with London's National Park City status.

- 5.2.31 Open spaces form a vital component of Lewisham’s green infrastructure. Lewisham benefits from a wide range of good quality open spaces, which total around one-fifth of the area of the Borough; however, as the Borough’s population increases the pressure on open spaces will rise. The Lewisham Open Spaces Assessment (2019) finds that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term; however, there will be limited opportunities to create new open space. It is therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced.
- 5.2.32 Also, and importantly, the spatial strategy must serve to minimise per capita greenhouse gas emissions and ensure the Borough is resilient to the consequences of climate change. There is a need to support modal shift away from use of the private car, in light of the London Plan target for 80% of all journeys in London to be made by non-car modes by 2041, including by supporting a more compact urban structure with a well-linked network of places and finer grained integration of land uses. Delivering economies of scale and the conglomeration of uses necessary to enable heat networks is another clear opportunity.
- 5.2.33 In respect of access to public transport, this varies across the Borough, with New Cross, Deptford, Lewisham and Catford generally well served, including by stations with frequent services on the Docklands Light Railway (DLR), National Rail and London Overground networks; however, other parts of the Borough do not benefit from the same level of provision and connectivity. Furthermore, bus and rail orbital routes are somewhat limited, making radial movements typically faster than orbital trips. The main orbital road links, such as the South Circular Road, contribute to orbital trips being more attractive by car. Lewisham’s southern areas currently have the highest levels of dependency on car use.
- 5.2.34 Finally, there is a need to consider the six designated air quality management areas (AQMAs), which cover all of the Borough north of the A205 (South Circular) together with major roads in the south. In addition to AQMAs, there are also ten air quality focus areas (AQFAs) in the Borough.

Conclusion on broad distribution issues and options

- 5.2.35 The discussion above has served to highlight a wide range of broad distribution issues and options that must feed into work to establish reasonable growth scenarios. A wide range of mapped information is presented within the Draft Local Plan consultation document to support the discussion above, but for the purposes of this report there is a particular need to present two key maps dealing with tall buildings, namely A) variation in tall buildings sensitivity; and B) variation in overall tall buildings suitability.

Figure 5.3: Tall buildings sensitivity

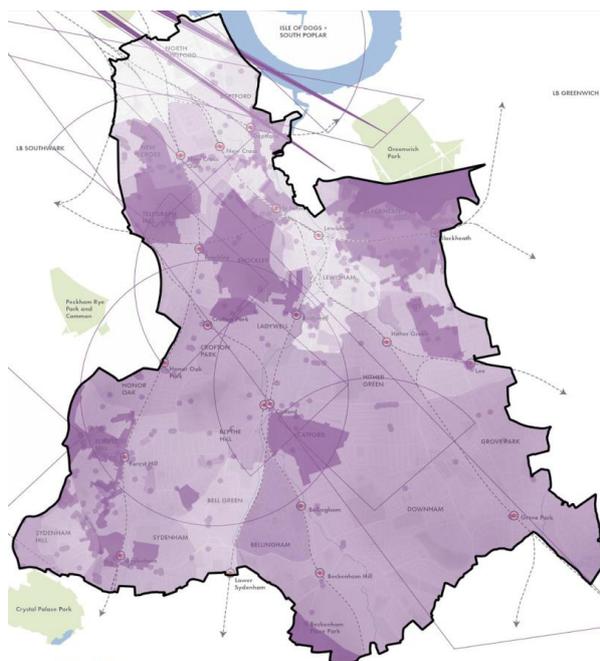
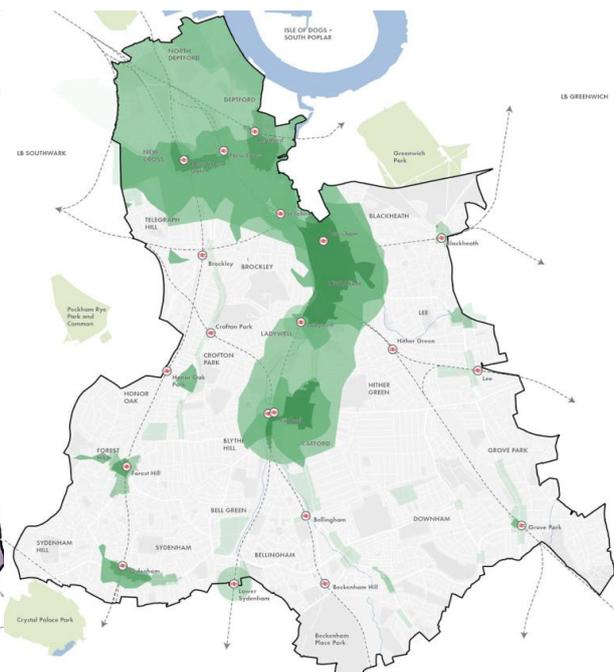


Figure 5.4: Tall buildings suitability



5.3 Site specific issues and options

5.3.1 Having considered strategic (or 'top down') issues and options with a bearing on the establishment of reasonable growth scenarios, the next step was to explore site specific ('bottom up') options, i.e. options in respect of the pool of sites that are available and potentially in contention for allocation.

5.3.2 Specifically, this section considers:

- Sifting site options leading to the identification of sites for allocation;
- exploring density options at specific sites (or types of site); and
- exploring use mix options at specific sites (or types of site).

N.B. the discussion below is a summary of analysis completed by the Council, with no stand-alone work having been completed through the IIA process. This is considered a proportionate and appropriate approach in the Lewisham context; however, comments are welcome on the approach taken.

Identifying sites for allocation

5.3.3 An initial list of site options was identified from various sources, including:

- the London Strategic Housing Land Availability Assessment (SHLAA) – this exercise, led by the GLA, identified potential development sites across London (and informed the Borough's housing target);
- Lewisham Borough 'Call for Sites' – two Call for Sites consultations were undertaken inviting the public (including landowners and developers) to submit sites for consideration in the new Local Plan;
- existing site allocations – these consist of sites which are included in the adopted Local Plan but have not been fully delivered;
- development pipeline – a number of consented major schemes have been identified that require an allocation, including because there is the potential to revisit / adjust the approach to development, and also to provide certainty over the future use of land;
- pre-application sites – these are sites at the advanced stage in the pre-application process, to the extent that they can be considered part of the 'development pipeline'; and
- other sites – identified by the planning policy team through the technical evidence base, site investigations and in liaison with internal and external stakeholders.

5.3.4 All identified site options were then subject to a sifting exercise, as part of which officers assessed sites against criteria to establish whether they were suitable for allocation – see Table 5.1

5.3.5 In total, 81 of the pool of 378 sites were identified as suitable for allocation by the Council following application of this criteria-based methodology. Detailed reasons for progressing / excluding sites are presented within the Council's Site Allocations Background Paper; Table 5.2 presents a summary; Box 5.1 presents further information on reasons for excluding sites.

5.3.6 Ultimately, the Council and AECOM determined that the collection of 81 sites identified as suitable for allocation on the basis of the site selection criteria could reasonably be **held-constant** across the reasonable growth scenarios, i.e. there was not a need to explore growth scenarios involving non-allocation of one or more of the 81 supported sites, nor growth scenarios explicitly involving allocation of one or more of the 297 excluded / omission sites.

Table 5.1: Site sifting criteria applied by the Council

Criteria	Details
Existing site allocation or consented scheme	Existing site allocations, or consented schemes, where development has been fully delivered, or those which have planning consent and are expected to be delivered by the start of the new Local Plan period (i.e. 2020), were excluded.
Site size	Sites less than 0.25 hectares in size are not considered strategic in scale and were therefore excluded. However, limited exceptions were made for small sites where there were good planning reasons for allocating them (e.g. their development could make a positive contribution to the locality).
Open space	Sites on protected open space are not considered appropriate for development and were therefore excluded. However, limited exceptions were made where the site was demonstrably necessary to facilitate the delivery of strategic infrastructure (e.g. release of small portion of MOL at Catford to enable the re-alignment of the South Circular).
Biodiversity	Sites on protected nature conservation sites are not considered appropriate for development and were therefore excluded.
Social housing estates	Social housing estates were excluded. This is owing to the requirement for residents' ballots on regeneration and renewal schemes, and the resultant uncertainty regarding deliverability of the site allocation. Exceptions were made for sites where there is an extant planning consent for estate regeneration, or future site regeneration has been supported in-principle through a formal ballot.
Other housing	Sites with HMOs were excluded in line with the London SHLAA methodology. Sites with gypsy and traveller provision were excluded.
Employment land	Designated employment sites were excluded. However, limited exceptions were made for sites identified in the Employment Land Study Update (2019) as suitable for alternative uses (on the provision of no net loss of industrial capacity).
Community infrastructure	Sites containing strategic community infrastructure (such as education and health care facilities) were excluded. However, limited exceptions were made for sites which landowners considered suitable for inclusion as part of the management of the public sector estate, with clear mechanisms or proposals for future delivery. ¹²
Cultural asset	Site containing strategic cultural institutions were excluded (e.g. Horniman Museum and Gardens).
Heritage assets	Sites containing heritage assets were excluded where these would pose a significant constraint to redevelopment.
Strategic infrastructure	Sites were included, or land use designations proposed, where land is required to be safeguarded to facilitate the delivery of strategic infrastructure (transport, waste management, utilities, flood defences). This is particularly for transport infrastructure associated with the Bakerloo Line extension and station interchanges.
Public safety	Sites including public safety infrastructure and services (such as fire stations) were excluded.
Spatial strategy	Sites were included where they were considered integral to the delivery of the spatial strategy for the Borough, having regard also to the strategic direction of the London Plan.
Deliverable and developable	Sites were excluded where they were not considered to be deliverable and developable, having regard to the definitions in the NPPF. ¹³ Considerations were informed by landowner/agent interest in the site, taking into account pre-application discussions, feedback from the 'call for sites' and the Council's early landowner engagement exercise.

¹² Where site allocations include community infrastructure, future development proposals will be required to safeguard and/or enhance this infrastructure, in line with the draft Local Plan policies.

¹³ Deliverable and developable as defined by the NPPF (2019), Glossary.

Table 5.2: Summary of the site selection process

Status	Reason	SHLAA sites	Call for sites	Other sites	Total sites
Sites proposed for allocation	Has planning permission	12	-	-	12
	Existing allocation	16	-	-	16
	SHLAA 'potential development site'	18	-	-	18
	SHLAA 'low probability site'	11	-	-	11
	Not supported by SHLAA, but now found to be suitable for housing	9	-	-	9
	Not considered by the SHLAA	-	3	12	15
Total sites proposed for allocation		66	3	12	81
Excluded sites (more clear-cut)	Fully delivered	52	-	-	52
	Expected to be delivered in 2020	5	1	-	6
	Not strategic in scale	1	18	-	19
	Deliverability issues	8	1	2	11
	Strategic infrastructure	10	8	-	18
Excluded sites (less clear-cut)	Community infrastructure (health, education, community facilities)	90	3	-	93
	Open space and/or biodiversity	15	9	-	24
	Safeguarded employment land	22	2	-	24
	Heritage assets	23	1	-	24
	Social housing estate	13	2	-	15
	Public safety	1	3	-	4
	Other housing	4	-	-	4
	Cultural institutions	3	-	-	3
Total excluded sites		247	48	2	297
Total sites		313	51	14	378

Box 5.1: Further detail on reasons for excluding sites

As discussed, the Council completed a criteria-based site selection process that led to the identification of 81 sites as suitable for allocation and, conversely, 297 sites excluded as not suitable for allocation.

106 sites were excluded for relatively clear-cut reasons.

The following bullet points explore less clear cut reasons for excluding sites:

- Community infrastructure – the GLA London SHLAA identified a wide range of sites comprising existing community infrastructure. The SHLAA identified a large number of sites as unsuitable for housing or having low probability of delivering housing in the plan period. These sites are relatively straightforward to dismiss as unsuitable for allocation in the Local Plan. However, the SHLAA also identified three community infrastructure sites as potentially suitable for housing - namely Lewisham Hospital; South Lewisham Health Centre; and Honor Oak Community Centre – which the Council does not propose to allocate. The Council identified these sites as unsuitable taking account of the potential for effective re-provision of the community infrastructure (and noting that DM policies will be included in the plan that allow flexibility for windfall development options to be considered on a case by case basis).
- Safeguarded employment land – the Employment Land Study (2019) explored all existing designated employment sites in the Borough with a view to identifying those that might potentially be suitable for allocation in order to facilitate enabling mixed-use development (i.e. employment plus residential), to include new modern workspace and an overall ‘no net loss’ of employment floorspace. The study applies a range of criteria, including relating to walking, cycling and public transport accessibility, with a view to identifying sites more/less suited to mixed use redevelopment. The conclusion reached was that ten sites, totalling 11.3ha (out of a total employment land resource of 78.1 ha) are potentially suitable for mixed use development.
- Social housing estates – a total of 15 identified sites currently comprising all or part of a social housing estate were ruled out as unsuitable for allocation. The majority of these were identified by the SHLAA as having low probability of delivering housing in the plan period; however, the SHLAA did identify two sites in Lewisham as having ‘potential to deliver housing’. The Council has considered these sites closely, but does not consider that it is suitable for allocation in the plan period given the requirement for a ballot on regeneration schemes and uncertainty over site deliverability.
- Heritage – 23 sites were ruled-out by the SHLAA (i.e. identified as unsuitable for housing), which serves as an indication that the reasons were quite clear cut. One additional site that came forward through the Lewisham Call for Sites (Master Shipwrights House) was additionally ruled-out. This is a grade II* listed building.
- Flood risk – no sites have been ruled out as unsuitable on flood risk grounds; however, the decision was made to change the proposed use at one of the proposed allocations - Molesworth Street Car Park – from mixed use to employment to reflect the flood risk constraint.



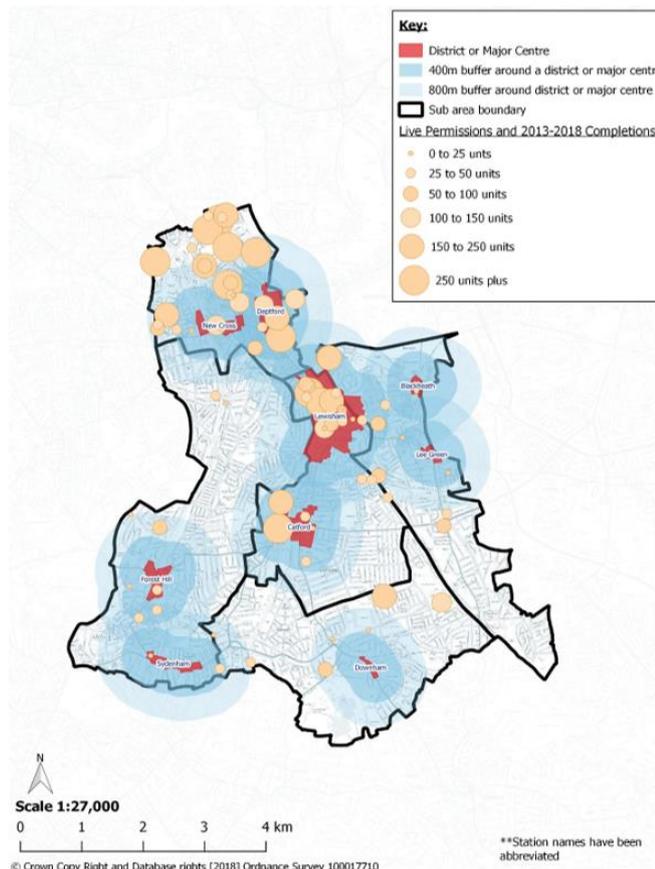
Modern units at Bromley Road SIL, which is the only SIL outside of Deptford/New Cross and identified as requiring safeguarding for employment uses by the Employment Land Study (2019)

Exploring site capacity options

5.3.7 A standard methodology exists for calculating site capacity; however, this is only a starting point. Specifically, there is a standard methodology based on the London-wide Strategic Housing Land Availability Assessment (SHLAA) methodology used to inform the draft London Plan. It involves consideration of: size of the site (site area); character setting of the site (e.g. suburban, urban, highly urban); GLA assumptions on density in these character typologies; Public Transport Accessibility Levels (PTAL); mix of land uses; and existing housing units and non-residential floorspace.

5.3.8 Following application of the standard methodology there is also a need for a sense-check exercise involving considering the indicative densities against actual densities recently achieved locally, as set out in the Council’s local plan Development Density Background Paper (2020) – see Figure 5.5.

Figure 5.5: Density of recent completions and permissions



5.3.9 Where the standard method derived figure is called into question then the next step is to explore density in detail through a sensitivity analysis process. This involves taking detailed account of site sensitivities, including in respect of heritage assets and open spaces, and also giving consideration whether the site must contribute to the transition between two character areas, e.g. sites at the edge of a town or local centre.

5.3.10 In practice the sensitivity process involves a downward adjustment to the character setting of a site (e.g. from central to urban), with a commensurate downward adjustment to the indicative development density that emerges from the standard methodology.

5.3.11 Finally, it is important to note that detailed site specific information is available through:

- Planning consents - the agreed density for consented sites should be reflected in the Local Plan unless it is the case that there is an advanced pre-application discussion for a revised scheme.
- Pre-application discussions - where reliable information on capacity is available following pre-application discussions then it is appropriate to take this information into account.
- Masterplans – account can be taken of design-led site capacity work set out within the emerging Catford Town Centre Masterplan and the New Cross Area Framework and Station Opportunity Study .
- Bell Green / Lower Sydenham area – initial work has been undertaken to explore the possibility of delivering redevelopment at higher densities under a BLE Phase 2 scenario, in line with the Council’s stated ambition to attain London Plan Opportunity Area status for this area. Further detailed work on a masterplan for the area is due to be undertaken, which may help to inform indicative site capacities as the plan is progressed.

5.3.12 Table 5.3 presents the route taken to arriving at an indicative density for all proposed allocations.

5.3.13 Ultimately, the Council and AECOM determined that, whilst for the great majority of sites the density figure that emerges following application of the methodology discussed above is robust, there is the potential to explore **higher density options** at certain sites through the appraisal of reasonable growth scenarios. As such, the matter of development density is considered further below, within Section 5.4.

Table 5.3: Identifying those sites associated with a potential choice in respect of density

Sub-area	Site name	Consent or pre-app	Standard method?	Masterplan	Sensitivity process?
Central Area	Lewisham Gateway	Yes			
	Lewisham Shopping Centre		Yes		
	Land at Engate Street				Yes
	Conington Road	Yes			
	Land at Conington Road and Lewisham Road (Tesco)				Yes
	Molesworth Street Car Park		Yes		
	Lewisham Retail Park, Loampit Vale	Yes			
	Land at Loampit Vale and Thurston Road (Carpet Right)	Yes			
	Silver Road and Axion House	Yes			
	PLACE/Ladywell (Former Ladywell Leisure Centre)				Yes
	Ladywell Play Tower	Yes			
	Driving Test Centre, Nightingale Grove		Yes		
	Land at Nightingale Grove and Maythorne Cottages		Yes		
	Church Grove Self-Build	Yes			
	Land to the Rear of Chiddingstone House	Yes			
	110-114 Loampit Vale		Yes		
	Ravensbourne Retail Park				Yes
	Catford Shopping Centre and Milford Towers			Yes	
	Plassy Road Island			Yes	
	Laurence House and Civic Centre			Yes	
Wickes and Halfords, Catford Road			Yes		
Land at Rushey Green and Bradgate Road (Aldi)				Yes	
House on the Hill, Slaithwaite Road				Yes	
Land at Randlesdown Road and Bromley Road			Yes		
North Area	Convoys Wharf MEL	Yes			
	Timber Yard, Deptford Wharves at Oxestalls Road MEL	Yes			
	Riverside Youth Club and 2000 Community Centre		Yes		
	Evelyn Court at Surrey Canal SIL		Yes		
	Neptune Wharf MEL	Yes			
	SIL at Surrey Canal Road and Trundleys Road	Yes			
	SIL at Apollo Business Centre		Yes		
	New Bermondsey/ Surrey Canal Triangle MEL	Yes			
	Former Hatcham Works, New Cross Road				Yes
	Goodwood Road and New Cross Road				Yes
	Former Deptford Green School (Upper School Site)	Yes			
	Albany Theatre				Yes
	North of Reginald Rd and South of Frankham St (Tidemill School)	Yes			
	Sun Wharf MEL	Yes			
	Creekside Village East, Thanet Wharf MEL	Yes			
	Lower Creekside LSIS				Yes
	New Cross Gate NDC Scheme, Besson Street	Yes			
Achilles Street	Yes				

Sub-area	Site name	Consent or pre-app	Standard method?	Masterplan	Sensitivity process?
East Area	Heathside and Lethbridge Estate	Yes			
	Blackheath Hill LSIS		Yes		
	Leegate Shopping Centre	Yes			
	Sainsbury's Lee Green		Yes		
	Land at Lee High Road and Lee Road		Yes		
	Southbrook Mews		Yes		
	Travis Perkins and Citroen Garage		Yes		
	Mayfields Hostel, Burnt Ash Road	Yes			
	Sainsbury Local and West of Grove Park Station		Yes		
South Area	Former Bell Green Gas Holders		Yes		
	Bell Green Retail Park		Yes		
	Sainsbury's Bell Green		Yes		
	Stanton Square LSIS		Yes		
	Sydenham Green Group Practice		Yes		
	Worsley Bridge Road LSIS		Yes		
	Lidl, Southend lane		Yes		
	Excalibur Estate	Yes			
	Bestway Cash and Carry		Yes		
	Homebase / Argos, Bromley Road		Yes		
	Downham Co-op		Yes		
	Beadles Garage		Yes		
	McDonalds Ashgrove Road		Yes		
	Catford Police Station		Yes		
Land at Pool Court	Yes				
West Area	111 - 115 Endwell Road		Yes		
	6 Mantle Rd		Yes		
	Jenner Health Centre		Yes		
	Havelock House, Telecom Site and Willow Tree House, Nr Horniman Dr				Yes
	Land at Forest Hill Station West (Devonshire and Dartmouth Roads)		Yes		
	Clyde Vale LSIS		Yes		
	Featherstone Lodge, Eliot Bank	Yes			
	Former Sydenham Police Station	Yes			
	Willow Way LSIS		Yes		
	Land at Forest Hill Station East (Waldram Place and Perry Vale)		Yes		
	Perry Vale LSIS		Yes		
	Land at Sydenham Road and Loxley Close		Yes		
	113 to 157 Sydenham Road		Yes		
154 to 158 Sydenham Road		Yes			
74-78 Sydenham Road		Yes			

* with regards to the six sites within the South Area highlighted with **bold text**, at the current time it is necessary to assume densities at these sites in accordance with the standard method; however, as discussed, the Council has undertaken initial work to understand the potential to achieve higher densities under a BLE Phase 2 scenario.

Exploring use mix options

- 5.3.14 The final 'bottom-up' input to the process of selecting reasonable growth scenarios involved exploring the mix of uses to be delivered by specific sites / types of site.
- 5.3.15 For sites where the SHLAA methodology was used to establish an indicative capacity (see Table 5.3), in general, the mix of uses was set using the following broad assumptions:
- **Sites requiring re-provision** of commercial uses/floorspace (namely sites comprising SIL/LSIS or non-designated employment land), or either retail or community uses (where the existing use is high value), should be redeveloped such that the use being re-provided comprises 1/3 of the total floorspace.
 - **Other sites for mixed use development:**
 - Lewisham town centre core (Lewisham shopping centre and immediate surrounds) should comprise 60% residential, 30% town centre and 10% commercial uses, by floorspace;
 - in major, district and local centres should comprise 75% residential, 15% town centre and 10% commercial uses, by floorspace;
 - in the Bell Green / Lower Sydenham masterplan area should comprise 70% residential, 20% town centre and 10% commercial uses, by floorspace; and
 - elsewhere should comprise 85% residential, 10% town centre and 5% commercial uses, by floorspace.
- 5.3.16 In some circumstances, and in particular with larger sites, the Council determined a need to adjust the use mix to reflect site-specific factors, for example the need for protection or provision of significant new public open space or public realm enhancements.
- 5.3.17 Ultimately, the conclusion was reached that the matter of use mix could reasonably be **held-constant** across the reasonable growth scenarios, i.e. need not be considered further as a potential variable (as per the matter of site selection, but unlike the matter of development density).



A recent mixed use development in Lewisham

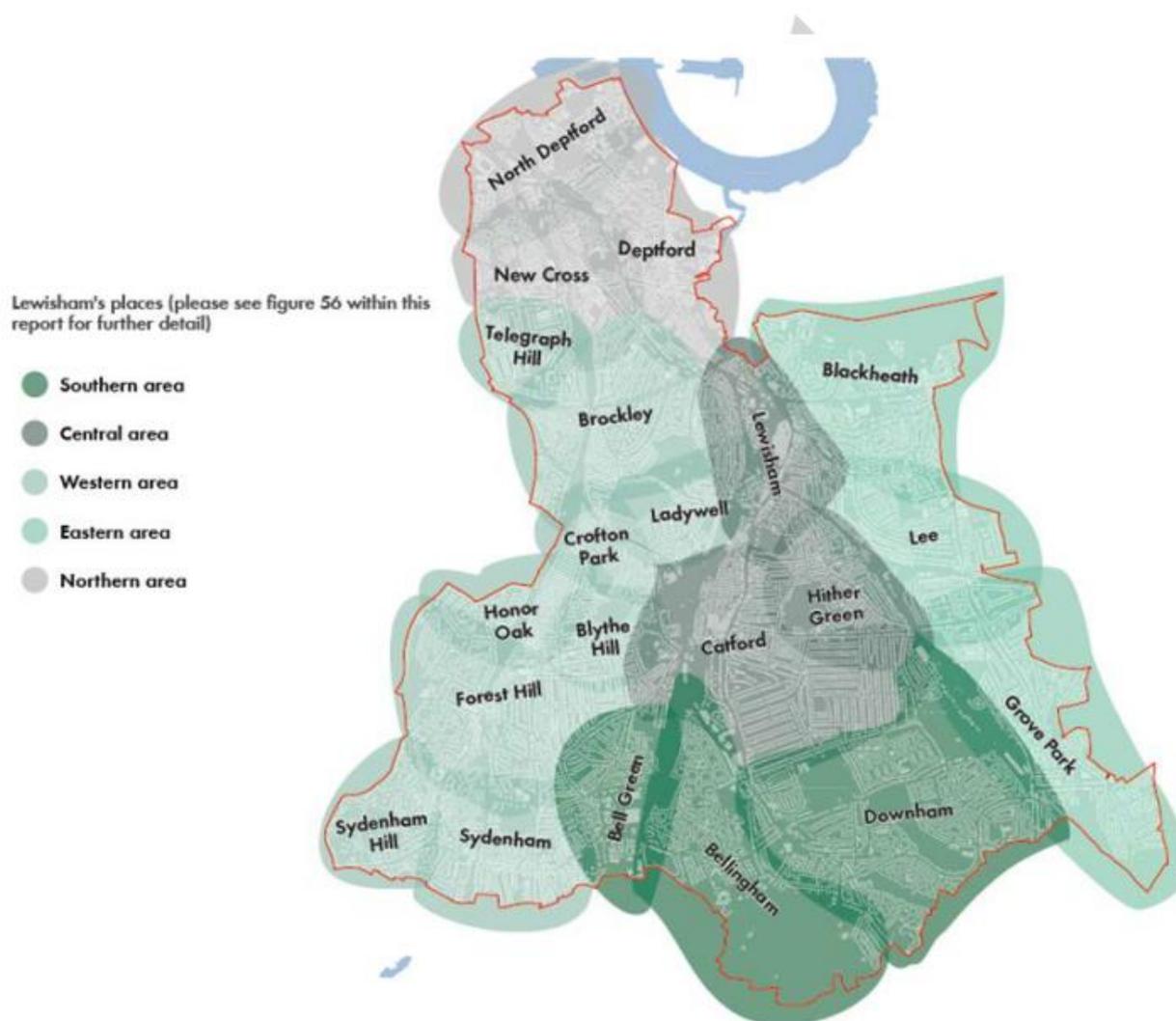
5.4 Sub area issues and options

5.4.1 The third step in the process of arriving at reasonable growth scenarios involved exploring issues and options at each of the Borough's five defined sub-areas in turn (see Figure 5.6), drawing upon the 'top-down' and 'bottom-up' analysis presented within Sections 5.2 and 5.3 above, and ultimately reaching a conclusion on whether the approach to development:

- can reasonably be held **constant** across the reasonable growth scenarios; or
- needs to be a **variable** and, if so, what the **alternatives** are.

5.4.2 The five sub-areas are discussed in turn below.

Figure 5.6: Map of the five defined sub-areas¹⁴



¹⁴ Sourced from the Draft Parks and Open Spaces Strategy, 2020

Central sub-area

- 5.4.3 Lewisham's Central Area contains the neighbourhoods of Lewisham, Hither Green and Catford. It has a strong relationship with the Ravensbourne, Pool, and Quaggy rivers and their river valley corridors. The housing character is generally varied as a result of post-WWII patterns of development, with conservation areas and listed buildings within and adjacent to the area.

Lewisham

- 5.4.4 Within Lewisham many sites have recently been redeveloped with high quality designs; however much of the town centre remains fragmented and disconnected as a result of larger sites and blocks, with areas of poorer quality public realm including the pedestrian and cycle environment, particularly on Lewisham High Street. Many of the older sites have a poor quality retail and leisure offer.
- 5.4.5 Three proposed allocations require a sensitivity-led approach to setting indicative density; however it is difficult to identify reasons for exploring an approach to density that differs significantly from that which emerges following application of the Council's methodology. Lewisham is relatively well suited to tall buildings, but this is accounted for by the methodology.
- 5.4.6 The BLE would further enhance the PTAL and could lead to some additional development opportunity, but any uplift in homes delivered due to the BLE would be modest. It is fair to assume an **uplift of c.10%**.

Catford

- 5.4.7 Catford comprises the civic hub of the Borough with a key focal point at the historic Broadway Theatre. Many key sites have recently been redeveloped to a high design standard; however, the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, has led to high levels of severance and poor permeability and legibility. Redevelopment opportunities exist alongside planned strategic transport investment that will allow the area to be 'reimagined'.
- 5.4.8 Four of the proposed allocations fall within the area covered by the emerging Town Centre Masterplan, through which preferred indicative densities have been established, and the fifth site to the north of the town centre is a transition site that warrants a sensitivity-led process to assigning an indicative density. 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; however, there is the option of supporting higher densities, and creating a tall buildings cluster at Catford. The specifics would need to be explored through the Catford Town Centre Masterplan, but there might be potential for a homes **uplift of c.20%**.

A21 corridor (Lewisham to Catford)

- 5.4.9 The A21 corridor is currently dominated by traffic with a poor quality public realm and pedestrian and cycle environment. The High Street is generally not well connected with surrounding neighbourhoods and is dominated by larger sites and blocks leading to irregular east-west connections. Whilst the character of the corridor is well established around Lewisham Hospital (with opportunities to 'reinforce' the existing character), opportunities exist for intensification along the majority of the corridor.
- 5.4.10 One of the proposed sites requires a sensitivity-led approach to setting development density; however, it is difficult to identify reasons for exploring an approach to density that differs significantly from that which emerges following application of the Council's methodology. BLE Phase 2 would enhance the PTAL and could lead to some additional development opportunity, but any uplift in homes delivered would be modest. It is fair to assume an **uplift of c.10%**.

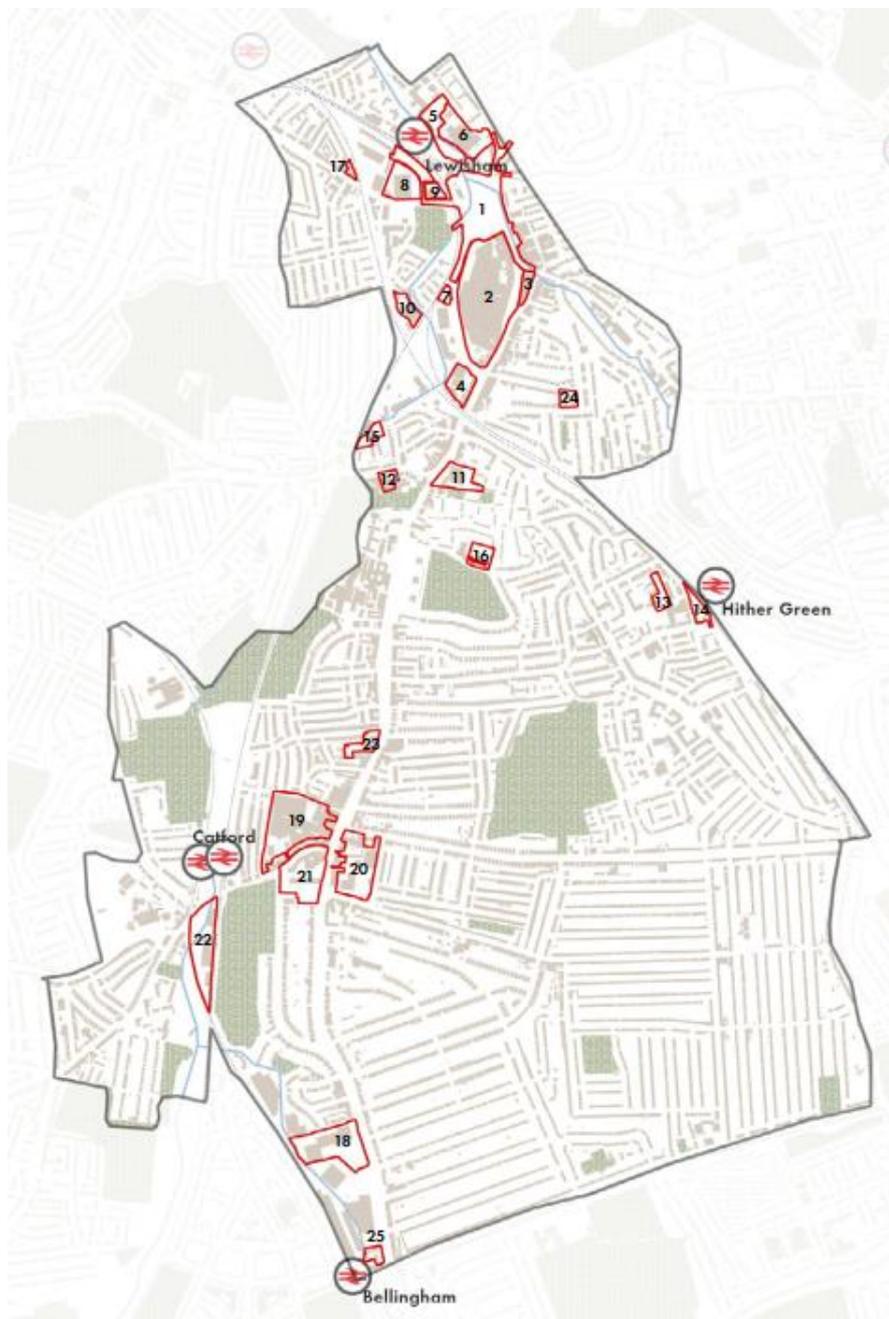
Hither Green

- 5.4.11 Hither Green is characterised by predominantly smaller scale historic residential areas. There is a poor sense of arrival to the immediate west of the train station with limited links across the railway. Opportunities exist for sensitive infill and high quality small sites development to 'reinforce' local character.
- 5.4.12 Neither of the sites require a design-led approach to setting development density, and it is difficult to identify reasons for exploring an approach to density that differs significantly from that which emerges following application of the Council's methodology.

Conclusion

5.4.13 In conclusion there is a need to explore the approach to growth at Lewisham, Catford and the intervening A21 corridor as a variable across the reasonable spatial strategy growth scenarios. Specifically, there is a reasonable need to explore both the approach to density that emerges following application of the Council's preferred methodology and the **density uplift options** identified above.

Figure 5.7: Proposed Central area allocations



North sub-area

- 5.4.14 Lewisham's North area contains the neighbourhoods of North Deptford, Deptford, and New Cross. The waterway network helps to define the area, particularly the River Thames that establishes its northern boundary. The River Ravensbourne and Deptford Creek, the latter forming the boundary with Royal Borough of Greenwich, are also prominent physical features and contribute to a Thames-side character.
- 5.4.15 This area has a rich and varied historic environment with a number of conservation areas. Historic buildings and structures include churches, Georgian townhouses, Victorian terraces, industrial warehouses and railway viaducts. Local character is also strongly influenced by the historic dockyard and maritime industries. The area was heavily damaged in WWII and redevelopment through the subsequent interwar and postwar periods has given rise to a mixed urban character, with a number of large estates featuring large plots and mid-rise, medium density housing, including the Pepys Estate.
- 5.4.16 The character of this area is also strongly informed by the layout of historic roads and railway infrastructure that dissect much of the area. However these main routes are dominated by vehicular traffic and typically suffer from poor quality public realm, limiting their suitability for pedestrians and cyclists.
- 5.4.17 This area contains much of the Borough's employment land stock, giving it a distinctive industrial character. There are designated and non-designated employment sites situated throughout, including the Strategic Industrial Location (SIL) at Surrey Canal Triangle and clusters of locally significant sites around Deptford Creekside. Several larger industrial sites have recently undergone a plan-led process of regeneration, with mixed-use residential and employment schemes introduced. Renewal of older employment sites is an important component of the area's evolving character.
- 5.4.18 Recent changes to the local economy have also seen the area emerge as one of London's leading centres for the creative and digital industries, gaining recognition from the London Mayor as a Creative Enterprise Zone. The Council is committed to working in partnership with world class institutions such as Goldsmiths, Lewisham College, the Albany and Laban Centre, which are at the heart of this success.
- 5.4.19 The historic high streets at Deptford and New Cross offer provision of a rich and vibrant mix of shops, services and independent traders. Deptford market, situated at the heart of Deptford district centre, is a focal point for community activity and a well-known visitor destination. The town centres benefit from their proximity to important cultural and educational institutions.
- 5.4.20 The network of green infrastructure in this area, including parks and open spaces, are valuable natural and recreational assets within the predominantly urban context. Many newer developments have delivered public realm improvements, opening up access to and naturalising parts of Deptford Creek and the River Ravensbourne, as well as providing improved access to the River Thames. Many neighbourhoods however have a limited number of street trees and could benefit from urban greening.
- 5.4.21 The majority of sites are consented or at an advanced stage of pre-application discussion, including four of the five stand-out large sites (above c.500 homes). Of the seven remaining sites two are the focus of a masterplan study (the New Cross Area Framework and Station Opportunity Study) and two require a sensitivity-led process in order to arrive at a decision on development density; however it is difficult to identify reasons for exploring an approach to density that differs significantly from that which emerges following application of the Council's methodology. The BLE would further enhance the PTAL in the vicinity of New Cross Gate station, and opportunities for an uplift in the number of homes delivered might be explored through the emerging **New Cross Area Framework**, which was recently published for consultation; however, any uplift in homes delivered would be modest. It is fair to assume an **uplift of c.10%**.
- 5.4.22 In **conclusion** there is a need to explore the approach to growth in this area as a variable across the reasonable growth scenarios. Specifically, there is a reasonable need to explore both the approach to density that emerges following application of the Council's preferred methodology and the **density uplift option** identified above (specifically, an uplift for the New Cross area).

Figure 5.8: Proposed North area allocations



East sub-area

- 5.4.23 Lewisham's eastern area comprises the neighbourhoods of Blackheath, Lee and Grove Park. It is made up of historic villages that formed along the route to Greenwich, which expanded dramatically with the arrival of the railways. The area forms the eastern edge of the Borough and this is reinforced by the continuous stretch of green and open spaces that run from Blackheath in the area's north to Elmstead Wood in the south. Green infrastructure, including the Green Chain Walk, is a key defining feature.
- 5.4.24 This area has a predominantly suburban character. This is reflected by the built form and layout of the Victorian terraces, the formal historic village of Blackheath, Georgian and Regency villas, as well as 20th century housing, interwar homes and council estates. Residential developments typically feature wide plots, large gardens and generous street sections.
- 5.4.25 This area contains the district centres of Blackheath and Lee Green. Blackheath has a very strong historic character and is a visitor destination. Lee Green is one of the Borough's smallest district centres and serves its local catchment with a mix of shops and services. It includes several large format retail units and the Leegate Shopping Centre, which was built in the 1960s and, following a planning application, a resolution is in place for its redevelopment. The centre suffers from areas of poorer quality public realm.
- 5.4.26 Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular. Grove Park station and the local centre comprise a gateway and focal point in the neighbourhood.
- 5.4.27 The Quaggy River, the upper reaches of which are known as Kyd Brook, passes through parts of this area at Chinbrook Meadows, where the river channel has been naturalised with river banks reintroduced to encourage wildlife. Much of the subsequent length of the river to the boundary with the London Borough of Bromley is within concrete channels or has been culverted.

- 5.4.28 The majority of proposed sites are uncommitted, in that they are neither consented nor is it the case that there are pre-application discussions at an advanced stage; however, the two most significant sites are committed, with only one of the uncommitted sites likely to yield in excess of 100 homes. None of the uncommitted sites require a sensitivity-led process in order to arrive at a density figure, the BLE would not impact on PTAL in this area and there are no other strategic reasons for exploring higher density options.
- 5.4.29 In **conclusion** it is reasonable for the approach to growth in this area to be **held constant** across the reasonable growth scenarios. Specifically, it is reasonable to hold constant the approach to density that emerges following application of the Council's preferred methodology.

Figure 5.9: Proposed East area allocations



South sub-area

- 5.4.30 This area includes the neighbourhoods of Bellingham, Downham and Bell Green. It derives much of its character from the interwar homes constructed by the London County Council (LCC). These estates were influenced by 'garden city' principles and provide for a relatively homogenous form of low density housing throughout the area. There are clusters of higher density residential uses around Grove Park and Beckenham Hill stations, and pockets of Victorian housing in Bell Green.
- 5.4.31 This area includes the district town centre of Downham that serves the local catchment, however it has a limited range of services and convenience shopping compared to other district centres in the Borough. The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of development sites.

- 5.4.32 Many of the train stations and town centres in the South Area are poorly connected to their surrounding neighbourhoods. Good linkages between key destinations are limited, and the area suffers from low levels of public transport accessibility. Along many of the key movement corridors there is a poor public realm, with many of these routes dominated by vehicular traffic.
- 5.4.33 The Bell Green neighbourhood is known for its out-of-centre retail park, including a superstore and other large format outlets, as well as their associated surface car parking. These retail uses are adjoined by the site of two former gas holders, which have now been dismantled. Some contemporary blocks of flats have been developed; however new development has generally been piecemeal.
- 5.4.34 The area is characterised by its green and open spaces, including waterways. The Pool and Ravensbourne rivers run north-south through the area. The Pool River, in particular, is a key feature and provides a valuable natural corridor, along with public access along the Waterlink Way. Beckenham Place Park, which is emerging as a key visitor destination, and has recently seen significant investment.
- 5.4.35 The great majority (all bar one of the sites proposed for housing) are uncommitted, in that they are neither consented nor is it the case that there are pre-application discussions at an advanced stage; however, none require a sensitivity-led process in order to arrive at a density figure.
- 5.4.36 However, as discussed, the Council has undertaken initial work to understand the potential to achieve higher densities at the six Bell Green / Lower Sydenham (BGLS) under a BLE Phase 2 scenario, including the two stand-out large sites, namely Bell Green Retail Park and Sainsbury's Bell Green. Initial work has been completed to suggest that under a BLE Phase 2 scenario (also assuming London Plan Opportunity Area status and funds to deliver infrastructure upgrades beyond rail) there could be potential to triple the number of homes delivered in this area (i.e. a **200% uplift**); and given uncertainties it is also considered reasonable to explore a notional **100% uplift**.
- 5.4.37 In **conclusion** there is a need to explore the approach to growth in this area as a variable across the reasonable growth scenarios. Specifically, there is a reasonable need to explore both the approach to density that emerges following application of the Council's preferred methodology and the **density uplift options** identified above.

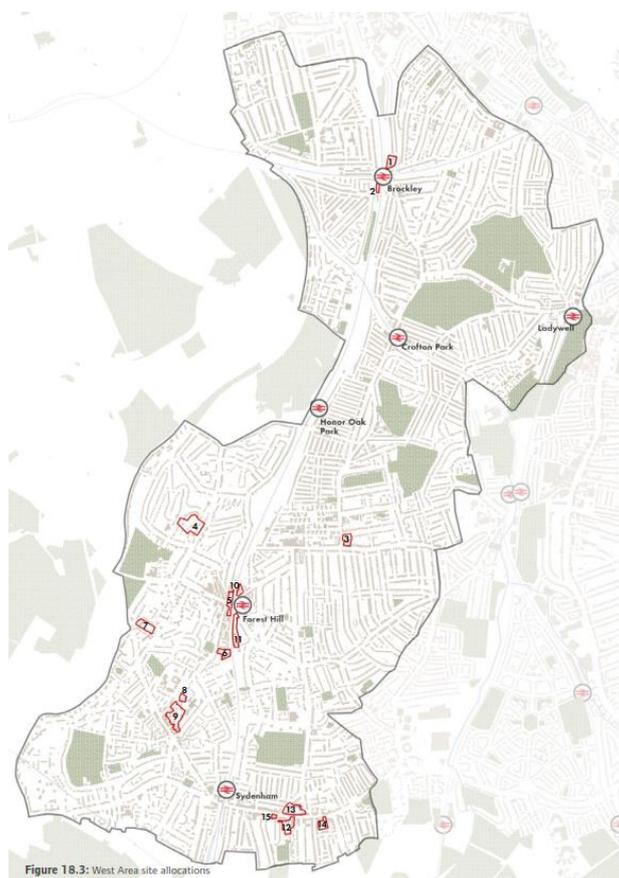
Figure 5.10: Proposed South area allocations



West sub-area

- 5.4.38 The area comprises nine distinct neighbourhoods, including: Telegraph Hill, Brockley, Crofton Park, Honor Oak, Blythe Hill, Forest Hill, Perry Hill, Sydenham, and Sydenham Hill. The area comprises a series of older villages that run north south, which developed around key railway stations.
- 5.4.39 The area is characterised by its topography and prominent green spaces with remnants of the Great North Wood. The railway line dissects the area and limits access between many neighbourhoods. The sidings and embankments also function as important habitat patches and biodiversity corridors. Whilst there are many parks and open spaces, the pedestrian and cycle links between these are varied.
- 5.4.40 The residential areas are predominantly low-rise with linear terraces and narrow street sections resulting in relatively high densities. The Western Area has a diverse built character that includes Victorian and Edwardian terraces, interwar 'garden city' inspired housing, post-war flats and council estates, and recent infill. The sub-area contains many conservation areas.
- 5.4.41 The district centres of Sydenham and Forest Hill have a diverse town centre offer and serve the wider neighbourhood. Some local centres (such as Ladywell) contain vacant and underused sites and have a poor quality public realm. The area has strong creative and digital industry clusters in Brockley and Forest Hill with links to Goldsmiths and Southwark College.
- 5.4.42 The majority of proposed sites are uncommitted, in that they are neither consented nor is it the case that there are pre-application discussions at an advanced stage; however, all bar one small site can safely be assigned a density figure using the standard methodology, as opposed to following a sensitivity-led process. Furthermore, BLE Phase 2 would not impact significantly on this area (whilst there would presumably be a BLE stop at Ladywell, there are no proposed allocations nearby (within this sub-area)) and there are no other strategic reasons for exploring higher density options.
- 5.4.43 In **conclusion** it is reasonable for the approach to growth in this area to be **held constant** across the reasonable growth scenarios. Specifically, it is reasonable to hold constant the approach to density that emerges following application of the Council's preferred methodology.

Figure 5.11: Proposed West area allocations



5.5 Establishing the reasonable growth scenarios

5.5.1 The final task was to explore ways of delivering the area-specific density uplift options in combination and determine those combinations that should be subjected to assessment (and consultation) as the reasonable growth scenarios. Table 5.4 summarises the sub-area options, serving to highlight that **the BLE is a prerequisite** for achieving an uplift in housing at all locations other than Catford.

Table 5.4 Summary of area-specific growth scenarios

Sub-area	Area	Potential to uplift growth over-and-above the baseline scenario ¹⁵
Central	Lewisham	BLE Phase 1 would enhance the PTAL, along with incentivising land assembly and site redevelopment, potentially leading to modest additional development opportunity (c.10%).
	A21 corridor	
	Catford	The baseline approach to density seeks to strike a balance between PTAL, regeneration objectives and constraints to tall buildings and is the emerging direction of travel from the Catford Town Centre Masterplan; however, there is potentially the option of delivering a tall buildings cluster and, in turn, a c.20% uplift in homes delivered. This is not necessarily dependent on BLE P2.
	Hither Green	No reasonable uplift option
North	New Cross area	BLE Phase 1 would enhance PTAL, along with incentivising land assembly and site redevelopment, potentially leading to modest additional development opportunity (c.10%).
	Elsewhere	No reasonable uplift option
East		No reasonable uplift option
South	Bell Green / Lower Sydenham (BGLS)	BLE Phase 2 would greatly enhance PTAL and lead to significant additional development opportunity, potentially leading to a c.200% uplift in development densities. It is also considered appropriate to explore a c.100% uplift.
	Elsewhere	No reasonable uplift option
West		No reasonable uplift option

5.5.2 Combining these sub-area scenarios leads to six borough-wide scenarios, which can be expressed either:

- in terms of a **baseline scenario**, involving indicative densities assigned to allocations as per the methodology set out in Table 5.3 (assuming no BLE) plus five higher growth scenarios defined in terms **percentage uplifts** on the baseline - see Table 5.5, Table 5.6 and subsequent maps; or
- in terms of the **total number of homes** delivered – see Table 5.7.

5.5.3 Box 5.1 recaps why these are the reasonable growth scenarios.

A note on windfall supply

5.5.4 The growth scenarios vary in terms of the number of homes delivered through allocations only; however, there is another important source of housing supply, namely supply at windfall sites (i.e. sites without an allocation; typically small suburban infill sites). Through the Local Plan the proposal is to uplift historic rates of windfall delivery, via a suitably permissive policy framework; however, the scale of uplift that can be achieved is currently uncertain.¹⁶ As such, the assumption at the current time is that there will be a continuation of past rates, which are in the region of 350 homes annually. This figure relates closely to the target set by Policy H2 of the Intend to Publish London Plan (2019), which is 379 homes per annum.

¹⁵ Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations, as per Table 5.3 (assuming no BLE).

¹⁶ See <https://lewisham.gov.uk/myserVICES/planning/policy/ldf/spds/small-sites-study>

A note on BLE assumptions

- 5.5.5 A key ‘driver’ of work to establish reasonable growth scenarios was recognition that the Council is continuing to work with the Mayor of London, Transport for London, adjoining local authorities and other key stakeholders to assess the potential impacts of BLE of supporting growth.
- 5.5.6 In turn, a key defining feature of the growth scenarios is the BLE assumption assigned to each. “No BLE” is the baseline assumption, but there is also a need to explore scenarios involving BLE Phase 1, which would extend to Lewisham, and BLE Phase 2, which would extend to Hayes via Lower Sydenham via potential stations at Ladywell and Catford Bridge.
- 5.5.7 It is recognised that the three BLE scenarios mean that the six scenarios are not all directly comparable, i.e. the six might alternatively be considered three sets of two.

A note on spatial assumptions

- 5.5.8 Scenario 1 is the baseline scenario, i.e. a scenario involving the ‘baseline’ approach to assigning indicative densities to site allocations. The assumption, for the purposes of assessment, is that the uplift in homes under Scenarios 2 to 6 would be achieved by assigning higher indicative densities to certain of the proposed allocations (i.e. sites within New Cross, Lewisham, Catford and BGLS). However, it is only in BGLS where firm assumptions are made regarding the precise sites that would see higher densities under Scenarios 2 to 6 (because the Council has undertaken initial work to establish that all six of the sites in question could likely support higher densities under a BLE P2 scenario). Also, in practice, it is recognised that certainty regarding the BLE could lead to one or more new sites being made available and ultimately identified as suitable for allocation (for example, through the greater incentive for landowners to assemble and deliver sites), such that higher growth is delivered through additional sites instead (or in addition to) higher densities at the sites currently identified.

Box 5.1 Summary explanation of the reasonable growth scenarios

The reasonable growth scenarios have been established in light of the legal requirement to explore “reasonable alternatives” as part of the IIA process.

In order to understand the reasons for arriving at the reasonable growth scenarios there is a need to read Section 5 of this report as a whole, which describes a step-wise process (summarised in Figure 5.1).

In summary a three-step process was followed.

- The first step was to consider strategic issues/options (‘top down’ factors) in respect of: 1) housing quantum; and 2) and broad distribution.
- The second step was then to give ‘bottom-up’ consideration to: A) site options in contention for allocation; B) the approach to assigning an indicative use mix to each allocation; and C) the approach to assigning an indicative density to each allocation.
- The third step was to identify sub-area scenarios, and consider how these might be delivered in combination borough-wide.

It is not possible to list out all unreasonable growth scenarios, but the following is a brief selection:

- Focus growth in the Opportunity Areas only – there are wide-ranging strategic objectives to be achieved through development of the identified site allocations outside of Opportunity Areas; furthermore, there is a need to recall the stretching nature of the London Plan housing target and the need to close the gap to LHN.
- Distribute growth more evenly across the Borough – this would involve higher densities and, in turn, taller buildings in locations that are relatively unsuitable for tall buildings. Also, the Opportunity Areas have been identified through the London Plan as suitable for concentrated growth and investment. Furthermore, the lack of identified potential development sites in some parts of the Borough compared to others (particularly in the East and West sub-areas), would significantly inhibit the deliverability of this approach.
- Meet LHN in full – a range of higher growth options have been identified; however, none would meet LHN in fully and most reasonable higher growth options are dependent on the BLE. The Council and AECOM will revisit the matter of closing the gap to LHN as far as reasonably possible subsequent to the consultation.

Table 5.5 The reasonable growth scenarios (summary)

Scenario	BLE assumption	Location for growth over-and-above the baseline*
1	No BLE	N/a
2		Catford (20%)
3	Phase 1	New Cross (10%); Lewisham (10%);
4		New Cross (10%); Lewisham (10%); Catford (20%)
5	Phase 2	New Cross (10%); Lewisham (10%); A21 corridor (10%); Catford (20%); Bell Green / Lower Sydenham (100%)
6		New Cross (10%); Lewisham (10%); A21 corridor (10%); Catford (20%); Bell Green / Lower Sydenham (200%)

Table 5.6 The reasonable growth scenarios (in terms of percentage uplifts on the baseline scenario)

BLE assumption		Approximate percentage uplift over-and above the baseline*					
		No BLE		Phase 1		Phase 2	
		Scenario	1	2	3	4	5
Allocations	New Cross	-	-	10%	10%	10%	10%
	Lewisham	-	-	10%	10%	10%	10%
	A21 corridor	-	-	-	-	10%	10%
	Catford	-	20%	-	20%	20%	20%
	Bell Green / Lower Sydenham	-	-	-	-	100%	200%
	Elsewhere in the Borough	-	-	-	-	-	-
Windfall		-	-	-	-	-	-
Total housing uplift		-	Increasing housing uplift →				

* Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations, as per Table 5.3 (assuming no BLE).

Table 5.7 The reasonable growth scenarios (in terms of total number of homes)

BLE assumption		No BLE		Phase 1		Phase 2	
Scenario		1	2	3	4	5	6
Allocations	New Cross	2010	2010	2210	2210	2210	2210
	Lewisham	4550	4550	5010	5010	5010	5010
	A21 corridor	340	340	340	340	380	380
	Catford	2460	2950	2460	2950	2950	2950
	Bell Green / Lower Sydenham	1540	1540	1540	1540	3090	4630
	Elsewhere in the Borough	14130	14130	14130	14130	14130	14130
Windfall ¹⁷	5,250	5,250	5,250	5,250	5,250	5,250	
Total homes 2020 - 2040		30,300	30,780	30,940	31,430	33,010	34,550
Increasing growth →							

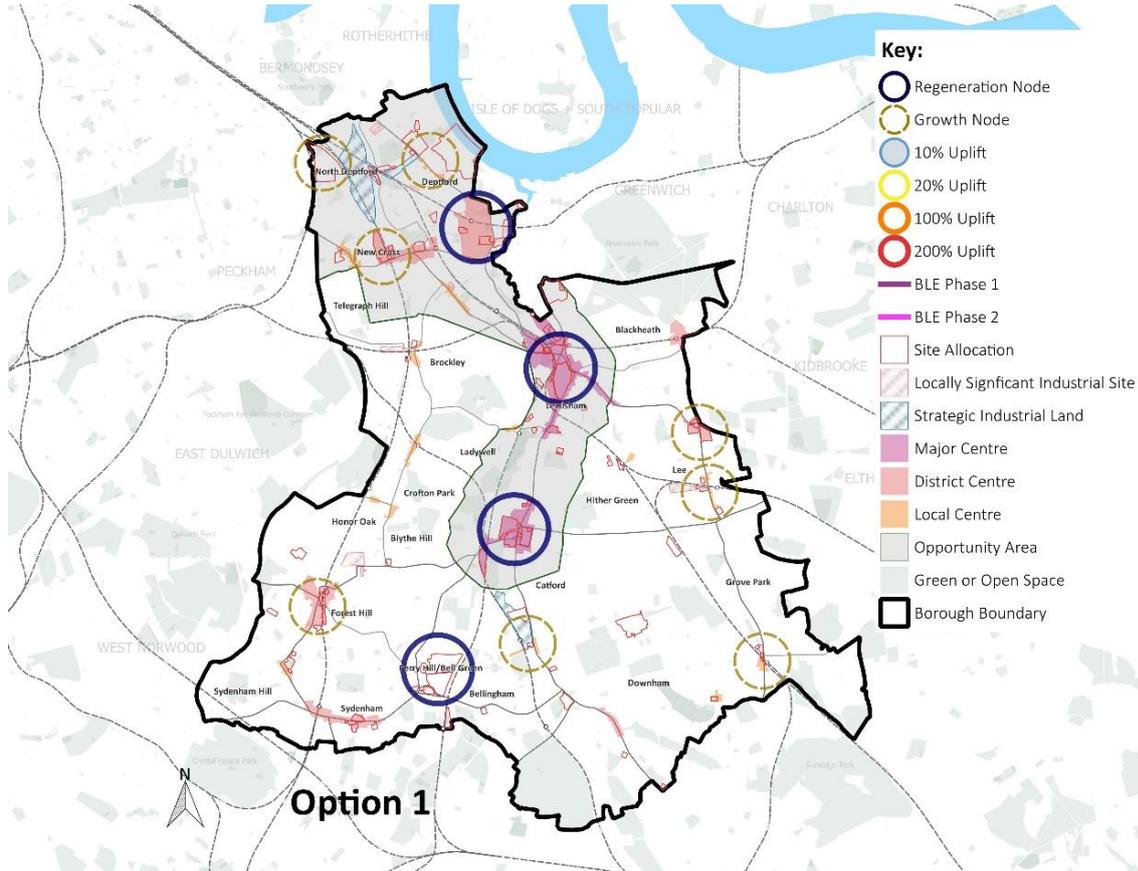
A note on delivery trajectory

Under Scenarios 1 and 2, all allocations are anticipated to deliver in the first 15 years of the plan period, such that the assumed trajectory of housing delivery would be high in the first 15 years (1,903 and 1,935 homes per annum under the two scenarios respectively) and then low in the final five years. However, in practice, the Local Plan must be reviewed every five years, hence there will be the potential to allocate additional sites to deliver in the period 2035 to 2040 through a Local Plan Review.

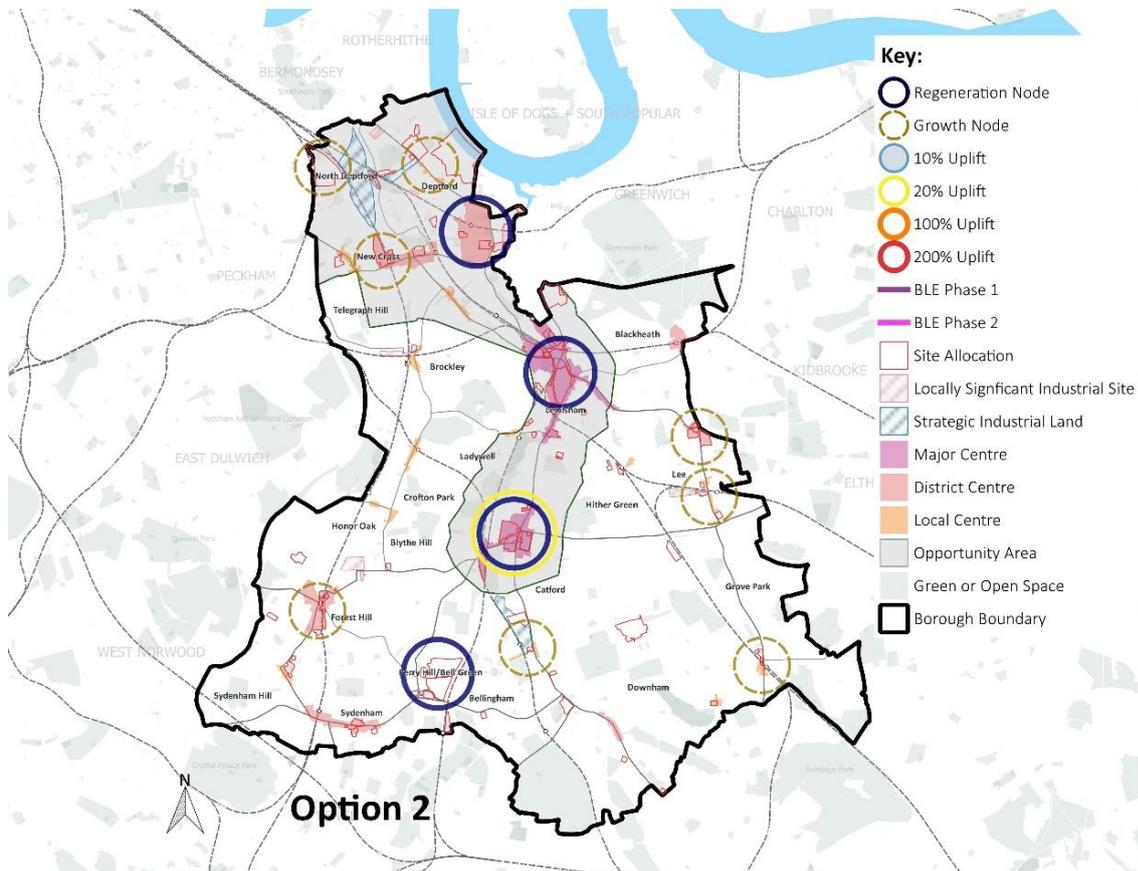
With regards to Scenarios 3 to 6, whilst some sites could potentially come forward at higher densities once there is certainty that the BLE *will be delivered*, other sites (in particular at BGLS) might need to be delayed or phased so that they come forward once the BLE *has been delivered*. As such, there is uncertainty regarding the delivery timescale / trajectory under the higher growth scenarios, and under Scenarios 5 and 6 in particular, because the timeline for any BLE Phase 2 is uncertain. If it were to be assumed that all allocations under Scenarios 5 and 6 would deliver in the first 15 years of the plan period then the rate of delivery in the first 15 years would be 1,979 and 2,187 homes per annum under the two scenarios respectively (notably in excess of the LHN figure, at it currently stands, which is 1,939 homes per annum).

¹⁷ Calculated as 350 homes per annum for the final 15 years of the plan period

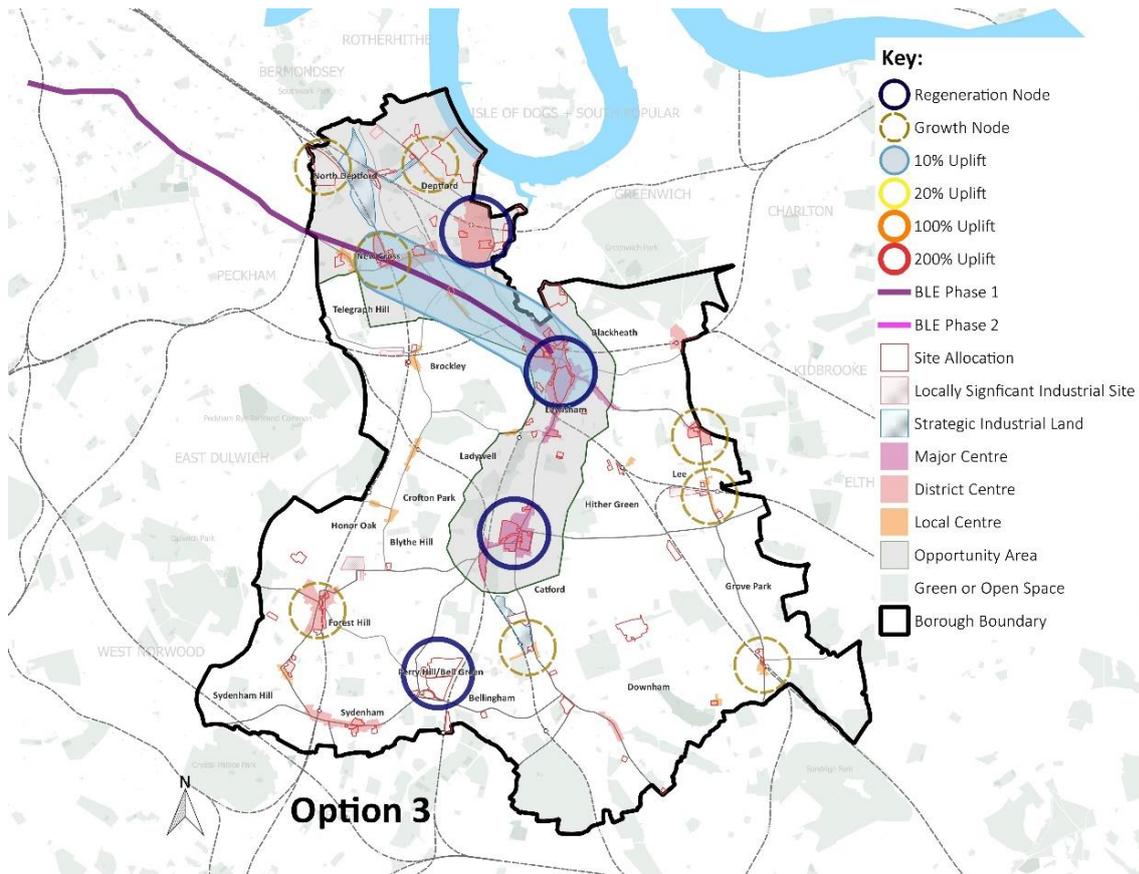
Scenario 1: No BLE; baseline approach to densities



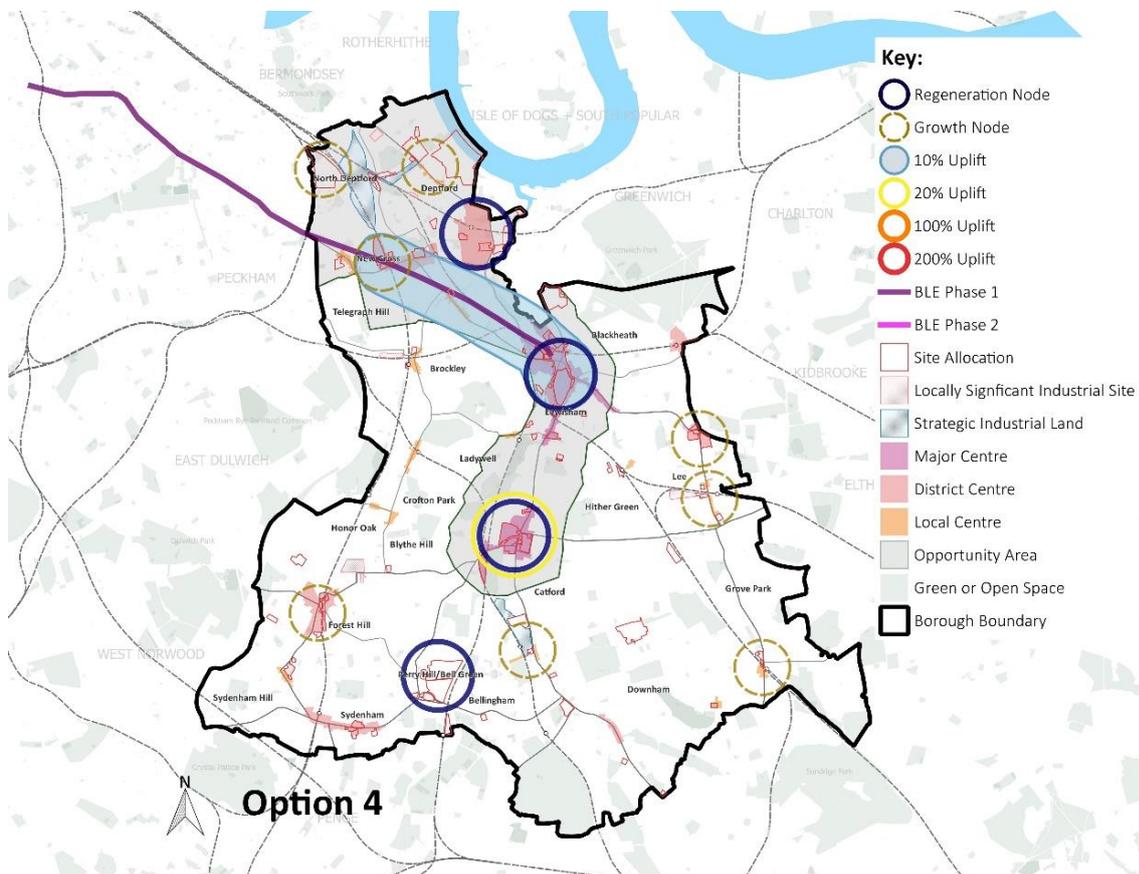
Scenario 2: No BLE; uplift at Catford (20%)



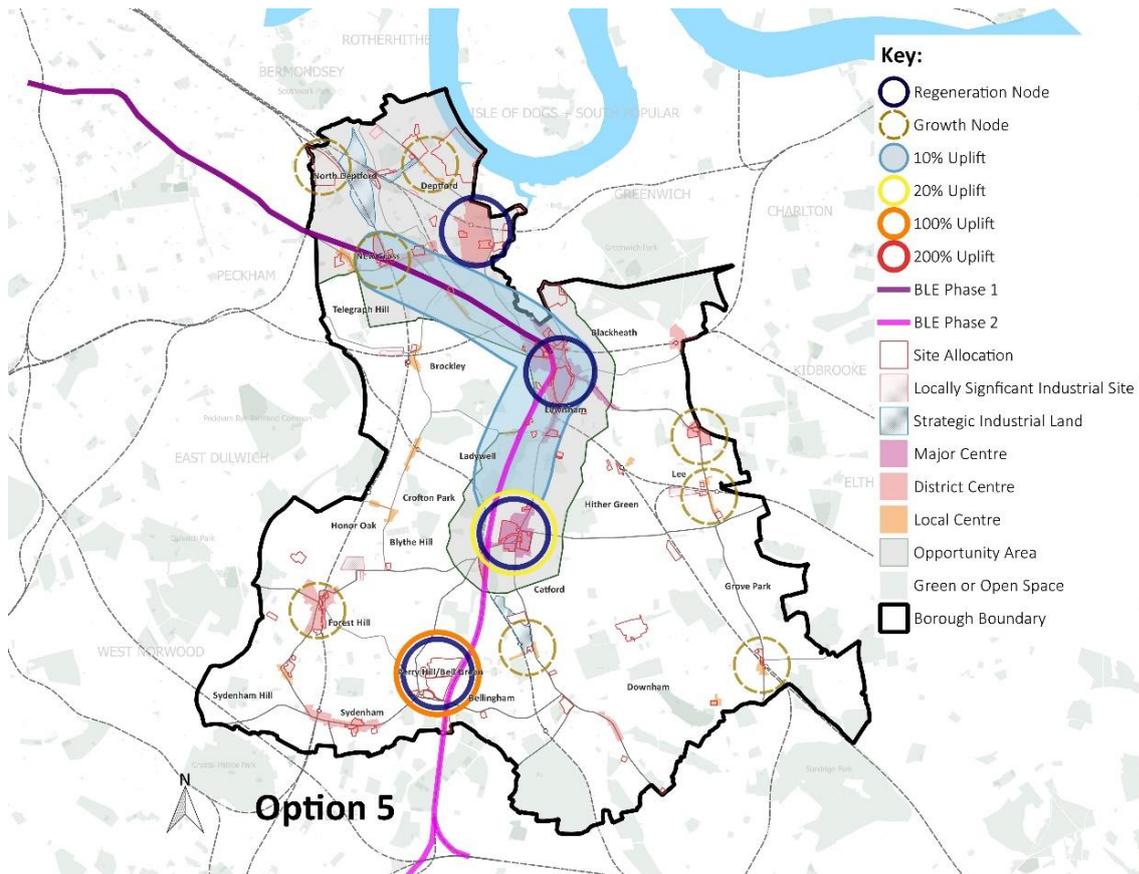
Scenario 3: BLE P1; uplift at New Cross and Lewisham (10%)



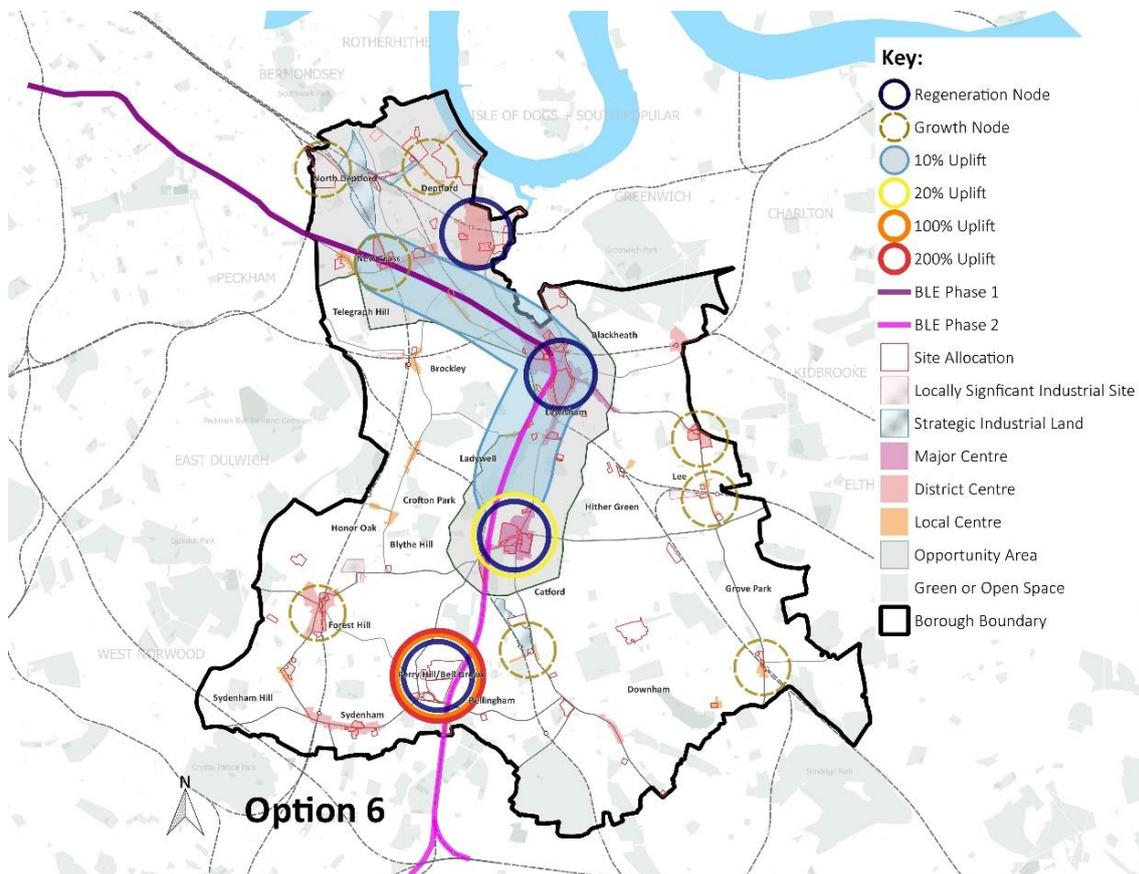
Scenario 4: BLE P1; uplift at New Cross and Lewisham (10%) and Catford (20%)



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



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



6 Growth Scenarios Assessment

6.1 Introduction

6.1.1 The aim of this section is to present an assessment of the growth scenarios introduced above.

6.2 Assessment methodology

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

6.2.2 Every effort is made to predict effects / differentiate the scenarios accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions this is made explicit in the assessment text.

6.2.3 Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the scenarios in combination with other planned or on-going strategic activities, including neighbouring Local Plans).

A note on BLE assumptions

6.2.4 It is important to note that the growth scenarios reflect three different BLE assumptions, namely no BLE in the plan period (Scenarios 1 and 2), BLE Phase 1 in the plan period (Scenarios 3 and 4) and BLE Phases 1 and 2 in the plan period (Scenarios 5 and 6). It is fair to assume that a new BLE station (New Cross Gate and Lewisham under Phase 1; Ladywell, Catford Bridge and Lower Sydenham under Phase 2) would trigger a host of associated station upgrade work, infrastructure upgrades and investment, as discussed within the Bakerloo Line Economic Impact Assessment (2020), and recognising that current national rail stations would need to be upgraded to TFL / London Underground standards. These upgrades are assumed *as part of the baseline*. It is not the aim of this IIA to assess BLE scenarios, reflecting the fact that a decision on the BLE will not be made through the Local Plan.

6.3 Assessment findings

6.3.1 Assessment findings are presented in the table below.

Table 6.1: Growth scenarios assessment (rank and effect categorisation)

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
Discussion							
<p>The assessment matrix above shows a mixed picture, with Scenario 1 performing well in certain respects (notably biodiversity, climate change adaptation (flood risk) and historic environment) and higher growth (with BLE) scenarios performing well in other respects (notably air quality, climate change mitigation, accessibility, housing and transport). Scenario 2 which would involve an uplift in homes without the BLE is found to perform poorly in respect of all IIA topics other than 'housing'.</p> <p>Having made these initial points, set out below is a discussion under the eleven topic headings that comprise the IIA framework:</p>							

Air quality and other pollution

There are currently six AQMAs in Lewisham, comprising a blanket AQMA covering the north of the Borough (north of the A205 South Circular) together with AQMAs along major roads in the south. Higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4) would see new housing at densities considerably above that which application of the London Plan Strategic Housing Land Availability Assessment (SHLAA) standard methodology would suggest is appropriate, which potentially gives rise to a concern in respect of generation of private car movements; however, growth would be delivered in the context of the Catford Town Centre Masterplan, which is exploring means of enhancing walking and cycling opportunities in the area and maximising the town centre offer (thereby minimising need to travel). Notably, realignment of the South Circular (A205) will address existing issues of severance and pollution, and another key opportunity is in respect of improving public access to the Waterlink Way by repairing the existing break in the path and extending the route to join with the River Pool Linear Park; a higher growth strategy could potentially assist with achieving these objectives.

With regards to **BGLS**, there is cautious support for a higher growth scenario (Scenario 6) from an air quality perspective. PTAL would be high given BLE P2 and there could be potential to deliver a new town centre with a considerable offer, which could go some way towards addressing current poor accessibility locally, which is associated with high car dependency. Growth could also facilitate investment in walking / cycling infrastructure (with major interventions to improve permeability across the Bell Green Gyratory, including through redevelopment of the Stanton Square Locally Significant Industrial Site), the urban realm, river re-naturalisation / greenspace and links between greenspaces (notably the Pool River, Beckenham Place Park, Sundridge Park and Crystal Palace Park), helping to address existing issues that serve to dissuade people from walking and cycling and, in turn, supporting reduced car movements and improved air quality.

With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, there are limited implications in respect of air quality, recognising that the uplift in densities would be in response to an increase in PTAL following the BLE. The A21 corridor, between Lewisham and Catford, is associated with a notable opportunity in respect of supporting walking / cycling, with the ambition being both to enhance the principal north-south route and develop a complementary network of legible, safe and accessible routes, including cycling Quietways, that link with it to enhance connections between neighbourhoods and destinations, including open spaces; however, it is difficult to conclude that a marginally higher growth strategy will have a significant bearing.

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

Biodiversity and green infrastructure

As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher densities at the same package of sites that would deliver Scenario 1, as opposed to through additional allocations, which potentially serves to reduce concerns in respect of higher growth scenarios conflicting with biodiversity and green infrastructure objectives. However, certain concerns still remain, recognising that higher density development can mean less space available within site boundaries for green and blue infrastructure.

This is particularly a concern on account of the fact that the central spine and transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley, associated with the Rivers Ravensbourne and Pool, and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework. Issues associated with higher growth in proximity to the river corridors are discussed further below, but suffice to say here that there are issues associated with certain sites at Lewisham, along the A21 corridor, at Catford and at Bell Green.

However, on the other hand, growth can support investment in green infrastructure, e.g. a high growth strategy at BGLS could support the aspiration to enhance the South East London Green Chain, which is a GI corridor that skirts the southern edge of this area; and growth at Catford should assist with realising opportunities to deculvert and naturalise the River Ravensbourne. These opportunities are potentially highly significant.

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

Climate change adaptation

In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone. At **Catford** the key site to consider is Wickes and Halfords, Catford Road, which is located between the Catford and Catford Bridge railway lines with the River Ravensbourne cutting diagonally through the site to the north in a covered channel. Residential uses would not be likely at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain. In the **north of the Borough, in Lewisham** and along the **A21** corridor flood risk zones intersect a number of proposed allocations; however, the great majority either have planning permission or are at an advanced stage of pre-application discussions, such that there is no assumption of higher density development under the higher growth scenarios; indeed, the only entirely non-committed site intersecting flood zone 3 and proposed for residential is Lewisham Shopping Centre (Molesworth Street Car Park is also uncommitted, but is proposed for 100% employment, i.e. a use that is less sensitivity to flood risk). At **BGLS** the eastern part of the proposed Bell Green Retail Park site, which would deliver a significant proportion of the additional growth under Scenarios 5 and 6, intersects fluvial flood risk zone 2, associated with the adjacent Pool River, and the Worsley Bridge Road Locally Significant Industrial Site skirts flood zone 3 (with the site notably falling between the railway line and the river, in a similar fashion to the Wickes and Halfords site at Catford); however, it is difficult to assume that higher growth scenarios (i.e. Scenarios 5 and 6) would lead to increased pressure to deliver homes in (or adjacent to, recalling the need to make allowances for climate change in the long term) the flood risk zone.

In **conclusion**, at this early stage in the plan-making process there is a need to conclude an “uncertain significant negative effect” for all scenarios, and to highlight a particular concern associated with higher growth scenarios, under which there *could* be less potential to leave areas at risk of flooding as green space. N.B. another climate change adaptation consideration relates to overheating risk in tall buildings – see discussion in Appendix IV.

Climate change mitigation

Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network. Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means proximity to a strategic heat source (which can be a source of ambient heat, given heat pump technologies) and/or a facility with a major demand for heating (also potentially cooling), such as a civic building; there is also a need to support strategic-scale mixed use schemes that achieve economies of scale and lead to a mixed and balanced heat/cooling demand profile. This serves to suggest merit in **higher growth** scenarios, noting that all of the growth locations in question, with the exception of the A21 corridor, are associated with strategic sites (e.g. in excess of 500 homes) and/or site clusters that might feasibly support one or more heat networks. In particular, there is a good degree of certainty regarding the potential to deliver a heat network in **Catford**, where the Lewisham Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstons College Jubilee Grounds. Also, in **Lewisham** (albeit the assumption under Scenarios 2 to 6 is only a modest 10% uplift in homes), the Energy Masterplan finds there to be a considerable opportunity: *“The redevelopment of the shopping centre, if realised, provides a catalyst to develop a future electrified heat network that will decarbonise and extend the existing networks in the area [which currently draw from CHP, which is no longer a low carbon technology in light of decarbonisation of the national grid]. Early engagement with the shopping centre is recommended to ensure this is captured within the masterplan. Heat supply opportunities include heat pumps (air source or the river) as well as heat recovery from cooling systems at the commercial areas and the Riverdale data centre.”* Higher growth at **BGLS** (Scenarios 5 and 6) also represents a clear opportunity, as this is a relatively unconstrained area and there will be the potential to link a mix of uses including employment; however, this opportunity is not examined by the Energy Masterplan. At **New Cross**, it is unclear whether a connection to the South East London Combined Heat and Power Station could be achieved, but there could be a heat network opportunity regardless (although no opportunity is highlighted in the draft Area Framework).

In **conclusion**, there is considerable support for all higher growth scenarios as the effect could be to realise opportunities to deliver heat networks. With regards to effect significance, one hand there is a need to recognise the urgency of supporting major interventions in support of climate change mitigation, as reflected in the Borough’s declaration of a Climate Emergency; however, on the other hand, climate change mitigation is a global issue such that it is difficult to conclude that local actions will result in a significant positive effect.

Communities 3 (Accessibility)

There are areas in the Borough experiencing multiple deprivation that could benefit from the investment associated with new development, particularly in terms of delivering new and enhanced infrastructure, including community infrastructure, and employment opportunities. The importance of delivering new and enhanced green infrastructure is also not to be under-estimated, particularly in light of the lock-down experience of 2020.

Higher growth at **BGLS** (Scenarios 5 and 6) represents a particular opportunity in this respect, recognising that this area falls within the defined Strategic Area of Regeneration that covers the south-eastern part of the Borough. The BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a 'dramatic rise' in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and-above those envisaged by the LEIA. It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA. A tall buildings cluster could bring with it a new town centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which might potentially form part of a new Regional Park in the future) a short distance to the south. One of the proposed allocations - Sydenham Green Group Practice - does comprise an existing large health centre; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure, linked to the public sector estate programme.

With regards to **Catford**, which is associated with a notable concentration of multiple deprivation, the proposal under Scenarios 1 and 3 is to assign indicative residential densities to the four sites within the Catford Town Centre Masterplan Area that accord with existing levels of public transport accessibility, on the basis that this will be supportive of wide ranging regeneration objectives. There could potentially be benefits associated with a higher growth strategy; for example (and in particular), a higher density scheme at Catford Shopping Centre and Milford Towers could help to ensure that net losses of main town centre uses (currently 13,699 m²) are minimised (recalling that the proposal is to re-provide main town centre uses within this location such that these uses comprise 33% of the total floorspace of the redevelopment scheme – see paragraph 5.3.15, above). However, benefits of a higher growth strategy for Catford are uncertain, as there is a need to consider the town centre's particular character and role, with its focus on civic and cultural functions, and its relationship with nearby Lewisham. The BLE LEIA (2020) discusses wide ranging opportunities that would result from a BLE station (also noting that realignment of the South Circular can be assumed, as it has Government funding), but it is difficult to conclude that benefits would be realised more fully or enhanced under a higher growth scenario.

There are also opportunities associated with the **A21 corridor**, where the aim is to transform the main road corridor and its environs into a series of liveable and healthy neighbourhoods. Particular opportunities include delivery of cycling Quietways and better linking neighbourhoods to large open spaces; however, it is difficult to suggest opportunities associated with a slightly higher growth strategy (Scenarios 5 and 6). In **Lewisham** a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme (450 dph, reflecting high PTAL) that will ensure a net gain in main town centre uses (currently nearly 45,000 m²), and there could be benefits to a modestly higher density scheme still (10% uplift) to secure a further net gain in town centre uses.

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

Communities 2 (Housing)

As set out in the footnotes to Table 5.7, **Scenario 1** would comfortably exceed the London Plan housing target (1,667 homes per annum over the period 2019 to 2029) and would close the gap considerably with LHN (currently understood to be 1,939 homes per annum, but potentially higher), with delivery of around 1,903 homes per annum in the first 15 years of the plan period (an important consideration in light of paragraph 15 of the NPPF, which states: "*Strategic policies should look ahead over a minimum 15 year period from adoption*"). Additional supply for the final five years of the plan period could then be identified through a Local Plan Review.

Scenario 2 would improve on this situation, virtually meeting LHN (as it currently stands) by delivering 1,935 homes per annum (although this is a gross figure, in that no discount is applied to account for delivery issues).

With regards to **Scenarios 3 to 6**, there is more uncertainty regarding the timeline ('trajectory') of housing delivery, because higher density schemes at certain sites might well need to be delayed or phased to coincide with delivery of the BLE; however, looking across the plan period as a whole, these higher growth scenarios perform very well, in that they would serve to close the gap considerably to LHN.

In **conclusion**, it is appropriate to place the growth scenarios in an order of preference according to development quantum. With regards to effect significance, all of the scenarios would lead to significant positive effects on the basis that the London Plan target would be met. It is also important to recall that work is underway at the current time to identify the potential to secure additional supply through increasing windfall delivery rates.

The spatial strategy does also potentially have implications for other 'housing' related matters; however, these are considered to be of secondary importance, relative to the matter of total housing quantum. One important consideration is that which is a focus of the BLE LEIA (2020), namely that under BLE scenarios (Scenarios 3 to 6) house prices locally will increase in the vicinity of BLE stations, thereby leading to more residents in need of **affordable housing**, which, in turn, suggests support for higher growth strategies (i.e. Scenarios 4 and 6 over Scenarios 3 and 5). The LEIA identifies a particular issue in Catford, stating: *"Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing."*

Communities 3 (other issues)

There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. Issues are particularly acute within the Strategic Area of Regeneration, which has the potential to benefit from a higher growth strategy (Scenarios 5 and 6), as has been discussed above. The BLE LEIA (2020) is supportive of the BLE to Lower Sydenham, including because the area *"has seen the largest increase in the number of claimants in the Corridor by a significant margin - a 21% increase in claimants is over 5 times the Corridor average"*, and it is fair to suggest that benefits would A) extend beyond the immediate station environs (the area which is the focus of the LEIA) and B) would be enhanced under a higher growth scenario. Specifically, a higher growth scenario could support some or all of the following SAR priorities discussed within the Draft Plan:

i. Enhancing provision of and access to high quality public transport infrastructure, including bus services; ii. Addressing barriers to movement by enhancing the network of pedestrian and cycle routes connecting to transport nodes, town and local centres, schools and training facilities, and employment locations; iii. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people; iv. Support the vitality and viability of town and local centres, helping to ensure they make provision for a wide range of accessible shops and services; v. Improve the environmental quality of neighbourhoods, including by reducing and mitigating pollution along main roads and junctions."

Issues are also relatively acute in Catford, with the BLE LEIA explaining that: *"Levels of deprivation rapidly increase when moving south through the BLE Corridor from Lewisham/Ladywell into Catford."* Again there may be growth related opportunities to address relative deprivation (Scenarios 2, 4, 5 and 6); however, there are also significant tensions, noting the potential to price out sectors of the existing population and small businesses, which would need to be addressed by way of targeted provision of affordable housing and workspace.

Access to high quality community infrastructure is critical and has been discussed above under the **'Accessibility'** heading, as has the related matter of improving access to transport infrastructure and improving the quality and permeability of the urban realm. Another closely related matter is access to green infrastructure, which has been discussed above under **'Biodiversity and green infrastructure'**. The discussion under both headings highlights issues and opportunities associated with higher growth scenarios at Catford and at BGLS.

Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the **'Housing'** heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.¹⁸ Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

Air and noise pollution is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects).¹⁹ Addressing the quality of the urban realm in Lewisham and (in particular) Catford, and also along the A21 corridor, is a focus of discussion above, including in respect of access to rivers and open space.

Further key considerations relate to the **Economy**, as discussed below. One key consideration is avoiding loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being “characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.” Another more discrete consideration relates to the accessibility of the public realm for those with **mobility** issues, including the disabled and the parents of young children. ‘Healthy Streets’ is a focus of analysis within the BLE LEIA (2020), with numerous opportunities to the BLE to lead to accessibility improvements to stations and their environs (amongst other things that contribute to Healthy Streets), including step free access at Catford and Ladywell; however, benefits are likely to accrue due to the BLE more so any decision to support higher growth.

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

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

Economy

By planning to meet employment needs the Local Plan can help to address the challenges facing high streets, assist in growing key sectors and clusters, and ensure that there is a range of employment opportunities available locally, including for those with lower education and skills within the Strategic Area of Regeneration.

Focusing on the growth scenarios, one immediate consideration relates to the implications of **higher growth** strategy for employment land provision and the effective mixed use redevelopment of existing employment sites. There are several proposals to redevelop existing Locally Significant Industrial Sites (LSIS), including two proposals at BGLS, namely at Stanton Square and Worsley Bridge Road. Focusing on Worsley Bridge Road, the assumption is that employment land will comprise 33% of total floorspace after redevelopment, which would mean that there is a net loss of employment space on site under Scenarios 1 to 4, but this loss could be mitigated under the higher growth scenarios (Scenarios 5 and 6) and there could even be a net gain in terms of total employment floorspace (because a higher density scheme will involve more homes / residential floorspace and, in turn, more employment floorspace). Maximising total employment floorspace is important, in light of the Employment Land Study (2019) target of delivering deliver circa 1,000 m² new B-class employment land per annum.²⁰ It is also important in light of local economic objectives around supporting micro and small sized businesses in target industries, particularly within the cultural, creative and digital sector, which will tend to be well suited to operating from higher density mixed use developments, for example a high density scheme at Worsley Bridge Road LSIS under a BLE P2 scenario. However, there is also a need to give consideration to more qualitative matters, namely the precise type and nature of B-class space that is provided and, and question whether the types of light industrial uses currently on-site will be able to continue to operate following higher density mixed use development. This is an important consideration, given trends across London for light industrial uses to move outwards and out of London; and there is a need to consider implications for those who rely on existing ‘industries at risk’ for employment, who might be geographically clustered and/or tend to be at risk of unemployment (see further discussion in Appendix IV). Having said this, in the case of the two LSIS in the South of the Borough proposed for mixed use redevelopment (higher density under Scenarios 5 and 6), it is recognised that this area is associated with high industrial vacancy rates.²¹

¹⁸ See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

¹⁹ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

²⁰ Importantly, this target was set having taken into account recent and forthcoming losses of (underused and vacant) employment land as part of regeneration in the North of the Borough facilitated by the Core Strategy (2011). In particular, the committed Convoys Wharf MEL scheme will lead to a net loss of 44,500 m² B-class floorspace, whilst the committed Timber Yard, Deptford Wharves at Oxestalls Road MEL scheme will lead to a net loss of 10,787 m².

²¹ The BLE LEIA states: “Conversely to the trend across the rest of the Corridor and trends across London, industrial rental values have decreased in recent years in Lower Sydenham. This could be a result of the high industrial vacancy rates that have been common in the area over the last 10 years due to the large supply of industrial space in this outer London location.”

Having made these points regarding risks to existing employment sites, it is also important to consider implications for delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The BLE LEIA (2020) is strongly supportive of the BLE in respect of the potential to enhance the economy of New Cross Gate, Lewisham, Catford and BGLS, and it may be that opportunities can be more fully realised via support for **higher growth** scenarios through the Local Plan. Focusing on Catford and BGLS, both locations are associated with low levels of employment in knowledge industries (3% for Lower Sydenham, compared to 16% for Lewisham and 32% for London), which is certainly an issue to be addressed. The downside can be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *“Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase...”* However, it is fair to assume that higher growth scenarios would be supportive of increased delivery of affordable workspace, with the LEIA suggesting: *“The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate.”* For Catford, the LEIA also suggests: *“extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses.”*

Laurence House and Civic Centre is a key proposed town centre allocation, in that it currently supports 18,700 m² employment floorspace. The rationalisation of older office stock may result in net loss of employment floorspace with redevelopment; however, this could be minimised / offset via a higher density scheme, which might also be supportive of wider objectives to deliver a new dedicated ‘employment quarter’ within Catford town centre providing a wide mix of business units. In a similar fashion, higher densities in the New Cross area (10% uplift under Scenarios 3 to 6) are supported as the effect would be to deliver additional employment land and workspace in the north of the Borough, which will help to meet identified needs, and compensate for a large net decrease in employment land over the plan period due to losses incurred through already consented schemes.

In **conclusion**, 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 important industries/sectors. Furthermore, under Scenarios 5 and 6 there is potential to transform the local economy of the BGLS area (although there is a need for work to explore the strategic role of an employment hub here). However, there is a degree of risk associated with mixed used redevelopment of existing employment sites under higher growth scenarios, in that provision of space for existing or future light industrial uses could be compromised or prove challenging to deliver. For this reason, uncertain positive effects are predicted.

Historic environment, heritage, character and culture

Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough’s varied history, which the Lewisham Characterisation Study (2019) breaks down into six periods: Ancient Lewisham (pre-1700s); Town and country (1700-1800); Unlocking the south (1800s-1850s); Rise of the commuter suburbs (1860-1914); Interwar (1915-1949); and Rebuilding Lewisham (1950s onwards). Settlement firstly followed the river valley as far as Catford, before higher land was developed in the mid-1800s. Higher density development under higher growth scenarios can inevitably lead to tensions with objectives relating to the historic environment and character, including on the basis that tall buildings can sharply contrast with historic townscapes. Notably, the 2019 draft Tall Buildings Report identifies a number of areas *“characterised by very consistent building heights”* and notes that such areas could have particular sensitivity to the development of tall building clusters.

In this context, **Catford** is found to be more sensitive to taller buildings than the other locations under consideration here as potentially suitable for higher densities, with a key consideration being the distinctive character of The Broadway, and the buildings of townscape merit that line it (albeit there is only one listed building, which is the grade 2 listed Broadway Theatre), and another consideration being the adjacent and expansive Culverley Conservation Area, which is an Edwardian residential suburb. The **A21 corridor** also stands out as sensitive, albeit the proposal under Scenarios 5 and 6 is to deliver only a modest uplift to densities. In particular, Ladywell Play Tower is highly constrained, with the site strongly associated with several listed buildings and highly accessible with the Waterlink Way passing through the site from Ladywell Fields in the west; however, the site is at the pre-application stage, such that its future is likely outside of the control of the Local Plan, and the specific proposal is that residential development (33 homes) can help to facilitate the restoration and enhancement of the Ladywell Baths, which is currently on the Heritage at Risk Register. Also, the PLACE/Ladywell (Former Leisure Centre) proposed allocation is adjacent to St Mary’s Conservation Area.

Conversely, Lewisham, New Cross and BGLS give rise to more limited concerns, in respect of higher densities; however, that is not to suggest that these areas are without constraint. At **Lewisham** several sites are assigned indicatively lower densities under Scenario 1 on the basis that they are associated with the transition between the town centre and neighbouring residential areas. At **BGLS** there is a need to consider the cluster of listed buildings / structures associated with Livesey Hall War Memorial, which is adjacent to the west of the gas holders site; the character of the Bellingham Estate to the east (influenced by ‘garden city’ principles); and locally important buildings within the Stanton Square LSIS site, including a well-preserved art deco building.

Finally, it is important to note that an archaeological priority area follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement. It is difficult to conclude, however, that higher density development in this area under Scenarios 2 to 6 leads to any concerns, in respect of the potential for full archaeological works.

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

Land and natural resources

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

Transport

Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford.

As discussed above under 'air quality', a matter of potential overriding importance is matching development densities to PTAL, and on this basis it is appropriate to highlight a degree of concern associated with higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4), albeit there is uncertainty as Catford town centre has an excellent PTAL rating of 6a and higher growth would be delivered via the Catford Town Centre Masterplan. With regards to **BGLS**, as discussed under 'air quality' and 'accessibility', there is cautious support for higher growth scenarios (Scenarios 5 and 6) from transport perspective, although there remains much uncertainty ahead of masterplanning work. With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, it is difficult to conclude that a small uplift in the number of homes delivered would lead to any notable issues or opportunities, as discussed above.

In **conclusion** (and recalling that the aim of this appraisal is not to appraise the effect of BLE expansion options, but rather the effect of Local Plan options under three BLE scenarios) the scenarios perform as per the discussion under 'air quality', above. Moving forward, there should ideally be a re-examination of spatial growth scenarios / 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.

7 Developing the preferred approach

7.1 Introduction

- 7.1.1 The aim of this chapter is to present the response of LB Lewisham to the growth scenarios appraisal or, in other words, the Council's reasons for supporting the preferred option, on balance, recognising that the appraisal finds it to be associated with both pros and cons.

7.2 The Council's reasons

- 7.2.1 The following text has been **provided by the Council**:

The London Plan forms part of Lewisham's statutory development plan. It therefore provides the starting point for considering the spatial strategy, recognising that Lewisham's new Local Plan must be in general conformity with it. For Lewisham, the key strategic spatial elements of the London Plan, and the emerging New London Plan (which is centred on policies and principles for achieving 'Good Growth'), include:

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

Giving consideration to this regional context, along with the requirement to seek to address Local Housing Need (LHN) in line with the NPPF, the council has undertaken a rigorous review of land that is available for redevelopment, and which is likely to be deliverable and developable within the plan period. Informed by this review, a number of alternative growth scenarios have been established and considered. These scenarios take into account the different phases of delivery of the Bakerloo Line Extension (BLE), which is included in the New London Plan as key strategic infrastructure; the Local Plan aims to capitalise on the BLE as a key driver for growth, regeneration and economic development; to help address the causes of deprivation locally by improving transport accessibility throughout the borough; and to address the environment, such as by reducing carbon emissions and improving air quality, by promoting modal shift away from private cars to walking, cycling and the use of public transport.

The appraisal highlights higher growth scenarios as performing well in a number of respects, albeit there would also be environmental tensions, which would need to be appropriately managed. The appraisal also raises uncertainties with respect to the potential impacts of growth scenarios on the achievement of economic objectives, highlighting some of the tensions around industrial land management in the context of significantly boosting housing supply.

Tensions between growth sceneries and the achievement of certain sustainability objectives are acknowledged, and the Local Plan therefore proposes to include detailed policies that support the spatial elements of the plan, and will provide greater certainty about the outcomes sought by the Local Plan, and how impacts should be managed and mitigated. For example, and in particular, policies for employment land will help to ensure that the development and use of land is effectively managed, so that identified long-term needs for business and business space can be met whilst promoting a more inclusive economy. A positive and proactive approach is advocated by the plan to grow the local economy, building on the area's economic strengths, and recognising the potential for the BLE to drive forward economic development. The Local Plan also aims to provide a coherent local framework for responding to the climate emergency, including detailed policies around the protection and enhancement of green infrastructure to deliver net gains in biodiversity.

Through the Local Plan, the council is seeking to deliver a significant increase in genuinely affordable housing across the borough, in tandem with addressing identified housing needs as far as possible; however, the ability to meet higher housing targets prescribed by the London Plan and national planning policy, is highly dependent on the delivery of strategic infrastructure to both enable and appropriately support growth, particularly the BLE. All higher growth scenarios assessed above, other than Scenario 2, assume the BLE is delivered within the plan period; however, in practice delivery is uncertain. Whilst the London Plan sets out a commitment to deliver the BLE and directs boroughs to safeguard land and plan positively to support its delivery, as of yet, it is not fully funded.

In the absence of certainty over the BLE there is a need to progress a spatial strategy in-line with **Scenario 1**, and to give some further consideration to Scenario 2 as a reasonable alternative, albeit the appraisal finds Scenario 2 preferable to Scenario 1 only in respect of 'housing' and 'economy'.

However, there is also a need to progress the Local Plan in the knowledge that certainty in respect of the BLE could be attained ahead of plan finalisation, and that under this scenario the Local Plan should provide sufficient flexibility to respond quickly, ensuring the capacity of sites is optimised through the commensurate uplift in public transport accessibility. The growth scenarios have explored a number of potential responses to the BLE and, whilst there would be a need for further work to explore opportunities at all locations in proximity to a new BLE station, at this time the option of a more ambitious scheme at BGLS stands-out as performing well.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an assessment of the Draft Local Plan.

8.2 Assessment methodology

8.2.1 The assessment identifies and evaluates ‘likely significant effects’ of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the IIA framework (see Table 3.1).

8.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited.

8.2.3 Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness).

8.2.4 In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits of the Draft Local Plan in more general terms.

8.2.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Draft Local Plan to impact on the baseline when implemented alongside other plans, programmes and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

Limitations

8.2.6 An important limitation to note relates to the timing of the assessment. Specifically, the assessment was undertaken alongside plan-making, leading to a challenge in respect of ensuring that all late changes and adjustments to the plan were then reflected in the appraisal. It is recognised that the final version of this SA Report – namely that version which is published and submitted for examination alongside the Local Plan – will need to be entirely up-to-date.

Adding structure to the assessment

8.2.7 Whilst the aim is essentially to present an assessment of the Draft Local Plan ‘as a whole’ in respect of each of the elements of the IIA framework in turn, it is also appropriate to give some consideration to individual elements of the plan in isolation. As such, each of the topic-specific assessment narratives is broken-down under sub-headings – see Table 8.1.

Table 8.1: Structure of each topic-specific assessment narrative

Sub-heading	Aims of the narrative
Commentary on the spatial strategy	Discuss the proposed approach to site allocation – see Box 8.1 - taking account of area and site specific policy.
Commentary on development management policies	Discuss the development management policies that will apply to all planning applications borough-wide.
Assessment on the plan as a whole	Predict and evaluate significant effects in respect of the Draft Local Plan and make recommendations.

N.B. Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

Box 8.1 Summary of the proposed spatial strategy

Policy OL1 (Delivering an Open Lewisham) presents the spatial strategy, including the Local Plan Key Diagram (see Figure 8.1). In summary, the spatial strategy involves focusing growth at:

- The two designated **Opportunity Areas**,
 - albeit the majority of growth that will occur in these areas over the plan period is already committed (in particular Deptford Creek / Greenwich Riverside and, to a lesser extent, Lewisham);
- The **Strategic Area of Regeneration** that extends across the south and southeast of the Borough;
- Lewisham and Catford **town centres** and the **district town centres** at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham;
- The **A21 corridor** (Lewisham High Street, Rushey Green and Bromley Road) and, to a lesser extent, other strategic corridors (such as the east-west New Cross Road / A2 corridor);
- Locations that will support the case for strategic **infrastructure upgrades**, in particular a focus at Bell Green and Lower Sydenham with a view to supporting Opportunity Area designation and the BLE Phase 2;
- Proactively seeking to optimise **densities** at sites, including supporting higher densities, in appropriate locations, where this serves to secure a good mix of uses, including affordable housing and workspace;
- Proactively supporting development of **smaller sites**, leading to sensitive intensification for some more suburban areas, in line with the ambition set out by the Draft London Plan 2017.

The total capacity of the proposed allocations is circa 25,000 homes, and it is expected that all of these sites will be delivered within the first fifteen years of the plan period. Additionally, in this fifteen year period the current assumption (potentially subject to upwards revision pending further work) is that an additional 3,500 homes will be delivered at windfall sites, leading to a total supply figure over the period 2020 to 2035 in the region of 28,500 homes, or 1,900 homes per annum on average. However, it does not necessarily follow that this figure should be set as a housing target, for the purposes of monitoring (and five year housing land supply and Housing Delivery Test calculations), as it is inevitably the case that not all of the 81 sites will deliver as anticipated. The matter of setting a housing target will be revisited subsequent to this current consultation.

A final element of the proposed spatial strategy is proposed 'plan B' for the cluster of proposed allocations at **Bell Green and Lower Sydenham**. Specifically, the Local Plan is clear that there will be the potential to deliver significantly higher densities under a scenario whereby BLE Phase 2 comes forward in the plan period.

The proposed strategy, in respect of homes, breaks down by sub-area as follows (rounded):

- **Central** – 7,900
- **North** – 12,500
- **East** – 1,300
- **South** – 2,300 or up to 5,500 under a BLE P2 scenario
- **West** – 1,050

With regards to **employment land** (i.e. B-class land of all types) the proposal is to meet and exceed the headline target established by the Employment Land Study (ELS, 2019), which is that there is a need to deliver a net increase in total employment land (i.e. across all B-class uses) of around 1,000 m² per annum (specifically, a net increase of around 18,000 m² by 2038). Importantly, the ELS target is established from a baseline position that assumes that all existing consented schemes are implemented, including major schemes in the north of the Borough that will see a large net loss of employment space (a net loss of 69,000 m² in total, with the great bulk at the committed Convoys Wharf MEL scheme, which will see a net loss of 44,500 m²).

Finally, there is a need to consider the proposed strategy for **main town centre uses**. In this respect, the proposed strategy will deliver a significant net gain, with much of this resulting from large net increases at two committed sites, namely Lewisham Gateway (22,800 m²) and Convoys Wharf MEL (50,400 m²). However, the proposed strategy would see an overall net loss in one of the Borough's sub-areas, namely the East of the Borough, largely due to Leegate Shopping Centre, where the proposed scheme (there is a consented scheme from 2016, with a new application in 2018) would see a net loss of space for main town centre uses.

Figure 8.1: The proposed growth strategy (Figure 3.8 from the Draft Local Plan)

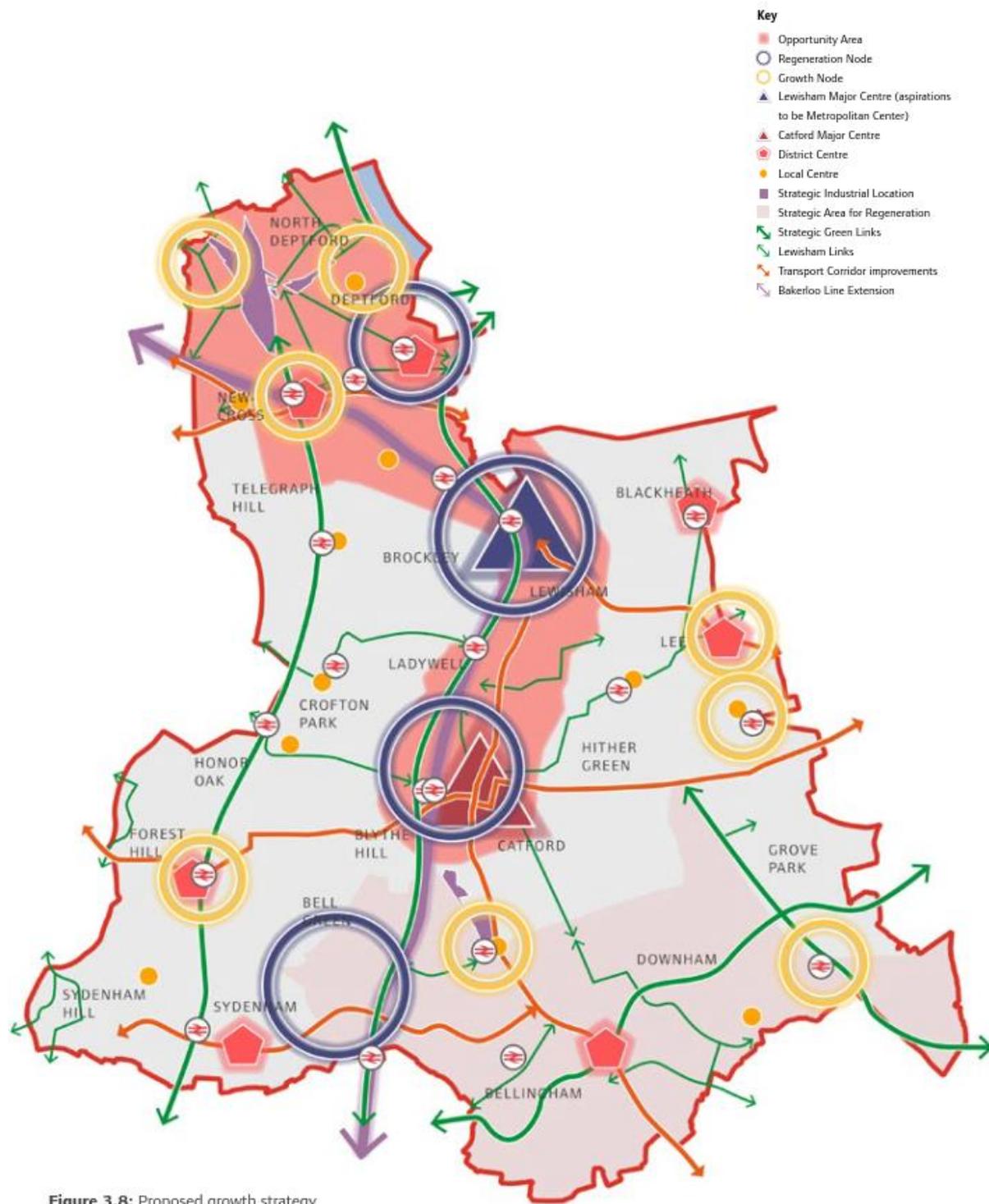


Figure 3.8: Proposed growth strategy

A note on committed elements of the spatial strategy

- 8.2.8 A significant proportion of the proposed allocations already have planning permission, and others are at a stage where pre-application discussions are advanced, such that there is a strong likelihood that they will gain planning permission prior to the Local Plan being adopted. Where this is the case it is fair to assume that the plan will have little or no bearing on development, albeit it is recognised that it is not uncommon for revised applications to be submitted. Site allocations are provided for consented schemes to ensure certainty of outcomes over the long-term.
- 8.2.9 It follows that these elements of the spatial strategy need not be a focus of the assessment. There is a need for the assessment to focus on those elements of the spatial strategy that will be most affected by the plan, taking commitments / near commitments into account as an element of the future baseline.
- 8.2.10 In particular, in the **north of the Borough** 74% of the new homes set to come forward at allocations in the plan period are already committed, and this figure rises to 86% with the addition of sites at the pre-application discussion stage. The following bullet points provide an overview of anticipated change in the north of the Borough, which can be considered part of the future baseline:
- By 2040 the North Area will have become a more attractive place to live, work, study, visit, and travel within. Major committed schemes – most notably Convoys Wharf (3,500 homes, 15,500 m² employment, 50,400 m² town centre uses), Deptford Timberyard (3,500 homes, 5,400 m² employment, 5,000 m² town centre uses) and Surrey Canal Triangle (3,600 homes, 15,000 m² employment, 32,000 m² town centre uses) - will be well integrated into the area with both new and existing residents benefiting from the close proximity to employment, retail, and leisure uses.
 - The employment offer will be transformed through new employment floorspace as part of mixed-use development on former industrial/MEL sites including Convoys Wharf and Surrey Canal Triangle.
 - The area will continue to emerge as one of London's leading centres for the creative and digital industries, with a successful Creative Enterprise Zone, with the Council working in partnership with world class institutions such as Goldsmiths, Lewisham College, the Albany, and Laban Centre.
 - The historic high streets of Deptford and New Cross will be strengthened through high-quality new development clustered around rail stations, a new local centre for North Deptford will be created at Evelyn Street, serving Convoys Wharf and Deptford Market will continue to be protected and enhanced.
 - The Council in partnership with TfL will have explored the issues of severance and congestion on the A2 corridor, which will have been transformed into a pedestrian and cycle friendly corridor. Development either side of New Cross Gate train station will have facilitated the Route 1 cycleway and there will be improved pedestrian and cycling connections more widely, building on the North Lewisham Links.
 - The area will have improved public transport, including a new train station at Surrey Canal Triangle, new river bus service at Convoys Wharf and improved bus services, and the arrival of the BLE will – if secured - have a transformative effect on the entire neighbourhood.
 - Across the area heritage assets will have been enhanced and protected including non-designated assets on New Cross Road, and within the Deptford High Street conservation area. Improvements to the general public realm will have addressed the condition of many of the communal spaces within the estates, and to provide additional tree coverage. There will be improved public access to Deptford Creek and to the Thames, and better links between key green spaces including the New Cross Nature Reserve and Waterlink Way, with Convoys Wharf facilitating a new waterfront destination.
- 8.2.11 Other notable committed or near committed sites that are not a focus of the assessment include:
- Lewisham town centre – around 52% of the planned homes are already committed or near committed, including the large Lewisham Gateway (1,057 homes) and Lewisham Retail Park (536 homes) sites.
 - East of the Borough – around 72% of the planned homes are already committed or near committed, including the two largest sites - Heathside and Lethbridge Estate (443 homes) and Leegate Shopping Centre (450 homes).
 - South of the Borough – only one site is committed or near committed, namely the Excalibur Estate (203 homes; one of two estate regeneration schemes set to come forward in the plan period).
 - West of the Borough – almost all allocations are entirely uncommitted, with just two of the allocations comprising consented schemes, which together will deliver 66 homes).

9 Assessment of the Draft Local Plan

9.1 Introduction

9.1.1 The aim of this section is to present an assessment of the draft plan under each of the IIA topic headings.

9.2 Air quality and other pollution

Objective: Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.

Commentary on the spatial strategy

9.2.1 The proposed spatial strategy (see Box 8.1 and Figure 8.1) 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' (including taxis) amongst the Borough's residents and, in turn, minimise traffic and associated air pollution.

9.2.2 Having made this initial commentary on the spatial strategy, the following more detailed points are made:

- The Council's approach to calculating indicative **densities** for the suite of uncommitted proposed allocations is a key consideration here, in particular the weight given to Public Transport Accessibility (PTAL). Gross indicative densities (i.e. densities calculated before having accounted for the need to provide for non-residential uses) at uncommitted sites range from c.130 to 150 dwellings per hectare (dph) on average in the south and east sub-areas, where PTAL is relatively low, to c.280 - 290 dph on average in the central and north sub-areas, where PTAL is relatively high. Capacities for uncommitted sites have mostly been established using a standardised methodology, building on the approach set out in the London SHLAA, which informed the draft London Plan; however, in eleven instances densities have been revised downwards to reflect local sensitivities. For example, and potentially of note, the proposal is to reduce the indicative densities for the two adjacent sites at New Cross Gate (Former Hatcham Works, New Cross Road (912 homes); and Goodwood Road and New Cross Road (121 homes) below the SHLAA figure to reflect local sensitivities, including heritage. This is despite the two sites potentially set to be located near adjacent to a Bakerloo Line station, if BLE Phase 1 goes ahead.
- The **north sub-area** is notable for falling within an AQMA and being associated with cluster of recently completed and committed sites where the densities exceed the level that might be expected given their PTAL (reflecting wider Opportunity Area and regeneration objectives), which might feasibly give rise to concerns in respect of travel by private car. For example, the final *net* residential density (i.e. taking account of the final number of homes delivered on site) at:
 - Surrey Canal Triangle MEL site (3,600 homes; consented) is 340 dpa;
 - Achilles Street (651 homes; pre-application stage) is 465 homes; and
 - Creekside Village East (393 homes; pre-application stage) is 644 dpa.

In this light, there is a need to scrutinise the plan proposal to reduce densities to figures below that suggested by the London Plan SHLAA methodology at four out of the seven uncommitted proposed allocations, due to local character, townscape and heritage sensitivities. In particular, as discussed above, there is potentially a transport and air quality argument for applying the London SHLAA methodology derived density figure at the proposed allocations adjacent to New Cross Gate station. However, on the other hand, there is an argument for limiting growth in this sub-area as a whole, even where PTAL is high (or set to become high), given committed growth and air quality issues.

- The cluster of six proposed allocations in the **BGLS** area are all uncommitted, and the proposal is to assign an indicative density on the basis of the London Plan SHLAA standard methodology, which leads to a low average density in the region of 95 dpa given low PTAL. However, the Local Plan is also clear that under a BLE phase 2 scenario there would be support for a reassessment of the area's potential to accommodate much higher densities, commensurate with the significant change in PTAL levels, and potentially taller or tall buildings.

Alongside this higher density development would be delivered a new town centre with a considerable offer of services, facilities, retail and employment, which could go some way towards addressing the issue of poor accessibility locally, which has led to much of the southern part of the Borough being designated as a Strategic Area of Regeneration, and which the plan document describes as being associated with “*few community facilities and limited employment opportunities*”. Strategic growth could also facilitate investment in walking / cycling infrastructure, the urban realm, greenspace (e.g. re-naturalisation of the Pool River) and links between greenspaces (notably the Pool River, Beckenham Place Park, Sundridge Park and Crystal Palace Park), helping to address existing issues that serve to dissuade people from walking and cycling and, in turn, supporting reduced car movements. Much of this area is not designated as an AQMA (which is rare in the London context).

- Aside from the matter of carefully matching assigned indicative development densities to PTAL levels, there is also a need to consider site-specific policy that will ensure that developments, both in isolation and in combination, deliver upgrades to **urban realm** and local movement infrastructure that support active modes of travel (also such that exposure to sources of air and noise pollution is minimised). Notable issues/opportunities set to be addressed through the spatial strategy include:
 - **Catford** - the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, has led to high levels of severance and poor permeability and legibility. The proposed Laurence House allocation will support delivery of a realigned South Circular road, creating a cohesive town centre and improved accessibility along the approach to Catford and Catford Bridge train stations; however, details remain uncertain at this stage, with the proposed site specific policy stating that the Council will: “*Work in partnership with Transport for London to deliver the realignment of the A205 South Circular, ensuring it is integral to the development of the site.*” It is also recognised that further work is needed to resolve the matter of loss of Metropolitan Open Land (MOL) that would result from the road realignment. Aside from the South Circular realignment, the intention is also to support a much-improved public realm and movement framework, as well as new greenspace, potentially with benefits from an air quality perspective. The emerging Catford Town Centre Masterplan explains:

“Addressing issues relating to the poor quality of the environment and public realm are key to achieving [objectives] and the ambition is to establish Catford as an exemplar of the ‘greening’ of a town centre. The objective is to transform what is today a noisy and fast pace urban environment into a more tranquil, cleaner, healthier and more sustainable town centre for the benefit of people, urban wildlife and ecology. Enhancing the sense of arrival at the two Catford stations will be delivered through an upgraded public realm with a focus on generosity of space and connectivity for pedestrians and cyclists.”
 - **Lewisham** - the stand-out large Lewisham Shopping Centre site is key to the renewal of the town centre and will play a critical role in linking sites and neighbourhoods surrounding it. The proposed site specific policy states: “*The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre. This will require significant reconfiguration and re-orientation of the existing buildings and spaces to achieve clearly articulated east-west and north-south corridors.*” The matter of reconfiguring open space in order to realise net benefits is discussed in Appendix IV of this report. Lewisham Gateway is notable as a major permitted site (1,060 homes) that will see open space reconfigured as part of: “*A programme of river restoration, including channel re-profiling, to improve the ecological quality of the water environment and enhance the amenity provided by the Rivers Quaggy and Ravensbourne, along with Waterlink Way [to include a] central landscaped open space that celebrates the confluence of the rivers.*”
 - **The A21 corridor** - is currently dominated by traffic with a poor quality public realm and pedestrian and cycle environment. With regards to that part between Lewisham and Catford, much of the road corridor is dominated by larger sites and blocks leading to irregular east-west connections, with the potential for development to enhance the network of smaller connector streets, provide clear and logical crossing points and enhance links between the A21 and the river corridor / Water Link Way; however, the proposal is to assign the only uncommitted site (PLACE/Ladywell; Former Ladywell Leisure Centre) an indicative density following a design-led methodology, which could feasibly lead to some opportunities missed in respect of investment.

With regards to the A21 corridor south of Catford, two key proposed allocations are Ravensbourne Retail Park and Homebase/Argos, Bromley Road, where the proposal is to deliver mixed use development in place of out-of-town retail, with associated improvements to the urban realm and improved access to the river, albeit there are associated flood risk constraints.

- Bell Green Retail Park is another significant proposal to redevelop **out-of-town retail**, such that loss of 'big box' out-of-town retail can be seen to be a notable element of the proposed spatial strategy. This strategy is in accordance with the findings of the Retail Capacity Study (2019); however, there is a need to apply a degree of caution, given a residual risk of residents needing to travel by car to access similar retail facilities further afield.

Commentary on other policies

- 9.2.3 Policy **SD6** (Improving air quality) directly addresses the need to support the London Plan objectives on air quality and Lewisham's latest Air Quality Management Plan. The policy sets out air quality guidance for new developments, stating that *"New major developments must be at least air quality neutral and all development proposals must demonstrate that they will not lead to further deterioration of existing poor air quality"*. It also has a particular focus on the Borough's six AQMAs and AQFAs.
- 9.2.4 The cluster of 'Transport and Connectivity' policies is primarily focused on improving the Borough's public transport network which is likely to help deliver air quality improvements through a reduction in dependency and usage of cars. Policies **TR3** (Healthy streets as part of healthy neighbourhoods) and **TR4** (Parking) both note direct implications for air quality. In particular TR4 clearly links the contribution that under-provision of parking can make to 'nudging' residents towards modal shift, by seeking *"A carefully managed approach to parking provision recognising ... the strategic objectives ... including by significantly reducing air pollution"*. See further discussion of car parking in Appendix IV.
- 9.2.5 Policy **GR2** (Open space and Lewisham's green grid) supports development proposals involving the reconfiguration of existing open space where there is no detrimental impact on the environmental function of the open space *"including support for nature conservation"*. It is fair to assume that functions in respect of air quality / avoiding air pollution will also be maintained (see further discussion in Appendix IV).
- 9.2.6 Policy **SDF4** (Energy Infrastructure) is also of note. It focuses on a particular source of air pollution from energy infrastructure, noting that the use of CHP or gas boilers must not adversely impact air quality. In practice new CHP is not likely to come forward as it is no longer a low carbon technology in light of the recent rapid decarbonisation of the national grid.
- 9.2.7 Noise and other forms of pollution are primarily addressed by the 'High quality design' policies. For example, Policy **QD7** (Amenity and agent of change) requires that development proposals: *"Minimise and appropriately mitigate disturbances associated with the construction and operation of the development including noise, vibration, odour, fumes, dust, artificial light and site waste"*.
- 9.2.8 Policy **QD8** (Noise and vibration) includes a more specific focus, requiring new developments to consider noise hotspots and stating that: *"new noise and vibration generating development must be appropriately located away from noise sensitive uses"*. It also stipulates that where developments expect to involve a noise/vibration generating use an assessment will be required alongside the development proposal.
- 9.2.9 Policy **QD9** (External lighting) establishes the requirement for development proposals to *"avoid adverse impacts of light pollution"*, whilst policy **QD13** (Outdoor advertisements, digital displays and hoardings) covers the need to consider the visual intrusion of light pollution into neighbouring properties.

Assessment of the plan as a whole

- 9.2.10 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 in respect of indicative densities at BGLS, where masterplanned strategic redevelopment of adjacent sites will assist with reducing car dependency amongst residents of nearby neighbourhoods, and there will be particular opportunities under a BLE Phase 2 scenario; numerous proposed allocations will support walking/cycling, including along the A21 corridor, and/or access to greenspace; the proposed approach to Catford is supportive of the aims of the Catford Town Centre Masterplan, including in respect of improved town centre permeability and realignment of the South Circular; and the proposed approach to Lewisham town centre is also supportive of town centre viability and movement objectives. There are some question-marks regarding proposed densities in the north of the Borough, such that this element of the strategy will warrant scrutiny prior to plan finalisation.

- 9.2.11 With regards to the proposed DM policies, Policy SD6 (Improving air quality) sets stringent requirements on planning applications; however, moving forward, it will be important to ensure that the firm focus of the Local Plan is on avoiding air pollution / air quality impacts, noting that the effectiveness of mitigation measures can often be associated with a degree of uncertainty. The following statement made within the supporting text to Policy SD6 is of note: *“In practice, it may not always be possible to achieve Air Quality Neutral standards or to acceptably minimise impacts using on-site measures alone. If on-site measures are insufficient to make the development acceptable, the AQA should demonstrate that it is possible to include measures in the local area with equivalent air quality benefits. Mitigation measures may be secured either by planning condition or legal agreement...”*
- 9.2.12 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.3 Biodiversity and green infrastructure

Objective: Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.

Commentary on the spatial strategy

- 9.3.1 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). This is a green infrastructure priority area, as identified by the All London Green Grid. Specifically:
- The Waterlink Way – there is a strategic aspiration to: *“Create and promote a connected park system along the Ravensbourne and Pool Rivers re-instating the natural channel, improving habitats, creating an exemplary green transport route including a link southwards towards Bromley, and exploring opportunities for improving health and the local environment.”*
 - South East Green Chain Park – there is a strategic aspiration to: *“Examine the feasibility of developing the South East London Green Chain as a regional park opportunity.”* The Regional Park would follow the southern edge of the borough, taking in land to the east of Lower Sydenham station that skirts the southern edge of Bellingham, linking to Beckenham Place Park and beyond.
- 9.3.2 There are widespread significant opportunities to re-naturalise the river and improve public accessibility, including via delivery of new areas of greenspace along the river corridor. It is difficult to suggest that intensification of uses along the river corridors leads to a tension with biodiversity and green infrastructure objectives, with the plan document notably explaining that:

“The river valley network is a defining feature of the Central Area which development proposals should positively respond to by: Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise; Ensuring the layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them; and Facilitating the provision of new and enhanced connections to and along the rivers and river valleys, including by extending and improving the Waterlink Way. Walking and cycling links to the river from the town centres of Lewisham and Catford, and the A21 corridor, will be strongly supported.”

... The South Area’s network of green infrastructure, including open spaces, will be protected and enhanced, in line with other Local Plan policies. Investment at Beckenham Place Park will continue to be supported to ensure the park is maintained as a high quality open space of regional significance, and a key leisure and visitor destination in London and the wider southeast. Development proposals within the immediate vicinity of the park should provide for enhanced legibility, wayfinding and access to and from its entrances, and be designed having regard to the park’s landscape and historic setting. The council will work with stakeholders to deliver flood alleviation measures at the park, in line with the River Corridor Improvement Plan SPD.”

9.3.3 Under a BLE phase 2 scenario higher growth could well support the aspiration of delivering a regional park, and, regardless, the new community would have very good access to high quality green infrastructure. However, there could potentially be a tension associated with achieving a higher density at the proposed Bell Green Retail Park and Sainsbury's Bell Green sites as the Pool River bounds the eastern extent of these two adjacent sites. From a biodiversity and green infrastructure perspective there will be a strong argument for delivering a significant new area of greenspace here, to buffer the river.

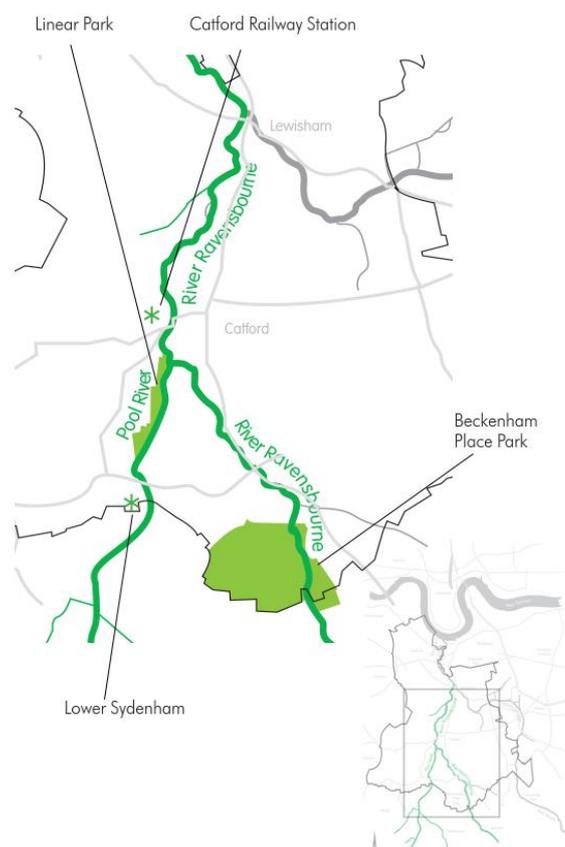
9.3.4 There will also be a need to consider **in-combination issues** and opportunities associated with redevelopment at both Bell Green Retail Park, as the southern extent of the Pool River Linear Park, and two sites at the northern extent, namely Wickes and Halfords, Catford Road and Pool Court (proposed as a gypsy and traveller site; currently comprises a Site of Importance for Nature Conservation, SINC). There could feasibly be an opportunity to extend the park into one or both of the larger development sites, and it is recommended that this option is explored, with a view to an overall biodiversity net gain, as measured/calculated at an appropriate functional scale. Extending the Linear Park would also be in line with open space objectives, noting the key finding of the Lewisham Open Spaces Assessment (2019), which is that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term. However, it is recognised that there is a need to balance wide ranging objectives when considering how best to redevelop these sites. Site specific policy currently states:

- Bell Green Retail Park – *“Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River.”*
- Wickes and Halfords, Catford Road – *“Development should maximise opportunities to enhance the ecological quality and amenity provided by the River Ravensbourne, including by revealing the river through decluverting, repairing gaps in Waterlink Way and improving public access to it.”*

This site specific policy is broadly in accordance with the Site Specific Design and Development Guidelines set for Wickes and Halfords, Catford Road within the adopted River Corridor Improvement Plan SPD (2015). Figure 9.1 shows one of the figures from the SPD, showing the location of the Pool River Linear Park between BGLS and Catford, also highlighting proximity of Beckenham Palace Park.

- Pool Court – the site specific policy does not reference biodiversity constraints or opportunities; however, it explains: *“Applicants should consult with Network Rail and Transport for London on design and development options.”*

Figure 9.1: River corridors in the south / central area



9.3.5 Maintaining a focus on the **central and south sub-areas**:

- Conington Road (which is committed) and Land at Conington Road and Lewisham 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.”*
- Homebase/Argos, Bromley Road is one of two larger proposed allocations in the south sub-area outside of BGLS cluster and is associated with the river valley and associated biodiversity constraint. Site specific policy explains that: *“Development should positively respond to the open and green features on and surrounding the site. The eastern corner of the site includes a pond, designated as a Site of Importance for Nature Conservation. Designated public open space and a Site of Importance for Nature Conservation also exists to the south east of the site...”*
- Beadles Garage is another notable site in the south sub-area. This site is not associated with the river valley, but is associated with a degree of sensitivity nonetheless. Site specific policy explains that: *“Consideration should also be given to creating an enhanced relationship between the site and the designated public open space and SINC immediately to the north of the site whilst respecting its character and context as an historic cemetery with archaeological value.”*

9.3.6 The following bullet points consider the remaining sub-areas in turn:

- **North sub-area** – is also associated with an inherent degree of constraint given the River Ravensbourne, Deptford Creek and the River Thames, although it is important to note that recent developments have been successful in respect of delivering river naturalisation, improved access to the rivers and high quality reconfigured open space. As discussed, the great majority of sites are already committed, but Lower Creekside LSIS is an uncommitted site of note. A key opportunity is to achieve “environmental enhancements to improve the quality of the Creekside area” and the following development requirements are proposed:

“Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including... Waterside access and amenity space, with provision of a new public path along Deptford Creek linking to Waterlink Way.

Development proposals must protect and seek to enhance green infrastructure, including the SINC, the intertidal terrace and the sand martin bank at Deptford Creek.”

- **East sub-area** – site specific policy for Blackheath Hill LSIS explains that: *“Development must conserve and seek to enhance green infrastructure, including the SINC that abuts the site at its south and eastern boundaries.”* Also, Southbrook Mews and Travis Perkins and Citroen Garage are two nearby small proposed allocations in the East sub-area separated by the railway line and the associated embankment, which is designated as a SINC. Site specific policy for both proposed allocations explains that: *“Development must conserve and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment.”*

A further consideration is the potential biodiversity opportunity associated with the redevelopment of Leegate Shopping Centre (which is at the pre-application stage) alongside adjacent smaller sites Sainsbury's Lee Green and Land at Lee High Road and Lee Road, noting 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, which are considerably larger, does not discuss any biodiversity opportunity.

- **West sub-area** – there are several sites / site clusters of note:
 - 111-115 Endwell Road and 2 6 Mantle Road are two nearby small proposed allocations separated by the railway line and the associated embankment, which is designated as a SINC. Site specific policy for both proposed allocations explains that: *“Development proposals must protect and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment.”*
 - Land at Forest Hill Station East is also adjacent to the railway SINC; however, in this case the biodiversity constraint / opportunity associated with the SINC is not referenced in site specific policy. It is recommended that this is reviewed, with a view to ensuring a targeted strategic approach to protecting and enhancing the functioning of the railway SINC.

- Havelock House, Telecom Site and Willow Tree House, near Horniman Drive is a greenfield site with a “mature landscape setting”; however, a lower density scheme is proposed, with site specific policy stating: *“A tree survey will be required to identify healthy, mature trees to be retained within the backland plot. Development should be respectful of the natural landscaping and mature landscape setting and create a public realm space to evoke the feeling of a village green.”*
- Featherstone Lodge, Eliot Bank is a locally listed mid-19th Century house that sits within mature gardens and is located close to listed buildings. Redevelopment of the site, which is now consented, will seek to ‘evoke the felling of a village green’, as per the Havelock House site, discussed above.

Commentary on other policies

- 9.3.7 Policies **GR1 – GR6** directly address the importance of conserving and enhancing green infrastructure and biodiversity across the Borough. Generally, these policies highlight areas of strategic importance which must be protected, as well as opportunities to enhance greening, in particular focused on the South East London Green Chain. The South East London Green Chain is one of the 12 Green Grid Areas set out in the All London Green Grid, which is the supplementary planning guidance of the London Plan which promotes the creation of high quality and multifunctional green infrastructure network across the city to support the development of sustainable communities.
- 9.3.8 Policy **GR1** (Green Infrastructure) sets out the expected multifunctionality of green infrastructure, and requires that “Development proposals will be expected to investigate and maximise opportunities to for enhancing existing green infrastructure and creating new provision on site”.
- 9.3.9 Policies **GR2** (Open spaces and Lewisham’s green grid) and **GR3** (Biodiversity and access to nature) are focused on protecting and enhancing green coverage in the Borough for the benefits of the local population and nature conservation. Policy **GR3** sets out protection and enhancement measures for the Borough’s flora and fauna: *“Nature conservation sites will be safeguarded and protected in order to preserve or enhance priority habitats and species”*. Whilst **GR3** takes a strong stance on the protection of biodiversity it fails to explicitly set out the requirement for new developments to deliver net gain, instead noting: *“They should also seek positive gains for biodiversity wherever possible...”*. Given the Environment Bill’s proposal for mandatory net gain this could be a opportunity missed for the Local Plan to take an even stronger position in support of biodiversity enhancements across the Borough.
- 9.3.10 Policy **GR4** (Urban greening an trees) requires development proposals to demonstrate the target Urban Greening Factor set out in the draft London Plan, illustrating that the Council has considered a tool by which to monitor this. Policy **GR4** notes the biodiversity significance of multifunctional green infrastructure, setting out a requirement for delivering new and enhanced green infrastructure through urban greening across the Borough, importantly noting the potential to utilise this for wildlife corridors; *“by incorporating high quality and species diverse landscaping, wildlife habitat, green roofs and walls”*.
- 9.3.11 Policy **GR5** (Food growing) is also of note. The policy promotes specific local scale open space provision for the benefit of local communities.
- 9.3.12 Further practical application of green infrastructure is provided in the ‘Sustainable design and infrastructure’ group of policies. Policy **SD2** (Sustainable design) sets out a requirement for all development proposals to submit a Sustainable Design Statement which is a tool to demonstrate through the design-led process how proposals will deliver net gains in biodiversity and green infrastructure wherever possible, whilst also providing for safe, healthy and resilient communities.
- 9.3.13 Finally Policies **QD1** (Delivering high quality design in Lewisham), **QD3** (Public realm and connecting places) and **TR3** (Healthy Streets as part of healthy neighbourhoods) all recognise the important role green infrastructure enhancements and urban greening play in delivering public realm that is accessible, attractive and well connected as stated in **QD3** *“Public realm should be sustainability designed and constructed, including by maximising opportunities for urban greening ... having regard to Local Plan Sections 10 (Green infrastructure) and 11 (Sustainable design and infrastructure)”*. Despite not explicitly acknowledging the biodiversity benefits delivered through urban design and greening, this can be inferred by policy **QD3** being read in conjunction with section 10.

Appraisal of the plan as a whole

- 9.3.14 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.
- 9.3.15 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, with policies on Green infrastructure; Open space and Lewisham’s green grid; Biodiversity and access to nature; Urban greening and trees; Food growing and Geodiversity. The following statement, made within the supporting text, relates to a key strategic opportunity: *“New development can help to enhance provision even where it is not feasible to deliver new public open space on site. Through the design-led process proposals should seek to create new routes or improve connections to existing spaces, including through public realm enhancements, particularly in areas of deficiency.”*
- 9.3.16 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

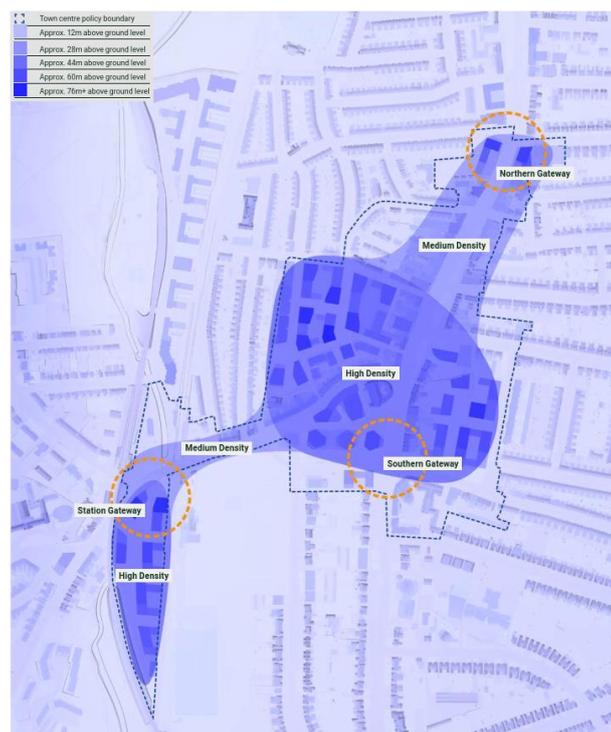
9.4 Climate change adaptation

Objective: Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.

Commentary on the spatial strategy

- 9.4.1 As per the discussion above, under ‘biodiversity’, a primary consideration is the focus of growth, both in respect of the location of proposed allocations and also proposed indicative densities, within the **central and southern sub-areas** of the Borough, recognising that this area is associated with the valley of the River Ravensbourne and its tributary the Pool River (with coalescence at Catford):
- At Catford the key site to consider is Wickes and Halfords, Catford Road, which is located within flood risk zone 3, between the Catford and Catford Bridge railway lines, with the River Ravensbourne cutting diagonally through the north of the site in a covered channel. Residential uses would not be likely at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain. The proposal, as set out in the emerging Catford Town Centre Masterplan (see Figure 9.2), is to support relatively high density development in this area, hence there will a need to give careful consideration (prior to allocation) not only to flood risk avoidance and mitigation, but also safe evacuation and flood response procedures. It is recognised that there are recent precedents of high density residential led development schemes in flood risk zone 3 gaining consent (for example Lewisham Retail Park); however, there is a need to apply caution.

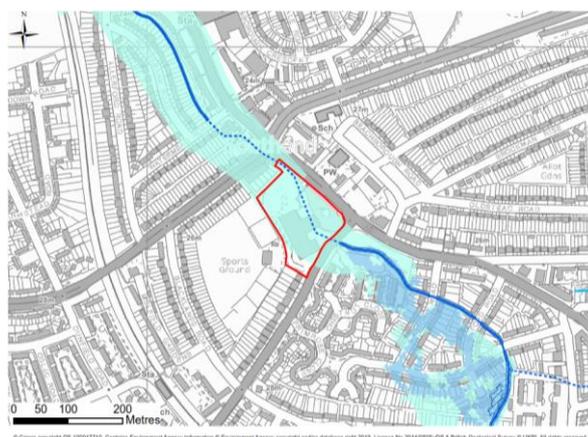
Figure 9.2: Proposed densities in Catford Town Centre



- In the north of the Borough, in Lewisham and along the A21 corridor flood risk zones intersect a number of proposed allocations; however, the great majority either have planning permission or are at the pre-application discussions stage. For example, Silver Road and Axion House is the subject of a current planning application and the Environment Agency has not raised an objection to onsite flood risk in light of the findings of a site-specific Flood Risk Assessment. Indeed, the only entirely non-committed site intersecting flood zone 3 and proposed for residential is Lewisham Shopping Centre. Molesworth Street Car Park is also uncommitted, but is now proposed for employment (i.e. a use that is less sensitivity to flood risk) to reflect the flood risk constraint, having previously been considered for mixed use.
- At BGLS the eastern part of the proposed Bell Green Retail Park site intersects fluvial flood risk zone 2, associated with the adjacent Pool River, and the Worsley Bridge Road Locally Significant Industrial Site skirts flood zone 3 (with the site notably falling between the railway line and the river, in a similar fashion to the Wickes and Halfords site at Catford); however, it is difficult to assume that higher growth scenarios (which is supported by the plan under a scenario that sees phase 2 of the BLE), would lead to increased pressure to deliver homes in (or adjacent to, recalling the need to make allowances for climate change in the long term) the flood risk zone.
- Along the A21 corridor south of Catford the three main proposed allocation - Ravensbourne Retail Park, Land at Randlesdown Road and Bromley Road and Homebase/Argos, Bromley Road – all fall mostly or whole within the fluvial flood risk zone; however, the Level 2 Strategic Flood Risk Assessment (SFRA, 2020) finds that the flood risk zone is 'zone 2', presumably because the river is channelled or culverted (also, it is important to state that Land at Randlesdown Road and Bromley Road is proposed to be redeveloped solely for employment uses, which are suitable in flood zone 2). By way of an example, Figure 9.3 shows the flood risk zone affecting Homebase/Argos, Bromley Road.
- In the east of the Borough, the proposal is to intensify uses at Lee Green district town centre through redevelopment of three adjacent sites, including mixed use redevelopment of an existing retail (Sainsbury's) site. 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.

9.4.2 Aside from flood risk there is a need to consider the effect of the proposed spatial strategy in respect of mitigating the **urban heat island** effect and, more generally, higher temperatures and heat waves. Higher density does lead to tensions in this respect, e.g. on the basis that there can be less space for trees and greenspace, and on the basis that tall buildings require air conditioning to counter solar gain; however, as discussed above, the Council's approach to development density is carefully considered.

Figure 9.3: Flood risk zone 2 (light blue) and 3 (dark blue) in the vicinity of Homebase/Argos, Bromley Road



- 9.4.3 Further considerations relate to the extent to which the spatial strategy supports delivery of new and enhanced greenspaces and green infrastructure more generally; however, these matters have already been discussed above, under the 'biodiversity and green infrastructure' heading.

Commentary on other policies

- 9.4.4 Policy **SD1** (Responding to the climate emergency) notes Lewisham takes “a strategic and coordinated approach will be taken to ensure that the Borough ... is made more resilient to its environmental, social and economic impacts.” The policy makes reference to supporting regional and national action to address global climate change whilst understanding that locally specific responses are urgently needed.
- 9.4.5 Policy **SD7** (Reducing flood risk) requires that: “all new development does not increase flood risk in the Borough, reduces the risk of flooding from all sources and is designed to remain safe and operational under flood conditions”. The policy also requires any new developments to undertake flood risk assessments providing sufficient evidence to “Make an appropriate allowance for the hazard posed by climate change over the lifetime of the development, informed by the latest Government guidance”.
- 9.4.6 Policy **SD8** (Sustainable drainage) recognises the need to tackle surface water flooding which “is becoming an increasing issue in London due to continued urban development (increased impermeable area) and climate change (greater rainfall intensity).” The policy goes on to note that SuDs should function effectively over the lifetime of the development, again highlighting the need to embed resilience to potential changes in flood risk over time. Policy **SD9** (Water management) builds on this noting that the Borough’s waterways have a critical role in developing resilient communities to climate change.
- 9.4.7 Policies **GR1** and **GR4** note the important role green infrastructure and urban greening can have in managing flood risk; however, there could be potential to more strongly link the requirements of these policies with the London Plan Drainage Hierarchy and to more clearly identify the potential benefits of reading these policies in conjunction with policy **SD8** when considering flood risk.
- 9.4.8 The other key facet of climate change adaptation is developing resilience to the urban heat island effect. Policy **SD5** (Managing heat risk) is focused on this, and should be read in conjunction with Policy **GR4** (urban greening and trees) as urban greening measures have a significant cooling effect. In addition policy **SD5** notes that new developments should reduce reliance on air conditioning systems and follow the London Plan’s cooling hierarchy, to ensure adaptation measures do not increase energy use.

Appraisal of the plan as a whole

- 9.4.9 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 of sites that currently comprise non-vulnerable uses – namely commercial and industrial land – warrants further scrutiny, from a flood risk perspective. There will be very good potential to avoid and mitigate flood risk within development sites, including by Sustainable Drainage Systems and ensuring less vulnerable uses on the ground floor; however, at this stage in the plan-making process a degree of concern remains.

- 9.4.10 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 further work prior to plan finalisation. Supporting text explains that: *“Where the Sequential and Exception Tests are satisfied we will seek that proposals fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through site layout and development design. This includes appropriate measures to ensure development is safe. Proposals should fully assess and address residual risk, including through flood resistant design... and resilient design (e.g. to ensure the building’s structural integrity is maintained and that drying and cleaning can be facilitated).”*
- 9.4.11 In conclusion, **moderate negative effects** are predicted although there is considerable uncertainty.

9.5 Climate change mitigation

Objective: Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).

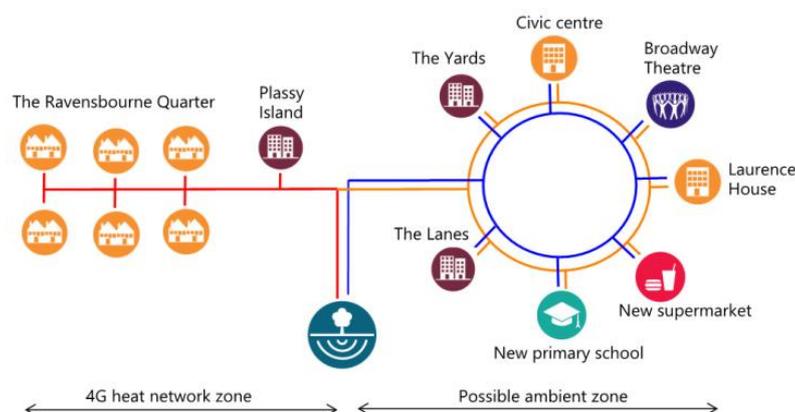
Commentary on the spatial strategy

- 9.5.1 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.
- 9.5.2 In this respect a primary consideration is the need to support delivery of **heat networks** and maximise the number of homes that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of small scale and micro power generation, e.g. solar panels). Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means:
- Proximity to a strategic heat source, which can be waste heat from an existing²² CHP plant, industry or waste management, or ambient heat from the ground, water or air, given heat pump technologies;
 - Proximity to a major source of heat demand (also cooling), such as a civic building; and
 - Support for strategic-scale mixed use schemes that achieve economies of scale and lead to a balanced heat demand profile.
- 9.5.3 Heat network opportunities have recently been explored in detail through the Lewisham Energy Masterplan discusses several priority areas:
- North Deptford – this is the area within the Borough associated the greatest locational opportunity given the South East London Combined Heat and Power (SELCHP; powered by waste incineration). Most sites are now committed or near committed (including the three stand-out large sites), such that the opportunity to explore heat network options may now be limited; however, the three smaller uncommitted sites could, in combination, potentially support a connection to the SELCHP. One of these sites (SIL at Apollo Business Centre) is in close proximity to the SELCHP, hence site specific policy states: *“Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.”* The other two uncommitted sites are further east (in the direction of Convoys Wharf); however, there may nonetheless be an opportunity, recognising that the Energy Masterplan explains: *“SELCHP have funding to extend the network to the Convoys Wharf development this year.”*
 - Deptford - all bar two (Albany Theatre and Deptford Creek LSIS) of the proposed allocations are committed or near committed, such that there may now be limited opportunity to explore heat network options; however, it is recommended that options should be explored nonetheless. A range of strategic heat sources might feasibly be explored (e.g. industry, Deptford Creek); however, The Energy Masterplan states: *“Further feasibility and early engagement is recommended with Veolia [the operators of SELCHP] to discuss the connection [to Convoys Wharf] and ensure that the network is futureproofed for extension to the Deptford area before installation (if further feasibility work proves it to be viable).”*

²² It is increasingly understood that new CHP should not be supported, as decarbonisation of the electricity grid means that gas fuelled CHP can no longer be considered a low carbon solution.

- New Cross area – the Energy Masterplan explains: “*The New Cross and Bermondsey clusters also presented a good opportunity for heat network development. However, after discussions with LBL, it was decided to not explore these opportunities further as they are already being pursued by SELCHP and other parallel heating studies.*” This is an important opportunity area, as the two sites adjacent to New Cross Gate station remain uncommitted will together deliver over 1,000 homes, as well as new employment floorspace and town centre uses, and it is recommended that this should be examined further, including through the emerging Area Framework .
- Lewisham – the Energy Masterplan finds there to be a considerable opportunity: “*The redevelopment of the shopping centre, if realised, provides a catalyst to develop a future electrified heat network that will decarbonise and extend the existing networks in the area [which currently draw from CHP, which is no longer a low carbon technology in light of decarbonisation of the national grid]. Early engagement with the shopping centre is recommended to ensure this is captured within the masterplan. Heat supply opportunities include heat pumps (air source or the river) as well as heat recovery from cooling systems at the commercial areas and the Riverdale data centre.*” Site specific policy for Lewisham Shopping Centre does not currently discuss the heat network opportunity, potentially on the basis that Borough-wide Policy SD4 (Energy infrastructure) is judged to provide sufficient detail; however, it is recommended that site specific issues and opportunities should be explored and reflected in site specific policy. The possibility of using the rivers (Ravensbourne and Quaggy) as a strategic heat source might be explored.
- Catford – the proposal is to follow a masterplan-led approach to assigning indicative development densities. It could well be that this strategy is supportive of delivering one or more heat networks, and the Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstons College Jubilee Grounds. Again, it is recommended that strategic issues (e.g. heritage constraints) and opportunities are fed through into area and/or site-specific policy. Figure 9.4 is a schematic, taken from the Energy Masterplan, that serves to highlight the importance of early planning in order to capitalise on heat network opportunities.

Figure 9.4: Heat network opportunities in Catford



- 9.5.4 With regards to Bell Green / Lower Sydenham, this is not a focus of the Energy Masterplan; however, there may nonetheless be a strategic heat network opportunity. The proposal is for comprehensive redevelopment within this area, particularly at the three adjacent Bell Green sites, which together would deliver in excess of 1,000 homes under a no BLE scenario (with the standard methodology used to assign indicative densities). This is a relatively unconstrained area, e.g. in comparison to Catford, hence there will be very good potential to deliver a heat network. The potential will be greatly enhanced under a BLE phase 2 scenario, as there will be the potential to deliver homes at much higher densities, and there will also be the potential to deliver a greater mix of uses, including as part of a new town centre. There could feasibly be an opportunity associated with linking a heat network to the SIL to the south, which falls within London Borough of Bromley, and the use of the adjacent river as a strategic heat source could be explored.

9.5.5 Aside from supporting heat networks, there is also a need to consider whether the spatial strategy is supportive of delivering standards of **sustainable design and construction** in exceedance of building regulations, notably in respect of minimising need for heating and air conditioning. However, it is difficult to draw strong conclusions. As has been discussed, the proposed approach to density is carefully considered, as opposed to an approach that can be described in generalised terms and, in any case, it is difficult to identify a strong correlation between density and sustainable design and construction in the London context. There can be a need for air conditioning to avoid summer overheating, making achievement ‘be lean’ targets challenging; and roof space for solar PV (‘be green’) will invariably be very limited. There can also be design challenges in respect of building level air source heat pump solutions (‘be green’), given the need to avoid visual and noise issues. However, on the other hand, tall buildings amount to high density development that can be supportive of district-level heat network delivery, and there are not known to be any particular challenges in respect of delivering heat network piping within tall buildings (see Figure 9.5). It is also fair to highlight that tall buildings will be major schemes where the developer will be expected to apply careful approaches to modelling emissions and potentially will fund ongoing monitoring of emissions of time (‘be seen’).

Figure 9.5: Ground source heat network case study²³

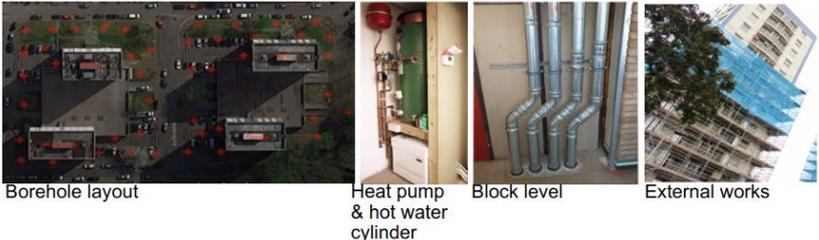
2.3.1 Enfield, London

Typology	Decarbonisation Measures	Decarbonisation Strategy
High-rise Flats	Ground Source Heat Pump (GSHP)	400 flats over 8 tower blocks in Enfield, were retrofitted using a shared ground loop array ground source heat pump system with individual heat pumps in each dwelling

Enfield Council own freehold of the tower blocks, with a number of private leaseholders. In 2017 Engie were appointed to deliver this scheme in partnership with Kensa Contracting. 16 boreholes serve the eight blocks with an individual 3kW Kensa Shoebox GSHP and hot water cylinder installed in each flat (see Figure 2.3). The project also included external wall insulation in two of the blocks, identified through thermal imaging surveys.

The scheme will deliver an expected 30-50% saving on residents heating bills compared to the electric heating previously installed. Funding was secured through ECO and RHI.

This solution is potentially well suited to purpose-built flats with electric heating. Lewisham Council own a number of blocks where this solution may be applicable, with an approximately 7,000 homes in the borough currently using storage heaters.



Borehole layout Heat pump & hot water cylinder Block level External works

Commentary on other policies

9.5.6 Policy **SD1** (Responding to the climate emergency) commits to: “A plan, manage and monitor process will be used to support the successful transition to a net zero-carbon Borough.” The supporting text then goes on to explain: “The Local Plan will play an important role in helping the Borough respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaption in respect of the future use and management of land within Lewisham. It also sets out policies to ensure that new development is designed, constructed and operated in a sustainable way.” It is recommended that further detailed consideration is given to clarifying those climate change mitigation opportunities to be explored, and potentially realised, through proactive measures in the Local Plan (primarily around spatial strategy and site specific policy), versus those that can reasonably be left to the planning application process. This is a particular consideration in respect of heat networks, where understanding of best practice in the London context is evolving quite rapidly. In particular, there is increased recognition that gas fuelled combined heat and power (CHP) source heat networks are no longer a low carbon option, and that attention should not focus overly at on large scale heat networks (‘district heating’) at the expense of smaller scale (including ‘on plot’) schemes. Whilst larger scale schemes can be effective, there are major design and delivery challenges, and new heat pump and heat network technologies and methods mean that smaller scale scheme can be effective.

²³ Sourced from Lewisham Energy Masterplan (Borough-wide Decarbonisation), Buro Happold (2020)

- 9.5.7 Policy **SD3** (Minimising greenhouse gas emissions) focuses on reducing emissions from new development proposals through their operational stages and minimising energy demand in accordance with the London Plan's energy hierarchy, in order to drive down per capital GHG emissions. Much work is ongoing at the London-scale to understand how to set policy for each tier of the energy hierarchy. One increasing focus is on embodied emissions, i.e. non-operational greenhouse gas emissions associated with a building's lifecycle, covering: A) the emissions that have already occurred at the time a building is completed; and B) other 'locked in' non-operational emissions associated with subsequent stages of the building lifecycle (maintenance, repair, retrofitting, demolition and disposal). It is estimated that of the global cumulative CO₂ emissions associated with new development that will occur between now and 2050, around half will result from the embodied emissions that have occurred prior to operation. Another increasing focus is on offsetting residual emissions – see detailed discussion in Appendix IV.
- 9.5.8 Policy **SD4** (Energy infrastructure) is a key policy from a perspective of wishing to make the most of heat network opportunities. The policy broadly reflects the hierarchy approach set out in Policy SI3 of the Intend to Publish London Plan, highlighting CHP as performing relatively poorly as a technology, relative to heat networks drawing on secondary or zero carbon heat sources. It is recommended that policy support for CHP is closely scrutinised head of plan finalisation, as decarbonisation of the national grid now calls into question CHP as a low carbon technology. Steps should be taken to ensure that the Local Plan makes the most of the heat network opportunities discussed within the Energy Masterplan (2020), and there is also a need to keep understanding of best practice in the London context under close review.
- 9.5.9 Transport is also a significant contributor to the UK's greenhouse gas emissions. Transport is a focus of stand-alone discussion below, but in brief: Policy **TR1**(Sustainable transport and movement) seeks to promote active modes of travel and optimise connectivity and accessibility to public transport, in support of the London Plan's target of 80% of journeys to be made by public and active modes of transport; and Policy **TR4** (Parking) seeks to support the transition to less carbon intensive transport mix through reducing parking provisions, and also support the delivery of low emission vehicle charging infrastructure.

Appraisal of the plan as a whole

- 9.5.10 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 proposed strategic masterplanned redevelopment at BGLS as representing a clear opportunity, and there are also significant opportunities at Lewisham, Catford and in the north of the Borough that should be capitalised upon through the Local Plan. An Energy Masterplan has recently been completed, and it will be important to ensure its findings feed into plan finalisation.
- 9.5.11 With regards to the proposed DM policies, the plan notably includes policies on: Responding to the climate emergency; Sustainable design; Minimising greenhouse gas emissions; and Energy infrastructure. With regards to energy networks, there is a requirement that all proposals for major residential and commercial development will be expected to submit a feasibility assessment to *“fully evaluate connecting to an existing or planned future heat network where it is located on or in proximity to the site”*; however, there is a need to recall that opportunities will largely be dictated by spatial strategy in practice. With regards to sustainable design and construction, a range of stringent requirements are proposed, including in respect of achieving nationally recognised standards (Home Quality Mark, BREEAM) 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 context (a consultation on “The Future Homes Standard” for all new homes nationally closed in October 2019) and development viability considerations.
- 9.5.12 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.
- N.B. with regards to effect significance, one hand there is a need to recognise the urgency of supporting major interventions in support of climate change mitigation, as reflected in the Borough's declaration of a Climate Emergency; however, on the other hand, climate change mitigation is a global issue such that local actions can only ever have a limited impact / significance.

9.6 Communities (accessibility)

Objective: Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.

Commentary on the spatial strategy

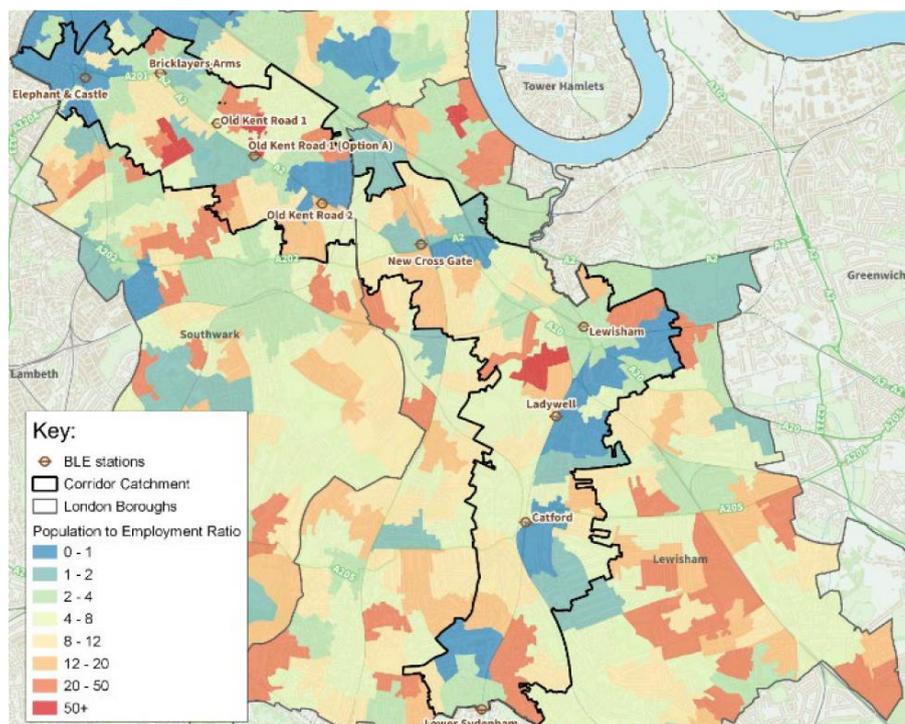
- 9.6.1 The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration, where relative deprivation is closely linked to accessibility, with the Local Plan explaining:

“The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of development sites.”

- 9.6.2 Having made this initial commentary on the spatial strategy, the following bullet points give consideration to select detailed aspects:

- **Lewisham** - a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme (450 dph, reflecting PTAL) that will ensure a net gain in main town centre uses (currently nearly 45,000 m²), recalling that the proposal is to re-provide main town centre uses within this location such that these uses comprise 33% of the total floorspace of the redevelopment scheme (see para 5.3.15, above).
- **Catford** – the proposal is to take a masterplanning approach to assigning indicative residential densities to the four sites that fall within the Catford Town Centre Masterplan Area, on the basis that this will be supportive of wide ranging regeneration objectives for the town centre. This approach is supported, recognising that the town centre and surrounds are associated with a notable concentration of relative deprivation; however, there is a need to apply a degree of caution, mindful of “civic and cultural heart of the Borough” role that Catford plays in the settlement hierarchy, complimentary to the role of Lewisham. The emerging Catford Masterplan presents a vision for Catford, as part of which the town centre is described as follows: *“As well as an established community with a strong sense of identity, in recent years Catford town centre has expanded its offer and appeal to a broader group of people. It has an informality that is a draw and a comfort for many.”*
- **Bell Green / Lower Sydenham** – falls within the defined Strategic Area of Regeneration, hence there is support for the proposed comprehensive redevelopment of this area, which should bring with it community infrastructure upgrades and new employment opportunities. In particular, in respect of a higher growth / BLE Phase 2 scenario, the BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a ‘dramatic rise’ in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and-above those envisaged by the LEIA. It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA – see Figure 9.6 – with this wider ‘hinterland’ being associated with a notably high population to employment ratio, amongst other indicators of relative deprivation. Higher density development could bring with it a new town centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which could form part of a new Regional Park) a short distance to the south.

Figure 9.6: Areas of high population to employment ratio and BLE 1km buffer



- 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 should contribute to securing the long-term vitality and viability of Lee Green district town centre by enhancing the place qualities of the centre, as well as reinforcing its role as a key focal point for community activity in the East Area. Development proposals must contribute to a coordinated process of town centre renewal that positively responds to the area’s distinctive character. They should also deliver a complementary mix of uses, including new housing, whilst ensuring that the centre’s predominant commercial and community role is maintained and enhanced.”* It will be important to ensure that the sites are masterplanned as a whole as far as possible, albeit this may be a challenge given the current application for Leegate Shopping Centre.
- Finally, it is important to note that there are clusters of proposed allocations at other district and local centres, namely **Brockley**, **Forest Hill** and **Sydenham** in the west of the Borough, and **Grove Park** in the east, with the proposed strategy for Grove Park local centre of particular note.

Grove Park local centre serves both Grove Park to the east and Downham to the west. Downham falls within the Strategic Area of Regeneration and Grove Park is also associated with certain issue, with the Local Plan explaining: *“Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular...”* The proposed allocation, which is known as “Sainsbury Local and West of Grove Park Station” comprises of a number of sites located within Grove Park local centre, which are currently occupied by a range of main town centre uses along with a petrol station, bus station and housing. An ambitious approach is proposed in respect of assembling sites in order to deliver a comprehensive (albeit small scale; net 78 homes) redevelopment to support the long-term vitality and viability of the local centre – see Figure 9.7.

Figure 9.7: Proposed allocation at Grove Park



9.6.3 Finally, there is a need to consider the implications of mixed use redevelopment of sites that currently comprise a community use (outside of a town centre). The following sites are of note:

- Sydenham Green Group Practice comprises an existing large health centre adjacent to the proposed BGLS strategic growth area; 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.
- Jenner Health Centre, in the west of the Borough, does not fall within a strategic growth area, hence there is less to be gained by redevelopment, relative to the Sydenham Green Group Practice site; however, it is again fair to assume that health infrastructure will be sufficiently re-provided as part of the redevelopment, hence there are limited concerns and, indeed, potentially no concerns beyond short term impacts during the construction phase.
- Riverside Youth Club and 2000 Community Centre, in the north of the Borough, with site specific policy requiring: *“The operational requirements of the retail and community/leisure uses across the site should be taken into account.”*
- Catford Policy Station - there are no concerns in this regard, as it is certainly fair to assume that policy operational capacity will not be unduly impacted by allocation and redevelopment of the site (and this is a stated requirement within site-specific policy).

9.6.4 Also, there is a need to note the strategy in respect of mixed use redevelopment of out-of-centre retail facilities, notably Ravensbourne Retail Park, Bell Green Retail Park, Homebase/Argos Bromley Road and Bestway Cash and Carry. Whilst recognising there is a need for additional retail floorspace in the Borough over the plan period, Lewisham’s Retail Capacity Study Update (2019) identifies that this capacity can be accommodated within the existing town centre network, particularly at Lewisham and Catford centres, and forecasts a future reduction in the need for out-of-centre retail floorspace. Having said this, it is worth noting that redevelopment of existing out-of-centre retail areas will tend to be for mixed use schemes that include re-provision of retail, particularly at BGLS.

9.6.5 Other commercial uses are also set to be lost, including car servicing and builder’s merchants, and several car parks are proposed for redevelopment. In the great majority of cases there is a clear strategic argument for redevelopment that extends well beyond simply housing delivery.

Commentary on other policies

9.6.6 The set of ‘Community Infrastructure’ policies seek to protect existing and provide new infrastructure, e.g.

- Policy **CI1** (Safeguarding and securing community infrastructure) sets out Lewisham’s approach to identifying current and future requirements, including for healthcare, education, recreation and other community services. It notes that *“new development will be supported where it safeguards and enhances community infrastructure”* and *“major developments may be required to deliver community infrastructure on sites”*.

- Policy **CI2** (New and enhanced community infrastructure) sets out detailed requirements for how proposals should consider improving existing facilities, including access, saying proposals should ensure *“the site and building is appropriately located for the intended use and is easily accessible by public transport, walking and cycling”*. It importantly notes that the facility should not restrict access to the wider community; this is an important consideration to help facilitate growing populations and support community cohesion.
- 9.6.7 Policies **CR3** (Play and informal recreation) and **CR4** (Nurseries and childcare facilities) seek to ensure the accessibility of play/informal space and nursey facilities. Policy **CR3** maps out play space deficiency across the Borough and says that in response to this, *“new developments will be expected to incorporate well-designed and high-quality formal play provision of at least 10 square metres per child”*. Policy **CI4** focuses on ease of accessibility to nurseries and childcare facilities.
- 9.6.8 Numerous policies within the ‘High quality design’ section of the plan seek to ensure high quality public and private space. Notably:
- Policy **QD1** (Delivering high quality design in Lewisham) includes a sub-section entitled *“Places for People”*, which notes that new proposals must be designed to ensure *“buildings and spaces are welcoming, inclusive, safe and accessible for all”*.
 - Policy **QD2** (Inclusive and safe design) states that *“Development proposals must positively respond to the diversity and varied needs of Lewisham’s population...”* This emphasises the need for buildings and spaces to be accessible to all members of the public, including those that can face access barriers.
 - Policy **QD3** (Public realm and connecting places) states that public realm should maximise opportunities to improve connections to existing or proposed community infrastructure and where appropriate make provisions for infrastructure such as water fountains, public convivences, shading and public art.
 - Policy **QD6** (Optimising site capacity) directly address the need for new infrastructure to support growth, saying that proposals should have regard for the *“capacity of infrastructure (including physical, environmental and social infrastructure) to support the density proposed having regard for individual and cumulative impacts of development”*. The policy goes on to state that the optimum density of a site must be informed by the existing and planned infrastructure that are required for well-functioning communities, taking into consideration the local context and the demands proposals create.

Appraisal of the plan as a whole

- 9.6.9 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 emerging 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 (which is the focus of the BLE Local Economic Impact Assessment, 2020); and the proposed clustering of proposed allocations and district and local centres is strongly supported, perhaps most notably in respect of Lee Green and Grove Park. Potential tensions are highlighted in respect of loss of existing uses, particularly outside of town centres, but these concerns are limited (in particular, site specific policy for both of the proposed allocations that currently comprise a health centre is clear that health uses should be re-provided onsite).
- 9.6.10 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.
- 9.6.11 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.

9.7 Communities (housing)

Objective: Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.

Commentary on the spatial strategy

- 9.7.1 The proposed strategy identifies sufficient sites with capacity, when combined with traditional windfall delivery rates, to comfortably exceed the London Plan housing target (1,667 homes per annum over the period 2019 to 2029) and 'close the gap' considerably with LHN (currently understood to be 1,939 homes per annum, but potentially higher), with delivery of around 1,903 homes per annum in the first 15 years of the plan period (an important consideration in light of paragraph 15 of the NPPF, which states: "*Strategic policies should look ahead over a minimum 15 year period from adoption*"). Additional supply for the final five years of the plan period could then be identified through a Local Plan Review.
- 9.7.2 There is also support for the proposal to deliver higher density schemes at BGLS under a BLE Phase 2 scenario, although there is more uncertainty regarding the timeline ('trajectory') of housing delivery, because growth might need to be delayed or phased to coincide with delivery of the BLE.
- 9.7.3 The spatial strategy does also potentially have implications for other 'housing' related matters; however, these are considered to be of secondary importance, relative to the matter of total housing quantum. One important consideration is that which is a focus of the BLE LEIA (2020), namely that under BLE scenarios house prices locally will increase in the vicinity of BLE stations, thereby leading to more residents in need of **affordable housing**, which, in turn, suggests a need to support a higher housing growth strategy locally. The LEIA identifies a particular issue in Catford, stating: "*Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing.*"
- 9.7.4 Provision for **specialist housing** needs is another consideration, although this is a focus of only one of the proposed allocations, namely Featherstone Lodge, Eliot Bank, which is proposed for older person's accommodation. Other specialist housing needs are dealt with through development management policy (see discussion below), but there will be a need for further work ahead of plan finalisation to confirm that there is not a need for the Local Plan to take a more proactive approach through site allocation.
- 9.7.5 Finally, there is a need to consider the proposed strategy in respect of meeting **gypsy and traveller accommodation needs**. The background is as follows:
- The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for six pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation. Having regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies. A Preferred Site Consultation was then over six weeks in 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed.
- 9.7.6 In light of the above, the Draft Local Plan proposes an allocation at Pool Court, which 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. A related constraint is the on-site local nature conservation (SINC) designation, and it is important to consider the biodiversity value of this site not only isolation, but as one element of the ecological network associated with the Ravensbourne and Pool river valleys (see discussion of the Wickes and Halfords site above, under 'Biodiversity'). 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; the council should also continue to explore other opportunities to meet the housing needs of this group.

Commentary on other policies

- 9.7.7 Section 7 of the Local Plan is focused on Housing, with 11 policies proposed.
- 9.7.8 Beginning with Policy **HO1** (Meeting Lewisham's housing needs), this policy sets out the strategic approach to ensuring: *"The draft London Plan minimum ten-year target of 16,670 net housing completion over the period 2020 to 2030 (or 1,667 net completions per year) is met and exceeded"*. The policy acknowledges this requires an increase in the delivery of new development and sets out Lewisham's approach to increasing the rate of delivery of housing.
- 9.7.9 Policy **HO2** (Optimising the use of small housing sites) is also of central importance. The aim is to boost the delivery of small housing development beyond the historic delivery levels, in light of the NPPF emphasis on diversifying the supply of sites and the ambitious approach proposed by the draft London Plan (2017). Small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, has a distinctive character and urban grain based on its historic estate development. There is a lack of large site opportunities to generate investment in this area, owing mainly to its distinctive 'garden city' character. Small site development provides a mechanism for more incremental investment and real improvement that can help to address the underlying causes of deprivation.
- 9.7.10 Delivery of genuinely affordable housing is a clear corporate priority for the Borough Council, and this is reflected in the Policy **HO3**, with the following being a key statement made within the supporting text:
- "The Local Plan sets a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. The strategic target is considered to be in line with the draft London Plan. However, recognising the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population, a local definition of 'genuinely affordable housing' is necessary. In Lewisham, this means housing at social rent levels or GLA's London Affordable Rent level and below, aiming for target rents. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing."*
- 9.7.11 Further detailed discussion of affordable housing policy is set out in Appendix IV, particularly exploring the question of whether the Local Plan should: A) set a target of 50% of all new homes built to be 'genuinely affordable', which is defined as housing at social rent levels (which is set on the basis of local income levels), meaning that that intermediate and market housing products would not be considered as genuinely affordable; or B) use the standard definition for affordable housing, as set out at Policy H6 of the Intend to Publish version of the new London Plan (2019), which includes intermediate products. The conclusion reached is that there is clear support for (A) on the basis of the SHMA recommendations; however, there is a 'question-mark' in respect of economic objectives, as additional support for intermediate housing products could potentially serve to ensure a wide range of housing products are available, which would be particularly beneficial in terms of attracting and retaining skilled workers within the Borough, including skilled workers within priority industries.
- 9.7.12 Finally, in respect of affordable housing, it is noted that the proposal is to set out a threshold approach to viability. The threshold approach allows proposals to be fast tracked past the detailed viability stage if they meet the threshold; this policy approach should encourage developers to deliver the Borough's affordable targets. Moving forward, it will be important to consider the viability of achieving affordable housing objectives alongside other objectives, e.g. in respect of climate change mitigation.
- 9.7.13 Policy **HO4** (Housing estate maintenance, renewal and regeneration) seeks to ensure that estate regeneration schemes do not result in a loss of affordable housing and where possible delivers an uplift in genuinely affordable housing. The policy also sets out a design standard which estate regeneration must meet, requiring that *"development is designed to a high-quality standard and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies"*. Large scale estate regeneration is more likely to occur in more deprived areas, therefore, this policy approach could contribute to delivery of improved quality living environments in some of the more deprived areas in the Borough.
- 9.7.14 Policy **HO5** (High quality housing design) sets out the key principles to deliver high quality residential amenity and living standards, providing guidance on room sizes, outside amenity space, exposure to pollution, microclimate management and outlook for occupiers, amongst other requirements.

- 9.7.15 Policies **HO6** (Accommodation for older people), **HO7** (Supported accommodation), **HO8** (Purpose built student accommodation), **HO9** (Housing with shared facilities [Houses in Multiple Occupation]), **H10** (Self-build and custom-build housing) and **HO11** (Gypsy and traveller accommodation) all focus on different areas of specialist housing need. For example, policy **HO6** acknowledges the growing pressure of delivering housing infrastructure for older people, noting the need to match supply for the over 65 population which is estimated to rise by 50% by 2033. All of these policies note that specialist housing should be accessible and benefit from good provisions of social and physical infrastructure.
- 9.7.16 Policies **QD1**, **QD2**, **QD3** and **QD6** all contribute to setting design guidelines for proposals to ensure high quality living environments; from open and green space, to public realm and amenity space. For example, Policy **QD1** has a sub section entitled “*Delivering high quality development*” which sets out the process and policy documents that developments should follow to deliver high quality developments.

Appraisal of the plan as a whole

- 9.7.17 The proposed strategy will comfortably exceed the London Plan housing target (1,667 homes per annum over the period 2019 to 2029) and would close the gap considerably with LHN (currently understood to be 1,939 homes per annum, but potentially higher), with delivery of around 1,903 homes per annum in the first 15 years of the plan period (an important consideration in light of paragraph 15 of the NPPF, which states: “Strategic policies should look ahead over a minimum 15 year period from adoption”). Additional supply for the final five years of the plan period could then be identified through a Local Plan Review. There is also support for the proposal to deliver higher density schemes at BGLS under a BLE Phase 2 scenario, although there is more uncertainty regarding the timeline (‘trajectory’) of housing delivery, because growth might need to be delayed or phased to coincide with delivery of the BLE. Further considerations relate to provision for specialist housing needs, with one allocation proposed for older persons accommodation, and gypsy and traveller accommodation, with one allocation proposed.
- 9.7.18 With regards to the proposed DM policies, the Draft Local Plan includes a section dedicated to Housing, comprising eleven separate policies covering topics including: Genuinely affordable housing; Housing estate maintenance, renewal and regeneration; High quality housing design; Accommodation for older people; Supported accommodation; Purpose built student accommodation; Housing with shared facilities (Houses in Multiple Occupation); and Gypsy and traveller accommodation. 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 per cent of all new homes delivered in the Borough to be genuinely affordable, as well as a local definition of ‘genuinely affordable housing’.
- 9.7.19 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.8 Communities (wider issues)

Objective: Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.

Commentary on the spatial strategy

- 9.8.1 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. Issues are particularly acute within the Strategic Area of Regeneration (SAR), which has the potential to benefit from growth targeted at Bell Green / Lower Sydenham, particularly under a BLE Phase 2 scenario, under which the Local Plan is supportive of a higher growth strategy. The BLE LEIA (2020) is supportive of the BLE to Lower Sydenham, including because the area “*has seen the largest increase in the number of claimants in the Corridor by a significant margin - a 21% increase in claimants is over 5 times the Corridor average*”, and it is fair to suggest that benefits would A) extend beyond the immediate station environs (the area which is the focus of the LEIA) and B) would be enhanced under a higher growth scenario. Specifically, a higher growth scenario could support some or all of the following SAR priorities discussed within the Draft Plan:

- “Enhancing provision of and access to high quality public transport infrastructure, including bus services;
- Addressing barriers to movement by enhancing the network of pedestrian and cycle routes connecting to transport nodes, town and local centres, schools and training facilities, and employment locations;
- Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people;
- Support the vitality and viability of town and local centres, helping to ensure they make provision for a wide range of accessible shops and services;
- Improve the environmental quality of neighbourhoods, including by reducing and mitigating pollution along main roads and junctions.”

- 9.8.2 Access to high quality community infrastructure is critical and has been discussed above under the **‘Accessibility’** heading, as has the related matter of improving access to transport infrastructure and improving the quality and permeability of the urban realm. Another closely related matter is access to green infrastructure, which has been discussed above under **‘Biodiversity and green infrastructure’**. Under both headings there has been a discussion of issues and opportunities associated with the defined Strategic Area of Regeneration in the Southeast of the Borough,
- 9.8.3 Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the **‘Housing’** heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.²⁴ Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.
- 9.8.4 **Air and noise pollution** is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, and in particular air and noise pollution, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects.²⁵ Addressing the quality of the urban realm in Catford and Lewisham, and also along the A21 corridor, is a focus of discussion above, including in respect of access to rivers and open space.
- 9.8.5 Further key considerations relate to the **Economy**, as discussed below. One key consideration is avoiding loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being “*characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.*”
- 9.8.6 The proposed regeneration of **Catford town centre** warrants a particular focus, given that the scale of change will have significant implications for existing communities and businesses in the area, which the emerging Masterplan describes as being associated with “*an established community with a strong sense of identity*” and an “*informality that is a draw and a comfort for many.*” Elements of the proposed Masterplan include:

²⁴ See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

²⁵ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

- Overall strategy – there is certainly a need for regeneration, given a range of specific issues, notably: the dominance of the South Circular/Catford Road and surrounding road network, which has a major impact on environmental quality and the cohesiveness of the town centre; a poor sense of arrival into the town centre; a shopping mall that is hidden and inward-looking and provides a limited retail offer; Milford Towers that are in a poor state of repair; and a dispersed and poorly linked set of Council offices that would benefit from being reconfigured and consolidated. The broad proposal to deliver a new cultural and civic hub and surrounding retail area – see Figure 9.8 – is also supported, as are ambition statements including: *“The ambition is to reinforce Catford’s point of difference as a cultural destination and to improve and diversify the leisure offer and the night-time economy...”* However, there is potentially a need for further work to understand the nature of existing communities and businesses, and how they will be able to adapt and thrive during and following the regeneration.
- The Yards – this area is described as hosting “an eclectic mix of buildings from different eras”, which could, in turn, suggest that this area is associated with community and business diversity, although it is recognised that the overall conclusion reached by the Masterplan is that: *“The area as a whole is underutilised and underdeveloped”*. The objective for the area is *“to become a creative and entrepreneurial cluster for Catford’s existing and future independent businesses, providing a range of spaces with a street presence”* and the proposal to deliver *“external yard spaces [that are hard working and durable, and function as open air workshops for construction, creation and recreation”*. This is supported, from an equalities perspective; however, it is recommended that further consideration is given to avoiding and mitigating impacts to existing communities and businesses.
- The Lanes – the emerging Masterplan notes that: *“Decanting of residents and shop owners has already started, and meanwhile uses such as Catford Mews are now activating the shopping centre until its phased demolition.”* If there are lessons to be learned from early work dealing with existing businesses and communities then it will be important that these feed-into the Local Plan and Masterplan.

Figure 9.8: Proposed Catford hub (dark brown) and retail area (lighter brown)



9.8.7 A further consideration is **estate regeneration**, with this being a focus of three of the proposed allocations; however, two of the three allocations are committed, and indeed currently building-out. As for the uncommitted proposed allocation – Achilles Street – residents voted in support of estate regeneration in late 2019, such that the question for the Local Plan is now how it should happen, including in terms of development quantum. A net increase of 497 homes is proposed at this 1.4 ha site, which is an ambitious quantum that will require tall buildings, yet details are not currently set out in the site specific policy. There may be a need to explore options further ahead of plan finalisation.

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

Figure 9.9: Recent estate regeneration



View development at Heathside and Lethbridge (BPTW)

Commentary on other policies

- 9.8.9 Developing strong communities is a central aim of the design led policies **QD1** (Delivering high quality design in Lewisham), **QD2** (Inclusive and safe design) and **QD3** (Public realm and connecting places). Notably:
- Policy **QD1** states development proposals will be favoured where they positively contribute *towards “towards local identity, character and sense of community”*, contributing to numerous element of this SA theme’s objective.
 - Policy **QD2** emphasises that proposals should be accessible to all and that housing is designed to *“meet the different requirements of Lewisham’s resident population”* highlighting the need to provide for wheelchair users and other forms of accessible/adaptable dwellings to reduce the risk of exclusion.
 - Policy **QD3** (Public realm and connecting places) states that public realm should maximise opportunities to improve connections to existing or proposed community infrastructure and where appropriate make provisions for infrastructure such as water fountains, public conveniences, shading and public art.
- 9.8.10 Policy **HO4** (Housing estate maintenance, renewal and regeneration) emphasises the importance of meaningful consultation with the local community in the design and proposal of any estate renewal to ensure: *“Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration”*. It notes that by developing cohesive communities the safety and security of residents improves.

- 9.8.11 Policy **EC19** (Public houses) highlights the important social function public houses provide in supporting community cohesion, as such the policy sets a preference to preserve public houses. Through policies **EC10** (Town centres at the heart of our communities), **EC15** (Local Centres), **EC18** (Culture and the night-time economy) and **EC20** (Markets) the development management policies acknowledge the important role the local economy has in terms of acting as an anchor for community activity and therefore strengthening community character. Whilst **EC17** (Concertation of uses) shows recognition that the local economy can contribute to good health through compliance with the Healthier Catering Commitment Standard as: *“Hot food takeaways are now recognised as an ongoing concern with respect to the wider systems approach to health and well-being.”*
- 9.8.12 In addition, policies **EC1** (A thriving and inclusive local economy), **EC4** (Providing suitable business space and affordable workspace) and **EC9** (Workspace training and job opportunities) focus on extending economic opportunities across the Borough. Providing job opportunities, training and affordable workspace can all be viewed as a means to deliver equality of opportunity. Policy **EC1** states that the Council is *“committed to tackling inequalities by ensuring residents have access to good quality job opportunities along with education, skills and training”*. Policy **EC9** sets out conditions for new developments to deliver equal working opportunities *“All proposals for major development will be required to provide job and training opportunities to Lewisham residents, including apprenticeships.”*
- 9.8.13 Through policy **TR1** (Sustainable transport and movement) the Local Plan also acknowledges that developing sustainable transport provisions and improving accessibility to public transport can support tackling local deprivation as it contributes to *“ensuring equality of access to opportunities”*. Furthermore, both **TR1** and **TR3** (Healthy streets as part of a healthy neighbourhood) highlight the key link between good health and active modes of transport, demonstrated by the commitment to the Mayor of London’s Healthy Streets approach.
- 9.8.14 The link between public realm, accessibility and health and wellbeing is recognised through a range of policies. Design principles can support good health outcomes, and Policy **TR3** and design-focused policies **QD1**, **QD2**, **QD3** identify this. Additionally, the acknowledgement of the health and wellbeing benefits of green infrastructure demonstrates the plan’s holistic approach to delivering good health in the Borough; as policy **GR1** (Green infrastructure) notes *“They are also integral to supporting sustainable communities and healthy lifestyles providing a wide range of environmental, social and economic benefits.”*

Appraisal of the plan as a whole

- 9.8.15 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. These matters are discussed in further detail elsewhere, both as part of the assessment of growth scenarios and as part of this discussion of the Draft Plan as a whole.
- 9.8.16 With regards to the proposed DM policies, the Draft Local Plan includes requirements in respect of numerous matters that will help to ensure that development has the effect of reducing inequality, supporting good health and addressing pockets of relative deprivation and poor health in the Borough. As discussed above, stringent policies are proposed in respect of matters including community infrastructure, affordable and specialist housing needs, and policy in respect of air quality is also of note, as this is an important health related consideration. Policy support for an increase in the number of homes delivered at small sites in the Borough’s Strategic Area of Regeneration is another key consideration. Also of note here are policies proposed in respect of environmental health considerations, with the Draft Local Plan including policies on: Amenity and agent of change; Noise and vibration; External lighting; Building alterations, extensions and basements; and Infill and backland sites, back gardens and amenity areas.
- 9.8.17 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. There is 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.

9.9 Economy

Objective: Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.

Commentary on the spatial strategy

- 9.9.1 There are two headline considerations, namely: A) proposed mixed-use redevelopment at a number of existing employment sites; and 2) the proposal to deliver new employment floorspace through mixed use redevelopment schemes at town, district and local centres, most notably Lewisham and Catford.

Mixed use redevelopment of existing employment sites

- 9.9.2 There are a number of proposals to redevelop existing Locally Significant Industrial Sites (LSIS), in order to deliver new and improved employment floorspace, often alongside enabling residential uses. Providing a wide range of new employment floorspace is important, particularly given recent and committed losses of (vacant and underused) employment land as part of plan-led (Core Strategy, 2011) regeneration in the north of the Borough (in particular, the Convoys Wharf MEL scheme will lead to a net loss of 44,500 m² B-class floorspace, whilst the Timber Yard, Deptford Wharves at Oxestalls Road MEL scheme will lead to a net loss of 10,787 m², although both schemes will provide for an element of new modern workspace). The Employment Land Study (2019) sets a target of increasing the total B-class floorspace by circa 1,000 m² per annum, after having taken into account recent and committed losses in the north of the Borough. It is also important in light of local economic objectives around supporting micro and small sized businesses in target industries, particularly within the cultural, creative and digital sector, which will tend to be well suited to operating from higher density mixed use developments. However, there is also a need to give consideration to more qualitative matters, namely the precise type and nature of B-class space that is provided and, and question whether the types of light industrial uses currently on-site will be able to continue to operate following higher density mixed use development. This is an important consideration, given trends across London for light industrial uses to move outwards and out of London; and there is a need to consider implications for those who rely on existing industries for employment, who might be geographically clustered and/or tend to be at risk of unemployment. This matter is explored in detail within Appendix IV. Set out below is a discussion of each sub-area in turn.

Central sub-area

- 9.9.3 The two uncommitted allocations currently comprising designated industrial land are proposed for employment-only schemes, hence there is relatively limited concern:
- Land at Randlesdown Road and Bromley Road comprises a small part of the Bromley Road Strategic Industrial Location (SIL), which is the only SIL outside of the north of the Borough. Site specific policy explains: *“It is currently occupied by a mix of commercial uses including a car wash, car dealers and open storage facility. The existing buildings and boundary treatments are of a poorer quality and detract from local area character. Redevelopment and site intensification will provide for a more optimal use of the employment land. There is also a significant opportunity to improve the environmental quality of the site and local amenity, particularly along the Bellingham station approach and the A21 Corridor.”*
 - Molesworth Street Car Park (Lewisham) is a designated Locally Significant Industrial Site; however, the site currently comprises a car park (also noting that the majority of the LSIS is used as a data-centre).
- 9.9.4 Also of note is Ravensbourne Retail Park, which is adjacent to the Bromley Road SIL, such that there will be a need to ensure that operations within the SIL are not impacted. Proposed site specific policy requires: *“Buffers between the adjoining employment sites will need to be introduced, and where they are existing, enhanced. These should include elements of green infrastructure wherever feasible.”*

North sub-area

- 9.9.5 With regards to the Surrey Canal Road SIL, there are two adjacent small proposed allocations that would involve mixed use redevelopment at the eastern extent of the SIL:

- SIL at Surrey Canal Road and Trundleys Road would involve 189 homes on a 0.55 ha site (now at the pre-application stage). The proposed site specific policy explains: *“The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at their western edge. It is occupied by a mix of industrial units and associated yard space, a scrap yard, and a small terrace of retail and residential uses at the southernmost end along Trundley’s Road.”*
 - SIL at Apollo Business Centre would involve 59 homes on a 0.42 ha site, i.e. a relatively low density scheme. The proposed site specific policy explains: *“The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier at their western edge. It is currently occupied by a business centre.”*
- 9.9.6 Lower Creekside LSIS (1 ha; 160 homes) at Deptford is another important site, including as it is uncommitted. The site is occupied by workshops, offices and creative industries. Policy states: *“Redevelopment provides the opportunity to regenerate a brownfield site, build on the existing Deptford Cultural Quarter as a creative hub whilst introducing new uses including residential. Redevelopment can also provide public realm and access improvements to enable an uplift in the environmental quality of the area and build on the relationship with the Faircharm redevelopment to the north and the Trinity Laban Centre to the north-west.”*
- 9.9.7 Also of note are the two other proposed allocations at Deptford that are near committed, in that planning applications have been submitted or pre-application discussions are at an advanced stage:
- Sun Wharf Mixed-use Employment Location (1 ha; 235 homes) - is a designated Mixed Use Employment Location (MEL) comprised of a mixture of storage sheds and warehouses. Redevelopment provides the opportunity to build on the existing Deptford Cultural Quarter as a creative hub and taking advantage of the site’s position close to Greenwich Rail and DLR station, both of which can be accessed by foot or cycle via Ha’penny Hatch Bridge that crosses over Deptford Creek. There are also opportunities to improve the environmental quality of the area whilst retaining the character of the adjoining Deptford Creek Conservation Area.
 - Creekside Village East, Thanet Wharf MEL (0.61 ha; 393 homes) - gives rise to more limited concerns as, whilst a designated MEL, is currently vacant. Again, redevelopment provides the opportunity to build on the existing Deptford Cultural Quarter as a creative hub

East sub-area

- 9.9.8 Blackheath Hill LSIS (0.31 ha; 30 homes) – is a LSIS for which the proposed policy states: *“Redevelopment and site intensification... can make more optimal use of the land and enable the delivery of new and improved workspace to support long-term viability of the LSIS.”*
- 9.9.9 Southbrook Mews (0.24 ha; 23 homes) - comprises a non-designated employment site which is located adjacent to Burnt Ash local centre. Policy states: *“Redevelopment and site intensification, along with the introduction of a wider range of uses, can enable the delivery of new and improved workspace to and help to support the long-term vitality and viability of the local centre.”*
- 9.9.10 Travis Perkins and Citroen Garage (0.54 ha; 52 homes) comprises part of the Manor Lane LSIS, and is currently occupied by a builders’ merchants and a car dealers and associated showroom. Policy states: *“Redevelopment and site intensification... can make a more optimal use of land and enable the delivery of new and improved workspace to support long-term viability of the LSIS.”*

South sub-area

- 9.9.11 The proposal is to redevelop two existing LSIS at BGLS, namely at Stanton Square (0.97 ha; 94 – 292 homes) and Worsley Bridge Road (1.26 ha; 122 – 380 homes). Effective re-provision of existing uses, taking account not only of the planning use class but also more specific characteristic of existing uses, could prove more challenging under a higher growth scenario;²⁶ however, it is noted that the area is somewhat unique in respect of being associated with high industrial vacancy rates.²⁷

²⁶ At both sites initial indications are that the ratio of homes to m2 employment floorspace might be in the region of 11 (under a high growth scenario) to 34 (under a low growth scenario).

²⁷ The BLE LEIA states: *“Conversely to the trend across the rest of the Corridor and trends across London, industrial rental values have decreased in recent years in Lower Sydenham. This could be a result of the high industrial vacancy rates that have been common in the area over the last 10 years due to the large supply of industrial space in this outer London location.”*

- 9.9.12 Focusing on Worsley Bridge Road, the assumption is that employment land will comprise 33% of total floorspace after redevelopment, which would mean that there is a net loss of employment space under the lower growth scenario, but this loss could be mitigated under a higher growth scenario and there could even be a net gain in terms of total employment floorspace (because a higher density scheme will involve more homes / residential floorspace and, in turn, more employment floorspace).

West sub-area

- 9.9.13 There are four proposed allocations of note:

- Mantle Road (0.12 ha; 17 homes) is a small non-designated industrial site. The site lies adjacent to Brockley Cross local centre, and development provides the opportunity to extend the parade of shops, strengthen the area's character whilst providing active frontage to improve natural surveillance and improving access to Brockley rail station. Proposed site specific policy states: *"The operational requirements of the employment uses across the site should be taken into account. The development should also be designed so as to allow adequate amenity and access for the residential uses, without prejudicing or precluding on-site employment uses."*
- Clyde Vale LSIS (0.12 ha; 15 homes) – is currently being used for light industrial uses, located adjacent to Forest Hill District Centre. Proposed site specific policy states: *"Comprehensive redevelopment provides the opportunity to deliver new and improved employment floorspace, along with environmental improvements, through the provision of enabling residential uses. It will also improve the vitality and viability of the district centre and reinforce its role within the borough's town centre hierarchy... Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location..."* In this instance the scale of the site could lead to challenges.
- Willow Way LSIS (1.29 ha; 175 homes) - this LSIS is located adjacent to Upper Sydenham/Kirkdale local centre, with policy stating: *"Comprehensive redevelopment provides the opportunity to optimise the use of land with a mix of uses including the delivery of new and improved employment floorspace, alongside enabling residential uses, to complement the existing mix of uses surrounding the site and protect the amenity of residential properties facing the site."* There is potentially more limited strategic need for redevelopment here, recognising that it is adjacent to a local centre (only, as opposed to a district centre); however, it is recognised that the site currently hosts town centre uses, retail, non-industrial employment, car services and a car park, in addition to industry.
- Perry Vale Locally Significant Industrial Site (0.72 ha; 122 homes) - This LSIS, currently being used for industrial uses, is located within Forest Hill District Centre. Policy states: *"Comprehensive redevelopment provides the opportunity to deliver new and improved employment floorspace, along with environmental improvements, through the provision of enabling residential uses. It will also improve the vitality and viability of the district centre and reinforce its role within the borough's town centre hierarchy."*

Enhancing the employment offer of town and district centres

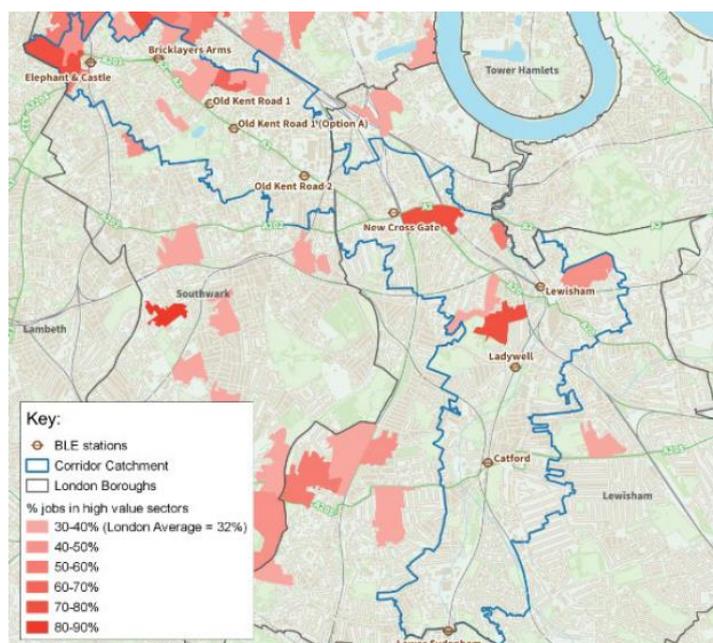
- 9.9.14 Aside from targeted redevelopment of existing industrial and other employment sites, the wider employment strategy is focused on delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The BLE LEIA (2020) explores the potential to enhance the economy of New Cross Gate, Lewisham, Catford and BGLS, and it may be that opportunities can be more fully realised via higher growth under a BLE scenario. Focusing on Catford and BGLS, both locations are associated with low levels of employment in knowledge industries (3% for Lower Sydenham, compared to 16% for Lewisham and 32% for London), which is certainly an issue to be addressed. The downside can be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *"Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase, existing sites are redeveloped, and the economy shifts to higher value employment."* However, given that these areas are starting from a low baseline, in respect of knowledge industry jobs (see Figure 9.10), there are limited concerns. Also, concerns are allayed given Local Plan support for increased delivery of affordable workspace, with the LEIA suggesting: *"The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate."* For Catford, the LEIA also suggests: *"extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses."* Also of note are the following policy requirements, proposed for the Catford Shopping Centre and Plassy Road Island proposed allocations respectively:

“Buildings should provide for a range of footprint sizes to accommodate a variety of town centre, commercial and community uses, and be designed to provide flexibility to enable sub-division of units.”

“Retail and commercial elements should reflect the site’s immediate town centre context, providing a mix of unit sizes and workspaces to support a wide range of uses and businesses.”

- 9.9.15 Laurence House and Civic Centre is a key proposed allocation, in that it currently supports roughly 18,700 m² employment floorspace. Redevelopment is set to result in a net loss of employment floorspace, but a net gain in respect of main town centre uses, and the new employment offer will be targeted so as to support a new ‘employment quarter’ within Catford town centre providing a wide mix of business units.

Figure 9.10: Areas with a high proportion of knowledge sector jobs



Commentary on other policies

- 9.9.16 Local Plan policies **EC1 – EC22** centre on supporting the local economy and employment in the Borough.
- 9.9.17 Policy **EC1** (A thriving and inclusive economy) frames the Borough’s approach to stimulating the local economy, including through supporting sectors of local importance, delivering strategic infrastructure that can enable access to opportunities, providing residents with training and skills and delivering more affordable workspace. The policy prioritises cultural and creative industries noting that these “contribute to the diversity and distinctiveness of Lewisham’s neighbourhoods and play an important role in the local economy” in particular supporting the Lewisham North Creative Enterprise Zone. Policy EC1 recognises the importance of the delivery of strategic infrastructure to create access to economic opportunities. Transport infrastructure plays an important role in economic growth and policy TR2 (Bakerloo line upgrade and extension) is recognised as fundamental for supporting significant strategic growth through “helping to unlock the development potential of strategic sites”.
- 9.9.18 A number of policies focus on boosting the availability and delivery of workspace. Policy **EC2** (Protecting employment sites and delivering new workspace) sets out the Borough’s employment floorspace need, noting that *“There is a forecast need for 21,800 square metres of net additional employment floorspace (Use Class B1) in the Borough up to 2038”*. Furthermore, the policy sets out measures to protect Strategic Industrial Locations from unnecessary loss, stating that co-location of employment and other compatible uses will only be supported at selected sites.

- 9.9.19 Policies **EC3** (Location and design of new workspace), **EC4** (Providing suitable business space and affordable workspace), **EC5** (Locally Significant Industrial Sites (LSIS) – formerly LEL), **EC6** (Mixed-use Employment Locations (MEL)), and **EC7** (Non-designated employment sites) all provide policy guidance on the delivery of specific types of work space. For instance, policy EC5 supports the growth of sectors that perform a key role in the Borough. The policy notably explains that: *“LSIS play an important role in the local economy as a key source of the Borough’s industrial land capacity and jobs”*. Policies EC3 and EC4 focus on supporting investment through the delivery of new workspace. Particularly important is policy EC4, which requires new proposals to deliver affordable workspace *“at an appropriate range of rents, particularly to meet the needs of micro, small and medium sized businesses, including start-ups.”* The shortage of low-cost and affordable workspace is identified as a significant issue by Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019). As set out in the draft London Plan, low-cost workspace refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space. In Lewisham it has a key local role in supporting the cultural, creative and digital industries. Low-cost workspace has typically been scattered across town centres and areas such as New Cross and Deptford, and clusters are also present along the East London Line (Overground) corridor; however, availability is increasingly limited.
- 9.9.20 A number of policies look to support the vitality of the Borough’s town centres, from supporting current town centres to opportunities to invest in potential centres. Policy **EC10** (Town centres at the heart of our communities) shapes an approach to protect the long-term viability of established town centres. Policies **EC11** (Town centre network and hierarchy) and **EC12** (Location of new town centre development) looks at steering investment towards town centres, by taking a ‘town centre first’ approach. **EC11** maps out these centres and the hierarchy of these locations. Whilst policy EC14 (Major and District Centres) notes that District town centres, such as Blackheath, Deptford and Forest Hill, should be utilised to support primary shopping areas in the Major town centres of Lewisham and Catford. This aligns well with the IIA objectives through steering investment towards economic hubs.
- 9.9.21 Policies **EC8** (Railway arches) and **EC22** (Meanwhile uses) focus on optimising underutilised land, to maximise the economic potential of underused spaces in the Borough. In particular EC8 notes that the provision of railway arches *“is important to smaller and independent businesses, including in the creative and cultural industries.”*
- 9.9.22 Policies **EC18** (Culture and the night time economy) and **EC19** (Public houses) focus on the interaction between the local economy and culture. EC18 supports the six identified night time economy hubs; and EC19 establishes protection for public houses in light of their community, social and economic functions within the community. Similarly, **EC20** (Markets) recognises the cultural significance of the Borough’s markets, but also the economic role these play through supporting employment, particularly local jobs.
- 9.9.23 Policy **TR7** (Digital and communications infrastructure and connectivity) is also of note. It focuses on enhancing digital infrastructure to *“facilitate growth and diversification of the local economy”*. It sets out the standard of digital infrastructure required in new development proposals, in line with the London Plan Policy SI6 (Digital connectivity infrastructure). This policy will be particularly important in supporting the growth of new potential sectors in the Borough, particularly the cultural, creative and digital industries.

Appraisal of the plan as a whole

- 9.9.24 It is difficult to draw an overall conclusion. On one hand several proposed allocations comprise existing industrial land, or land designated as a Mixed Use Employment Location, and whilst the firm commitment is to ensure no-net-loss of employment floorspace, and to deliver new employment floorspace that meets the needs of existing businesses, there is inevitably a degree of risk regarding the potential to effectively co-locate residential and light industrial uses. 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.

- 9.9.25 With regards to the proposed DM policies, the Draft Local Plan includes a range of relevant policies within the section on Economy and culture. The following is considered to be a particularly important statement: *“The net loss of industrial capacity will only be considered in very exceptional circumstances. Applicants must provide evidence to suitably demonstrate that the loss is necessary owing to reasons of feasibility and the loss has been minimised as much as reasonably practical. This must include evidence of different site layout, design and development typologies considered through the design-led process, taking into account individual site circumstances such as location and site configuration. Furthermore, to offset the loss of industrial capacity applicants will be required to demonstrating that a wider public benefit would be achieved through the scheme...”* Other key policies relate to support for the creative and cultural industries, designation of new Cultural Quarters, night time economy hubs, flexibility for a much wider range of uses in town centres (for district centres, removing threshold approach for retaining A1 uses) and new policy on affordable workspace.
- 9.9.26 In **conclusion**, on balance there is support for higher density schemes that will deliver additional employment floorspace, including lost 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 mixed used redevelopment of existing employment sites, in that re-provision of existing and new space to accommodate light industrial uses can be problematic, including at lower cost and affordable rents, with potential risks that some industries and businesses may need to re-locate out of the Borough and potentially out of London. For this reason, **uncertain positive effects** are predicted.
- 9.9.27 A final important consideration relates to emerging ideas for a green and fair economic recovery following the Covid 19 pandemic – see Box 9.1.

Box 9.1: Emerging ideas for a green and fair economic recovery following the Covid 19 pandemic

A recent announcement²⁸ by the Government explains: *“The COVID-19 outbreak has resulted in one of the largest ever shocks to the UK economy and public finances... While impacts have been widespread, they have not been equally distributed. Evidence shows the varying impacts on different groups or people with specific characteristics, including, but not limited, to BAME individuals, single parents, disabled individuals, victims of domestic abuse and low income groups, many of whom have been disproportionately affected... We will build on [work to date] to understand the key drivers of these disparities [and] tailor our interventions...”*

Similarly, a more recent report²⁹ explains: *“There have already been more than 1 million jobs lost during the Covid-19 crisis... The impact of the labour market downturn has been highly uneven. Black, Asian and minority ethnic workers are over-represented in the sectors worst hit by the economic crisis, including hospitality, which was shut down to control the spread of the virus. Women are also nine percentage points more likely to work in a shut-down sector. The unemployment rate among 18 to 24-year-olds is predicted to reach 27% by the end of 2020, with a cohort of young people running the risk of experiencing labour market ‘scarring’ that will affect their earnings and employment for years to come. Even before the crisis, disabled people were 29 percentage points less likely to be in work than people who are not disabled, and many disabled people face new barriers in the workplace as a result of the ongoing pandemic....”*

At the time of writing there is much discussion of the potential for a ‘green’ economic recovery following the Covid-19 pandemic and the national lockdown, with the opportunity taken to: create jobs in green growth sectors including energy efficiency, the electrification of heating, renewable power, electric vehicles, electricity transmission and storage, transport and green infrastructure; take the positives from the common experience of national lockdown; and ensure that the nation is well prepared for risks akin to a pandemic moving forward, including the direct, indirect and cumulative impacts of climate change. There have been many contributions on this subject, including from:

²⁸ See <https://www.gov.uk/government/publications/our-plan-to-rebuild-the-uk-governments-covid-19-recovery-strategy/the-next-chapter-in-our-plan-to-rebuild-the-uk-governments-covid-19-recovery-strategy--2>

²⁹ See: <https://labour.org.uk/wp-content/uploads/2020/11/GER-10.11docx.pdf>

- The Committee on Climate Change (CCC)³⁰ - on 6th May 2020 the CCC wrote to the Prime Minister explaining that: *“As the Government considers its approach to rebuilding after the COVID-19 crisis we are writing to advise on how climate policy can play a core part. Actions towards net-zero emissions and to limit the damages from climate change will help rebuild the UK with a stronger economy and increased resilience.”* Specific priorities include:
 - Housing retrofits and building new homes that are fit for the future – *“Where the skills to deliver these measures already exist, these projects can begin now, are labour-intensive, and have direct social benefits of more comfortable homes leading to improved well-being and health.”*
 - Electricity networks – *“must be significantly strengthened across the UK to accommodate electrification of heat and transport... Post-COVID-19 economic recovery presents an opportunity for governments, regulators and the industry to work together to accelerate these investments.”*
 - Tree planting, peatland restoration and green infrastructure – *“The importance of urban greenspace to people has been highlighted... Restoring parks, urban tree planting, and supporting the green roof and sustainable drainage industries can help to bolster the UK’s slow-growing adaptation services sector.”*
 - Transport networks – as stated by the UK Transport secretary in May 2020: *“We recognise this moment for what it is: a once in a generation opportunity to deliver a lasting transformative change in how we make short journeys in our towns and cities.”*
- The Royal Town Planning Institute (RTPI) - recently published Plan the World we Need,³¹ which begins with the following statement: *“To recover from Covid-19, we need to make plans. These must be holistic in nature, integrated in structure, and resourced for delivery. They need to accelerate progress to a zero carbon economy, increase resilience to risk, and create fair, healthy and prosperous communities.”*

The following statement from an earlier RTPI report on Priorities for Planning Reform (2020)³² is also of note: *“The current situation makes it all the more important to support better planning, and avoid the risk and inefficiency of deregulation, uncoordinated investment... and uncontrolled development... The lockdown period has demonstrated the importance of high quality housing, resilient infrastructure, local services and green space, along with the inequalities that people face when accessing these. The crisis has also presented opportunities to learn from temporary improvements to air quality and biodiversity, different ways of working, and new models for cooperation on other shared challenges such as climate change.”*
- The Labour Party – amongst other things, the recent report on a Green Recovery (referenced above) focuses on retrofitting the existing building stock for energy efficiency and renewable heat/power, suggesting that *“more than 100,000 new positions could be potentially supported within the next 18 months”* if a range of policy steps are taken. The report also includes a focus on training skilled workers, explaining that: *“Skills shortages threaten the UK’s ability to transition to net zero. New technologies and the changing UK economy are shifting the demand for skills. The CBI has estimated that nine in 10 employees will need to reskill by 2030. And in the energy sector, the transition to net zero is estimated to require 260,000 new roles and a further 140,000 jobs to replace those leaving the workforce.”*

The matter of a skills gap holding back steps to achieve decarbonisation of the built environment (both through new build and retrofitting) has long been understood. The CCC report *UK Housing: Fit for the future?* (2019) explained that:³³ *“Developing a better-skilled construction sector will deliver better homes, high-quality jobs and ensure we realise the domestic and international industrial opportunities related to low-carbon building. Professional standards and skills across the building, heat and ventilation supply trades need to be reviewed, with a nationwide training programme to upskill the existing workforce, along with an increased focus on incentivising high ‘as-built’ performance.”* In the London context, the London Energy Transformation Initiative (LETI) *Climate Emergency Design Guide* recently concluded that *“by 2025, 100 percent of new buildings must be designed to deliver net zero carbon, and the whole construction industry will need to be equipped with the knowledge and skills necessary.”* It broke down skills gaps under the following headings: Energy Modelling, Designing, Constructing, Operating and facilities management.³⁴
- Most recently, the UK Climate Assembly (September 2020)³⁵ found that 79% of the assembly ‘strongly agreed’ or ‘agreed’ that *“steps taken by the government to help the economy recover should be designed to help achieve net zero”*; and 93% equally supported the statement: *“As lockdown eases, government... [should] encourage lifestyles to change to be more compatible with reaching net zero”*.

³⁰ See theccc.org.uk/publication/letter-building-a-resilient-recovery-from-the-covid-19-crisis-to-prime-minister-boris-johnson

³¹ See rtpi.org.uk/news/plan-the-world-we-need/

³² See rtpi.org.uk/policy/2020/april/priorities-for-planning-reform-in-england/

³³ See theccc.org.uk/publication/uk-housing-fit-for-the-future/

³⁴ See leti.london/cedg

³⁵ See climateassembly.uk/

9.10 Historic environment, heritage, character and culture

Objective: Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.

Commentary on the spatial strategy

- 9.10.1 The Borough is associated with wide range historic environment sensitivities, which have been taken into account as a key factor when determining indicative development densities. This is particularly evidenced by the proposal to support lower densities at several sensitive sites, following application of a design-led process, rather than assigning an indicative density in accordance with the London Plan SHLAA standard methodology. Notably,
- 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.
 - **Catford** is notably sensitive to taller buildings, but concerns in respect of indicative densities are limited recognising that they are derived from the emerging Catford Town Centre Masterplan, which states support for: "... well-designed and sensitively integrated higher density development that positively responds to its local context. In Catford this includes responding to the setting of listed buildings, the Culverley Green Conservation Area immediately to the south of the town centre as well as the town centre's visibility in short, medium and longer distance views including from local parks such as Mountsfield Park and Blythe Hill Fields."
- 9.10.2 Maintaining a focus on Catford, it is fair to say that the proposed regeneration will be 'heritage-led' in several respects, including the proposal to reinstate a network of historic lanes to the north of the Broadway. The emerging Masterplan explains that: "*Post-war development in Catford has been piecemeal and has undermined Catford's historic character and qualities. This is reflected in the redevelopment of the historic streets to the north of the Broadway in the 1970's incorporating the Catford Centre, Milford Towers and multi-storey car park...*"
- 9.10.3 With regards to **BGLS**, the plan is supportive of notably higher growth under a BLE Phase 2 scenario, which inevitably leads to a degree of tension with historic environment objectives; however, the area is associated with relatively limited sensitivity. There is a need to consider the cluster of listed buildings / structures associated with Livesey Hall War Memorial, which is adjacent to the west of the gas holders site; the character of the Bellingham Estate to the east, which was influenced by 'garden city' principles and is associated with a homogenous form of low density housing; and locally important buildings within the Stanton Square LSIS proposed allocation, including a well-preserved art deco building.
- 9.10.4 Finally, it is important to note that an **archaeological priority area** follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement. This central corridor through the Borough is a focus of growth, which potentially leads to a degree of tension.
- 9.10.5 Other **notable sites** include:
- Albany Theatre (north sub-area) – the theatre is a non-designated heritage asset of historical and social significance, with Deptford Conservation Area immediately east including the Grade II listed Deptford Ramp, the oldest surviving railway structure in London. Policy states: "*Redevelopment offers the opportunity to optimise the use of the site by introducing residential uses whilst upgrading the quality of the existing community facility and securing a viable future for the Albany Theatre that will support the vitality and viability of Deptford District Centre. Redevelopment presents opportunities to enhance the local amenity, in keeping with the surrounding area and adjoining Conservation Area.*"
 - Lower Creekside LSIS (north sub-area) is at the pre-application stage, but is nonetheless of note. Site specific policy explains that: "*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.*"

- Blackheath Hill Locally Significant Industrial Site (east sub-area) is of note as the only non-committed proposed allocation in proximity to the Maritime Greenwich World Heritage Site. Proposed site specific policy explains that: *“Development should be designed having regard to the heritage assets adjacent to the site, including the setting of the Blackheath Conservation Area, Listed and Locally Listed Buildings to the east, on Dartmouth Row.”*
- Homebase/Argos, Bromley Road (south sub area) – site specific policy explains: *“Development should positively respond to Southend Village and heritage assets located opposite the site on Bromley Road, including the three Grade II listed buildings associated with St John the Baptist Church, and their setting.”*
- Stanton Square Locally Significant Industrial Site (south sub-area) – site specific policy explains that: *“The retention and incorporation of the well-preserved 20th Century art deco building should be considered as part of the overall design of the site. Consideration should also be given to the well-preserved set of Victorian buildings, the architectural salvage building, and the Bell pub...”*
- Beadles Garage (south sub-area) - site specific policy explains that: *“Consideration should also be given to creating an enhanced relationship between the site and the designated public open space... immediately to the north of the site whilst respecting it’s character and context as an historic cemetery...”*
- Featherstone Lodge, Eliot Bank (west sub-area) - Featherstone Lodge is a locally listed mid 19th Century house located at Eliot Bank and sits within gardens. Proposed policy states: *“Redevelopment of the site will provide the opportunity to provide for specialist older person’s accommodation whilst retaining the character of the area and contributing positively to the listed buildings and locally listed buildings that are located within the vicinity of the site.”*

Commentary on other policies

- 9.10.6 Section 6 of the Local Plan is dedicated to preserving and enhancing the value and significance of the Borough’s historic environment, assets and settings. Policy **HE1** (Lewisham’s historic environment) takes a strategic view and sets out Lewisham’s general approach towards heritage, introducing the chapter of heritage policies. It first of all sets out measures for how the Council will preserve and enhance the historic environment such as *“Ensuring the significance of the Borough’s heritage assets is fully understood, positively valued and that their contribution to sustainable communities is recognised”*. The policy sets out how proposals should consider the historic environment, noting: *“Any harm should be clearly and convincingly justified, and will be weighed against the public benefit of the proposal”*. A strength of this policy is that it recognises that historic assets include landscapes, water bodies, urban spaces as well as physical historic assets; which will all play an important role in retaining and reinforcing the Borough’s distinctive character.
- 9.10.7 Policy **HE2** (Designated heritage assets) maps out the areas of designated assets. Although the Maritime Greenwich World Heritage Site is located in the neighbouring Borough of Greenwich, the Local Plan recognises the significance of the buffer zone, which covers Blackheath within the plan area. Given the proximity of Blackheath to the site, it plays an important role in shaping the immediate setting. Therefore, this buffer zone is not only important for the site’s ‘Outstanding Universal Value’ but also a valuable cultural asset that shapes the townscape of the north east of Lewisham. The policy identifies Lewisham’s key designated heritage assets, including conservation areas, listed buildings, scheduled ancient monuments, registered parks, gardens and London squares. The policy sets out how new development proposals should consider and respond sensitively and positively to these assets. In general, development will only be supported if the proposal can demonstrate specific efforts to preserve or enhance the historical asset, for instance, proposals impacting listed buildings, will only be supported if: *“The setting of Listed Building is preserved or enhanced to better reveal the significance of the asset”*.
- 9.10.8 Policy **HE3** (Non-designated heritage assets) sets of the Local Plan’s stance on locally listed buildings, areas of special character and archaeological priority areas (APAs). It should be noted that the identified APAs run down the middle of the Borough and through the key growth areas, from the New Cross-Lewisham-Catford corridor down to Bellingham and Bell Green. The policy notes: *“Proposals on sites that lie within or adjacent to an APA must be accompanied by an archaeological assessment.”* Therefore, policy HE3 may be an important tool to ensure that future development does not have significant effect on the non-designated sites and the distinctive character of the Borough.

- 9.10.9 Policy **HE4** (Enabling development) recognises the need to secure the future of heritage assets through development proposals. It sets out circumstances where proposals may be supported for the benefit of heritage assets but contravene other planning policies. This demonstrates a commitment to reinforcing the Borough's distinctive historic character.
- 9.10.10 Also of note are the proposed "high quality design" policies, including **QD4** (Building heights), **QD5** (View management), **QD6** (Optimising site capacity) and **QD11** (Infill and backland sites, back gardens and amenity areas). With regards to tall buildings, Policy QD4 sets out the following as one of the five key criteria to be met: *"Preserve or enhance the significance of heritage assets and their setting"*.
- 9.10.11 Policy HO9 Housing with shared facilities (Houses in Multiple Occupation) is also of note. Proposed policy criteria seek to avoid *"an overconcentration of HMOs in the area" and adverse impacts on the amenity of the surrounding properties and neighbourhood, including cumulative impacts taking account of other HMOs in the area"*.
- 9.10.12 Finally, there are a number of policies within the 'Economy and Culture' section which seek to support Lewisham's thriving and evolving cultural offer. In particular, Policy **EC18** (Culture and the night-time economy) identifies the Borough's three cultural quarters, Deptford Creekside, New Cross and Forest Hill, which are important for *"cultural, community and commercial activities"*, and notes that proposals with these activities in mind should be prioritised in the cultural quarters. Policy **EC19** (Public houses) acknowledges the important cultural and social value of public houses, setting out the need to protect these social assets. Policy **EC20** (Markets) recognises the cultural significance and vibrancy markets bring to the Borough. This is demonstrated through the commitment to protect current market space and support new market space in "appropriate town centre locations." The Local Plan not only notes the current role markets play as community hubs but also wide ranging historic associations.

Appraisal of the plan as a whole

- 9.10.13 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.
- 9.10.14 With regards to DM policies, the Local Plan includes a section on Heritage, with policies covering: Lewisham's historic environment; Designated heritage assets; Non-designated heritage assets; and Enabling development. The following is a key statement: *"Proposals affecting heritage assets should be of the highest architectural and urban design quality, having regard to and respecting local character and other policies in this plan. Heritage should be considered as an integral component of sustainable communities and must meaningfully inform the design of development. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported, subject to meeting other policy requirements."*
- 9.10.15 It is also important to note the importance of site specific policy. Taking one example, site specific policy for Lower Creekside LSIS, in the north sub-area, 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 of comments submitted through consultation, including by Historic England.
- 9.10.16 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.11 Land and natural resources

Objective: Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.

Commentary on the spatial strategy

- 9.11.1 The spatial strategy leads to limited implications, noting that the great majority of proposed allocations are brownfield, although the following two proposed allocations appear likely to result in a some loss of greenfield land:
- Havelock House, Telecom Site and Willow Tree House, near Horniman Drive is a greenfield site with a “mature landscape setting”. A lower density scheme is proposed, with site specific policy stating: *“A tree survey should identify healthy, mature trees to be retained within the backland plot. Development should... create a public realm space to evoke the feeling of a village green.”*
 - Featherstone Lodge, Eliot Bank is a locally listed mid 19th Century house that sits within mature gardens. Redevelopment of the site will provide the opportunity to provide for specialist older person’s accommodation whilst contributing positively to the listed buildings and locally listed buildings that are located within the vicinity of the site. Site specific policy is proposed as per the Havelock House site.
- 9.11.2 Another consideration here relates to the proposal to reroute the South Circular at Catford. This is explored in detail in Appendix IV, which concludes broad support, as it is difficult to envisage effective town centre regeneration without the realignment. However, realignment will result in the loss of the northernmost part of the St. Dunstons College Jubilee Grounds **Metropolitan Open Land (MOL)**, which is widely valued as providing a green setting to Catford town centre, although it is used only by the school and is not publicly accessible. The MOL Review (2020) concludes a need to ‘conserve and enhance’ the MOL, finding that, whilst it performs quite poorly in terms of certain MOL criteria, it performs well in terms of ‘contributing to the physical structure of London by being clearly distinguishable from the built-up area’. A mitigating factor is that a significant proportion of the MOL that would be lost is the current northeast corner that is already segregated from the main part of the MOL by a small access road (see image in Appendix IV); however, there is no avoiding the conclusion that an area of MOL will be lost that is not insignificant.
- 9.11.3 A final consideration relates to minimising waste, ensuring good waste management and supporting a more circular economy, e.g. with construction waste re-used on-site; however, again it is not possible to infer implications from the spatial strategy. It is noted, however, that the proposal is to safeguard all three existing waste sites within the Borough, namely: the South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross; Recycling Centre (HTL Waste Management Services), New Cross; and Reuse & Recycling Centre (London Borough of Lewisham), New Cross.

Commentary on other policies

- 9.11.4 From the outset the Local Plan notes that higher density and mixed-use development will form an integral part of using land *“more efficiently and flexibly”*. Policies **QD4** (Building heights) and **QD6** (Optimising site capacity) are a demonstration of this.
- 9.11.5 Policy QD4 sets out requirements for proposals for tall buildings to ensure they are of an appropriate scale and massing when viewed in their wider context. The plan recognised the significant potential of tall buildings to support a significant increase in densification, increasing the efficiency with which available land is used, stating that *“it is recognised that tall and taller buildings can support strategic objectives for optimising the use and capacity of land”*.
- 9.11.6 Policy QD6 (Optimising site capacity) directly supports a higher density approach, setting out a requirement that *“optimum density of a site is achieved”*. Although the policy wording is quick to note that optimum density does not mean maximum density it is acknowledged higher density developments will be needed to meet the Borough’s housing needs. Importantly the policy notes the need for *“capacity of infrastructure (including physical, environmental and social infrastructure) to support the density proposed, having regard to the individual and cumulative impacts of development.”*

- 9.11.7 QD6 is supported by policy **HO1** (Meeting Lewisham's housing needs) which notes that an increase in housing supply will be achieved *through "Ensuring that all development proposals make the best use of land and optimise the density of housing sites, in line with Policy QD6 (Optimising site capacity)"*.
- 9.11.8 Policy **SD10** (Ground conditions) details the approach development proposals should take towards contaminated land, making clear the steps and procedures needed to *"demonstrate that any risks associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe"*. This is an important policy to consider alongside optimising density across the Borough as making the best use of land may not always mean maximising density as proposals will need to have regard for the scale of development which may be appropriate in light of existing ground conditions.
- 9.11.9 Policies **SD11** (Reducing and managing waste) and **SD12** (Design to support the circular economy) provide the Borough's principles towards minimising waste. Policy SD11 aligns with London Plan objective to achieve net waste self-sufficiency, setting out comprehensive and robust guidelines for permitting new waste management facilities, including:
- *"It is demonstrated that the waste management capacity at existing safeguarded waste sites has been maximised, and there are no opportunities for appropriately increasing capacity at these sites to meet the identified need;"*
 - *"They achieve a positive carbon outcome or demonstrate that steps are in place to meet the minimum greenhouse gas performance target, in line with draft London Plan Policy S18 (Waste capacity and net waste self sufficiency)"*
- 9.11.10 With regards to Policy SD12, the proposed policy is well aligned with the emerging London Plan, setting out how all development proposals should apply circular economy principles and stating the ambition that *"major development proposals should aim to be net zero-waste"*. Detailed proposals are set out that will also need to be a consideration when exploring site allocation and development density options, namely:
- "Development proposals must be designed to ensure adequate on-site provision for the sorting of recyclable material, composting of organic material and the disposal of general waste during the occupation stage. Proposals will be expected to make provision for:*
- *Dedicated internal and external storage facilities, with flatted residential development including temporary storage space for each unit and communal storage for waste materials pending collection;*
 - *Safe and convenient access to storage facilities, both for building occupiers and collection services;*
 - *Well sited and designed development that avoids and mitigates adverse impact on the amenity of building occupiers and neighbouring site users and uses; and*
 - *Separate provision for commercial and household waste where mixed-used development is proposed."*
- 9.11.11 Policy **SD1** (Responding to the climate emergency) sets out the council's responsibility to "help London to achieve net waste self sufficiency by promoting the circular economy in order to increase the re-use and recycling of materials and achieve reductions in waste going for disposal." This is an important acknowledgement that the Council have an advocacy and enforcement role it play in minimising the Borough's waste.

Appraisal of the plan as a whole

- 9.11.12 The spatial strategy leads to limited implications. All proposed allocations are brownfield, other than two proposed 'backland' sites, and there is no reason to suggest that the proposed approach to growth will lead to challenges in respect of sustainable waste management.
- 9.11.13 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.
- 9.11.14 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.12 Transport

Objective: Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.

Commentary on the spatial strategy

- 9.12.1 Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under 'air quality', a matter of potential overriding importance is matching development densities to PTAL, and on this basis there is support for the proposed strategy. With regards to BGLS, as discussed under 'air quality' and 'accessibility', there is cautious support for higher growth under a BLE Phase 2 scenario, from transport perspective, although there remains much uncertainty ahead of masterplanning work.

Commentary on other policies

- 9.12.2 Policies **TR1 – TR4** are the key detailed transport policies of the emerging Local Plan.
- 9.12.3 Policy **TR1** (Sustainable transport and movement) outlines the Local Plan's pathway towards a modal shift, in line with the Draft New London Plan's objective of 80% of trips to be made by active and public travel by 2041. It sets out requirements for proposals to consider "*connectivity and accessibility to existing and planned future public transport, along with the priority given to improving opportunities for active travel, including walking and cycling routes*". The policy provides further detail on specific future schemes, identifying the key transport schemes in the Borough which development should "provide adequate protection for, and positively respond to the need to facilitate delivery of". Furthermore, this policy highlights the important role connectivity and access to active and public transport play in supporting healthy, sustainable communities and contributing to improving economic equality. By setting out these wider benefits the policy strengthens the argument for proposals to contribute to this modal shift.
- 9.12.4 Policy **TR2** (Bakerloo line upgrade and extension) sets out the Borough's support for delivery of the proposed extension of the Bakerloo line. The potential to unlock strategic sites, particularly at Lower Sydenham and Bell Green, will also result in minimising the need to travel as developments will be encouraged to optimise accessibility to proposed new stations.
- 9.12.5 The prioritisation of active travel is further strengthened by policy **TR3** (healthy streets as part of healthy neighbourhoods). The Healthy Streets Approach is considered a key enabler of good growth and a modal shift in London. TR3 states that major development proposals will have to submit a Healthy Streets Assessment to make evident how they have positively engaged with the programme, it also focuses priority delivery at key movement corridors that link existing neighbourhoods with town centres, which should contribute to a reduction in car reliance and usage.
- 9.12.6 Policy **TR4** (Parking) recognises how a strategic approach to parking can help facilitate a modal shift, this is not only centred around limiting car parking facilities, but also increasing integrating cycle storage.
- 9.12.7 Policies **QD1** (Delivering high quality design in Lewisham) and **QD3** (Public realm and connecting places) encourage high quality public realm design that incorporates connectivity and accessibility into design principles, to encourage the modal shift, as explained in **QD3**: "*Public realm should be commensurate with the role and function of places and the highway network, and reflect the priority given to movement by walking, cycling and the use of public transport, in line with Policy TR3 (Healthy streets as part of healthy neighbourhoods)*".
- 9.12.8 Policy **GR2** (Open space and Lewisham's green grid) seeks to promote the link between the Borough's open spaces, the South London Green Chain and the potential connectivity between these spaces, to further facilitate sustainable transport movements across Lewisham

- 9.12.9 Although policy **TR7** (Digital and communications infrastructure and connectivity) does not support the delivery of transport infrastructure; digital and communications infrastructure will “*facilitate growth and diversification of the local economy*”. This could lead to greater job opportunities in Lewisham, minimising the need to travel outside of Lewisham for work. Additionally, the policy explains that “*new technologies are changing the way in which people work and commute, often reducing the need to travel.*”
- 9.12.10 Policy **TR6** (Taxis and private hire vehicles) seeks to ensure that any development proposals that encourage taxi and private hire use will not impede or create barriers towards the London Plan’s strategic target to increase modal shift towards walking, cycling and public transport (80% of all trips by 2041).

Appraisal of the plan as a whole

- 9.12.11 Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under ‘air quality’, a matter of potential overriding importance is matching development densities to PTAL, and in this respect the proposed spatial strategy is supported. With regards to BGLS, as discussed under ‘air quality’ and ‘accessibility’, there is cautious support for the Local Plan’s commitment to follow a more ambitious, higher density growth strategy under a BLE Phase 2 scenario. All of these factors serve to suggest the likelihood of significant positive effects, although there remains a degree of uncertainty at this stage in the plan-making process, with the potential for more detailed work to understand how the spatial strategy might best serve to respond to existing transport issues/opportunities and also the extent to which transport impacts can be mitigated.
- 9.12.12 With regards to the proposed development management policies, the Draft Local Plan includes a section dedicated to Transport and connectivity with policies on: Sustainable transport and movement; Bakerloo line upgrade and extension; 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 (Public realm and connecting places) and TR3 (Healthy streets as part of healthy neighbourhoods).”
- 9.12.13 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. 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.

9.13 Overall conclusions on the Draft Local Plan

- 9.13.1 The aim of this section is to: draw overall conclusions on the Draft Local Plan; and present a stand-alone discussion of 'cumulative effects';

Overall conclusion

- 9.13.2 The appraisal predicts positive effects in respect of the majority of objectives, with 'significant' positive effects predicted in respect of 'Accessibility'. This 'significant' positive effect is predicted primarily on the basis that the proposed spatial strategy focuses 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. This characteristic of the proposed spatial strategy also enables a conclusion of 'moderate' positive effects in respect of 'Air quality' and 'Transport'.
- 9.13.3 The other topics for which 'moderate' positive effects are predicted are: 'Biodiversity and green infrastructure' (although certain tensions are highlighted), Climate change mitigation (although there is a need for further work to ensure that the spatial strategy makes the most of locational opportunities); 'Housing' (primarily on the basis that that current assumed densities serve to suggest that the London Plan housing target will be met); 'Wider communities issues' (although there are certain tensions, and a need for further work to ensure that existing communities and businesses share in the benefits of regeneration); 'Economy' (there is a clear strategy aimed at supporting growth in target sectors; however, there are certain tensions, particularly around mixed use redevelopment of existing industrial sites); and 'Historic environment and townscape' (with the appraisal serving to demonstrate that understanding of constraints and opportunities has fed-in to the calculation of indicative densities).
- 9.13.4 The only conclusion of overall negative effects is reached in respect of 'Climate change adaptation' on the basis that a significant number of proposed allocations intersect the flood risk zone. This results from the proposal to focus growth along strategic transport corridors that follow river valleys, and the proposal to intensify uses at numerous sites that have historically been used for uses that are less vulnerable to flooding, in particular industrial and retail uses. The proposed strategy is reflective of an understanding that there are steps that can be taken to satisfactorily mitigate flood risk, including through: drainage systems, urban greening (linking with wider climate change adaptation objectives, around minimising the urban heat island effect and ensuring shading for buildings and public spaces); avoiding vulnerable uses on the ground floor, flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and flood resilient design (e.g. to ensure the building's structural integrity is maintained and that drying and cleaning can be facilitated). The proposed strategy and site-specific policy will warrant further scrutiny as part of plan finalisation, mindful of the risk of in-combination impacts.
- 9.13.5 The Council should take these appraisal findings into account as part of plan finalisation, as efforts are made to balance competing objectives, perhaps most notably, on the one hand, socio-economic objectives relating to meeting (and exceeding) the London Plan housing target and meeting employment growth/diversification and town/district centre regeneration objectives, and, on the other hand, minimising tensions with environmental objectives. Whilst there can be 'win-win' opportunities, including in respect of climate change mitigation (heat networks), biodiversity / green infrastructure (e.g. river deculverting) and, in some cases, heritage, there are other environmental objectives for which growth leads to an inherent tension, perhaps most notably flood risk. It will also be important to recall that there can be tensions between competing socio-economic objectives, including objectives relating to changing / 'balancing' local economies on the one hand, whilst meeting the needs of existing communities, including more vulnerable communities and groups within the population, on the other hand; however, tensions of this nature can often be resolved through careful plan-making, e.g. stringent DM policy and masterplans for key areas of change. In respect of DM policy, it will be important to ensure that the stringency of policy aligns with the inherent locational constraints at proposed allocations (e.g. flood risk), and that DM policy feeds into decisions in respect of indicative densities. In respect of masterplans, the Local Plan will need to align with the emerging Catford Town Centre Masterplan, taking careful account of the very specific characteristics of Catford Town Centre that are being established through the masterplanning process.

Cumulative effects

- 9.13.6 The SEA Regulations, which underpin the IIA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. This essentially amounts to a requirement to ‘cast the net wide’ (geographically and temporally) in respect of aspects of the future baseline situation that are taken into account as part of the appraisal. The following are notable ‘cumulative effect’ considerations:
- BLE – the plan is strongly supportive of the BLE, including by highlighting the potential to follow a high growth strategy at BGLS under a BLE Phase 2 scenario. The BLE Phase 1 would deliver benefits not only to LB Lewisham but also to LB Southwark to the west, whilst BLE Phase 2 would likely extend into LB Bromley to the south. Benefits would also be felt more widely, with the BLE Local Economic Impact Assessment (2020) finding that: *“Opportunity Areas on the whole extended and upgraded Bakerloo line between Harrow and Hayes have capacity for over 100,000 new homes and 130,000 new jobs alongside significant wider benefits including improved accessibility, reduced congestion, CO2 emissions and air pollution, and released capacity on other lines.”*
 - BGLS – the plan is supportive of transformative growth in this area regardless of BLE Phase 2, but is clear that there will be an opportunity to follow a notably more ambitious higher growth strategy should BLE Phase 2 become funded. Under a higher growth scenario there would certainly be a need to work closely with LB Bromley, noting that Lower Sydenham Station is currently on the Borough boundary (although there is the possibility of moving the station north, closer to Bell Green). Land in LB Bromley in the vicinity of Lower Sydenham Station is dominated by a large LSIS (of a similar scale to Bromley Road SIL in LB Lewisham), which itself links quite closely to the Crystal Palace Renewal Area to the west, as designated through the adopted Bromley Local Plan.
 - Green Infrastructure - linked to the above, there is an opportunity to work in collaboration with LB Bromley (in particular, given the BGLS strategic growth opportunity) and LB Greenwich in respect of realising the opportunity to enhance the South East London Green Chain to Regional Park status, which is a strategic opportunity set out within the All London Green Grid Supplementary Planning Guidance (SPG). This opportunity would also accord with the aspiration for London to become the World’s first National Park City, as set out within the emerging London Plan; and could also be supportive of taking a catchment-wide approach to managing flood risk in Lewisham (on the basis that greenspace in LB Greenwich and LB Bromley is upstream of locations in Lewisham where there is a risk of flooding).
 - Industrial land – this matter is a focus of the emerging London Plan, with the most recent intervention coming from the Secretary of State for Communities Housing and Local Government, whose letter of March 2020 to the Mayor of London stated: *“Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs’ abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the ‘no net loss’ requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply.”* There is little or no opportunity to bring new industrial land into the supply in Lewisham other than by redeveloping existing industrial sites, which potentially serves to highlight the importance of working in collaboration with neighbouring authorities, in particular LB Bromley and LB Croydon, to ensure that industrial land needs are provided for within the ‘functional economic area’ within which they arise.
 - Retail land – as discussed, the proposal is to redevelop and intensify uses at several out-of-town retail parks. Whilst need for retail parks of this nature has already been examined through the Retail Capacity Study (2019), it will be important to maintain ongoing engagement with neighbouring authorities.
 - Blackheath – is notable for being located on the Borough boundary with LB Greenwich and for being the only district centre that is not proposed a Local Plan allocation. This reflects the extensive conservation area, and the close association of Blackheath with Maritime Greenwich World Heritage Site; however, it will be important to maintain dialogue with LB Greenwich to ensure that there are not any issues to be addressed or opportunities to be realised through targeted growth.

Part 3: What are the next steps?

10 Plan finalisation

10.1 Proposed Submission Plan

- 1.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim IIA Report, responses to the current consultation and further appraisal work.
- 1.1.2 The IIA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

10.2 Submission, examination and adoption

- 1.1.3 Once the period for representations on the Proposed Submission Plan / IIA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The IIA Report will also be submitted.
- 1.1.4 At Examination the Inspector will consider representations (alongside the IIA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If there is a need for modifications these will be prepared and then subjected to consultation, alongside IIA if necessary.
- 1.1.5 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that explains the 'story' of plan-making / IIA and sets out 'the measures decided concerning monitoring'.

11 Monitoring

- 1.1.6 The IIA Report must present 'measures envisaged concerning monitoring'.
- 1.1.7 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Loss of light industrial land, potentially with a focus on the needs of specific types of business;
 - Development in a flood risk zone, and also potentially adjacent to the flood risk zone given uncertainty regarding future flood risk given climate change; and
 - Impacts to existing communities / groups within the population as a result of town and district centre regeneration and the redevelopment of existing industrial and mixed use employment sites.

Appendix I: Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the IIA Report (N.B. this current report is not the IIA Report, but aims to present the information required of the IIA Report nonetheless); however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this IIA Report, in-line with an interpretation of regulatory requirements

		QUESTIONS ANSWERED	AS PER REGULATIONS... THE IIA REPORT MUST INCLUDE...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the IIA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / IIA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the IIA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by this IIA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table C presents a discussion of more precisely how the information within this report reflects the IIA Report requirements (N.B. to reiterate this report is not the IIA Report).

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the IIA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an 'IIA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA').
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	Messages highlighted through context and baseline review are also presented within Appendix III.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'IIA framework'.</p> <p>The IIA framework is presented within Section 3. Also, messages from context review are presented within Appendix III.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</p>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation), whilst Section 9 presents an appraisal of the Draft Plan. All appraisal work naturally involved giving consideration to the IIA scope, and the need to consider the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the draft plan appraisal presented in Section 9.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	<p>Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain issues / options.</p> <p>Also, Section 7 explains the Council's 'reasons for selecting the preferred option'.</p> <p>Methodology is discussed at various places, ahead of presenting appraisal findings.</p>

Regulatory requirement	Information presented in this report
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The IIA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim IIA Report is published alongside the Draft Plan, in order to inform the current consultation and next steps.
The IIA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim IIA Report will be taken into account when preparing the Proposed Submission Plan, alongside consultation responses received on the Draft Plan and this Interim IIA Report.

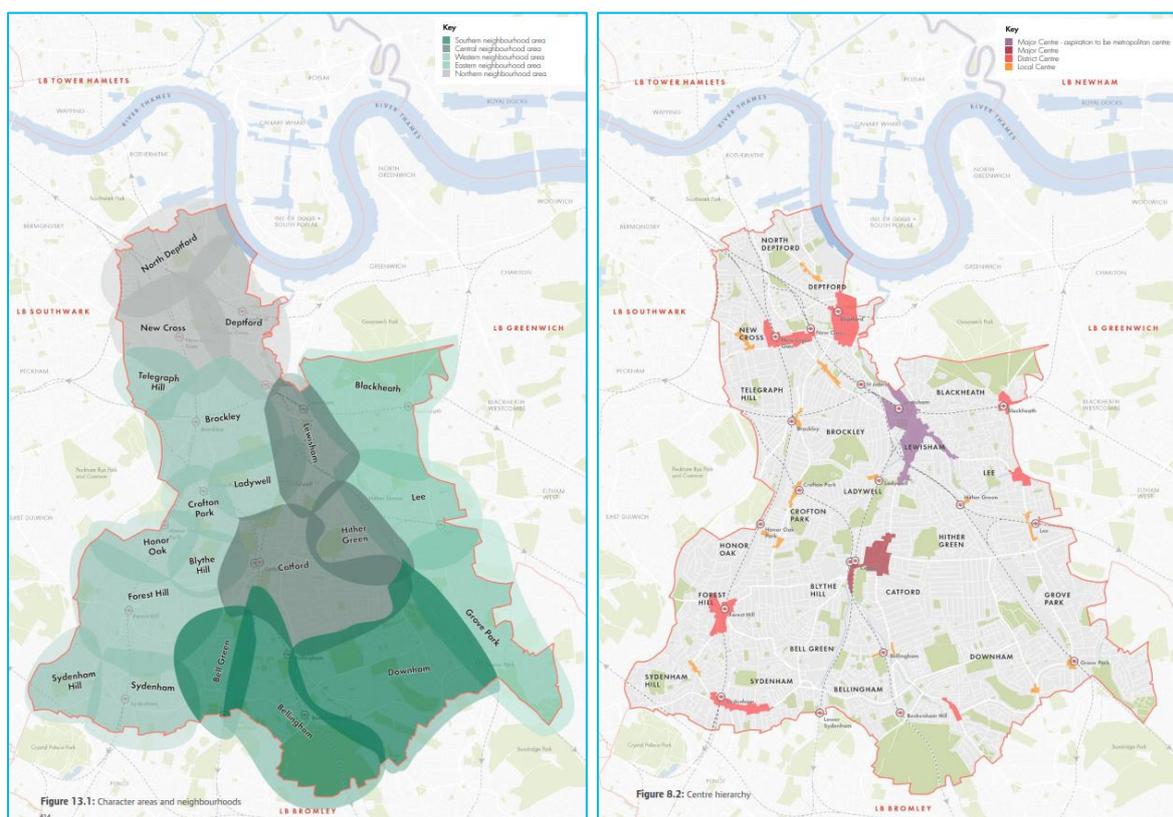
Appendix II: The SA scope

Introduction

As discussed within Section 3, whilst a Scoping Report was published for consultation in 2015, in 2019 the decision was taken to revisit the IIA scope to reflect significant changes to policy context and understanding of key issues locally since the time of the scoping consultation. At the current time comments are welcomed on the IIA scope and any comments received will be taken into account as part of future IIA work, i.e. work subsequent to this consultation / ahead of the Regulation 19 publication stage.

The aim of this appendix is to introduce the IIA scope.

Maps of sub-areas and major / district / local centres in the Borough



Air quality and pollution

Air quality is a significant public health issue in Lewisham and across London. The link between air quality and public health outcomes is well documented. Air pollution is estimated to reduce life expectancy of every person in the UK by an average of 7 to 8 months and in Lewisham, the proportion of all-cause adult mortality attributable to air pollution is 6.5 per cent, which is higher than the national average.

The London Mayor has committed to making air quality in London the best of any major world city. There is also a need to give effect to the NPPF which sets out that local plans should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs).

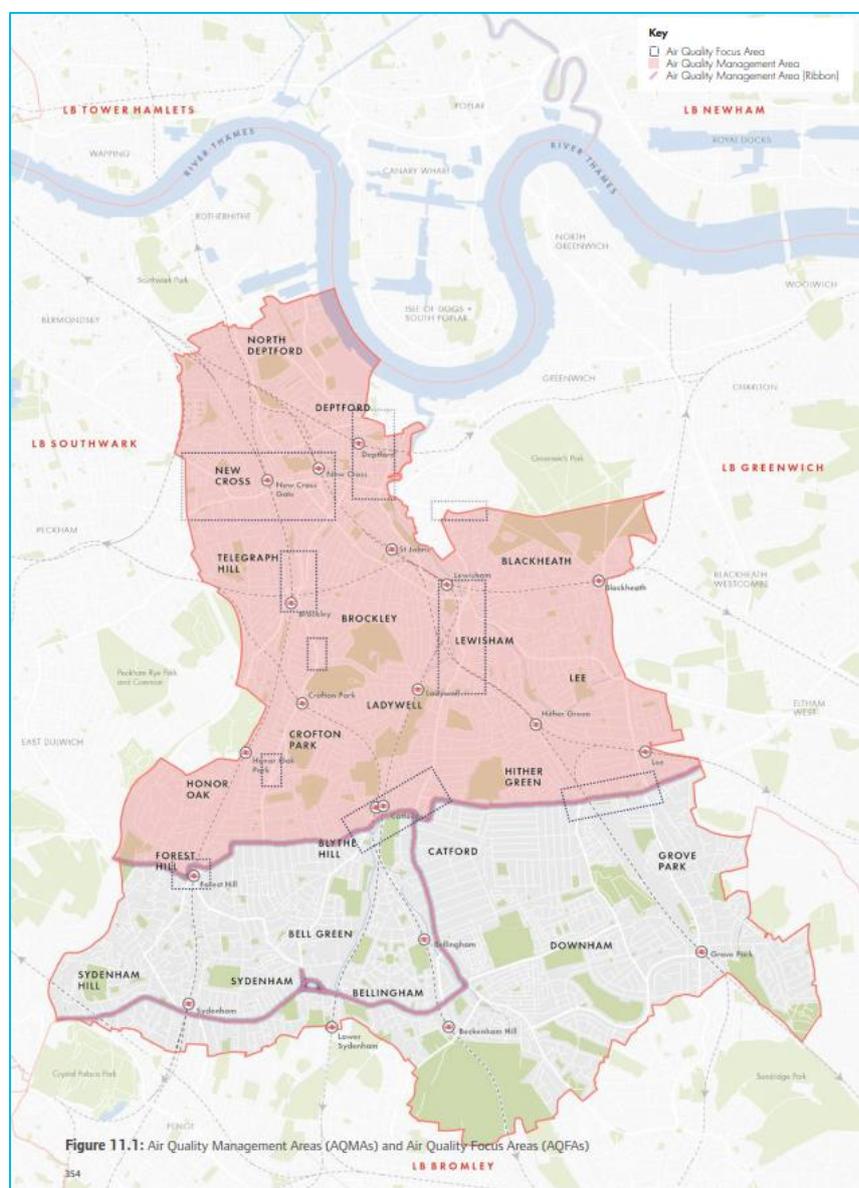
There are currently 6 AQMAs in Lewisham. These cover all the areas north of the A205 (South Circular) together with major roads in the south. The AQMAs have been declared for several pollutants. Monitoring indicates that the Borough is exceeding the EU annual average limit for Nitrogen Dioxide at some locations.

In addition to AQMAs there are also 10 Air Quality Focus Areas (AQFAs) in the Borough; these areas are locations that have been identified as having high levels of pollution and human exposure. Furthermore, whilst the Borough is meeting the EU Limits for Particulate Matter (PM10) it is exceeding the World Health Organisation air quality guideline annual average for this pollutant.

The primary source of air pollution is road traffic, and hence it follows that there is a need for the Local Plan to minimise the need to travel and support a modal shift away from the private car and towards active and public transport.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.*

AQMAs and AQFAs in the Borough



Biodiversity and green infrastructure

Lewisham's network of green and open spaces, waterways and green features (such as parks, street trees and residential gardens) make an important contribution to local character and heritage. They are also integral to supporting sustainable communities and healthy lifestyles, providing a wide range of environmental, social and economic benefits. Green infrastructure should be protected and opportunities taken to enhance provision across the Borough, including by enhancing or creating new links between green infrastructure.

Key strategic opportunities are associated with the river corridors, and in particular the corridor of the River Ravensbourne, which is identified as a Strategic Corridor of London-wide significance by the All London Green Grid Supplementary Planning Guidance.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.*

Elements of the All London Green Grid Framework



Climate change adaptation

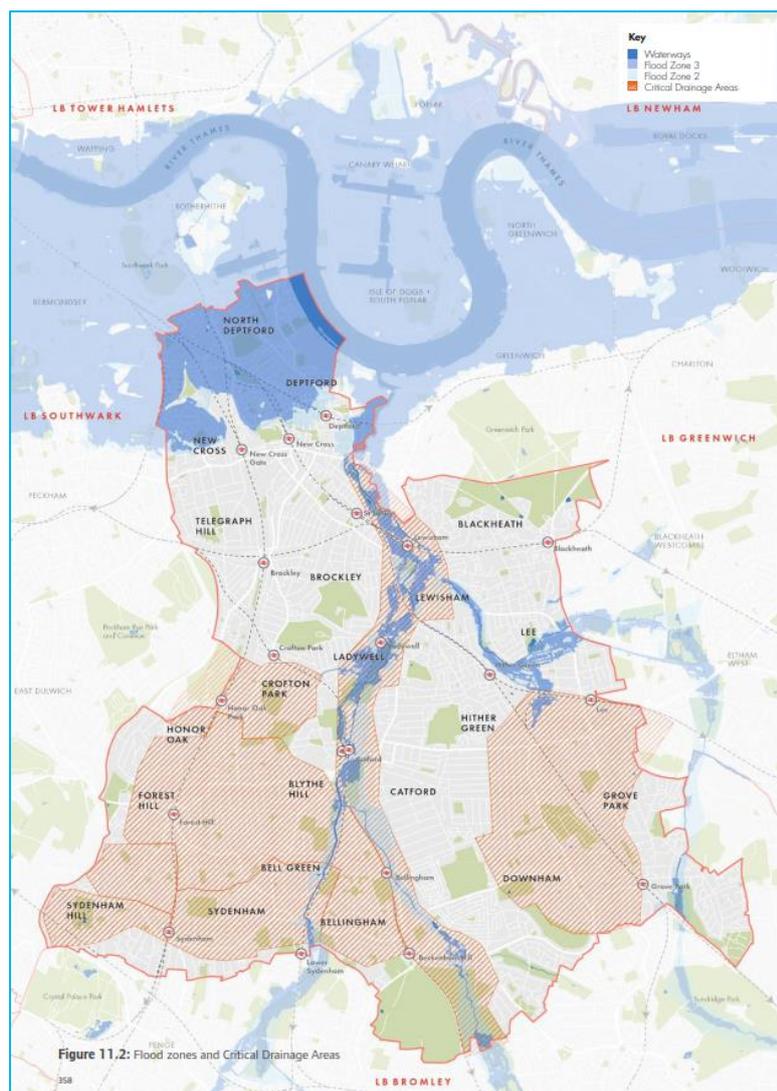
The water environment is a defining feature of Lewisham. The Borough fronts onto the River Thames and the river poses a potential risk of flooding, although the adjacent land area benefits from the River Thames Tidal Defences. Lewisham also falls within most of the catchment of the River Ravensbourne and its tributaries, including the Quaggy, the Pool and Kyd Brook, which outfalls into the River Thames at Deptford Creek. Elsewhere there are localised areas that are at potential risk from other sources of flooding including through surface water run-off, ground water flooding, surcharge from the sewer network and the blockage of culverts and gullies.

The council regularly reviews its Strategic Flood Risk Assessment (SFRA), the latest of which was published in 2019 and includes a Level 1 and Level 2 SFRA. The SFRA maps flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures. Lewisham's Surface Water Management Plan (SWMP) provides additional information on other sources of flood risk.

In line with the NPPF and its associated guidance there is a need to apply a sequential approach to the location of new development. This is in order to ensure that development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. There is a need to consider the appropriateness of proposed uses within the different flood zones having regard to Flood Risk Assessments (FRAs) submitted by applicants, albeit there is an inherent challenge in that FRAs will not always be available to inform the Local Plan.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.*

Flood risk zones



Climate change mitigation

Lewisham is committed to tackling climate change and declared a 'climate emergency' in February 2019. The Borough is also committed to playing its part in realising the draft London Plan objective for London to become a zero carbon city by 2050.

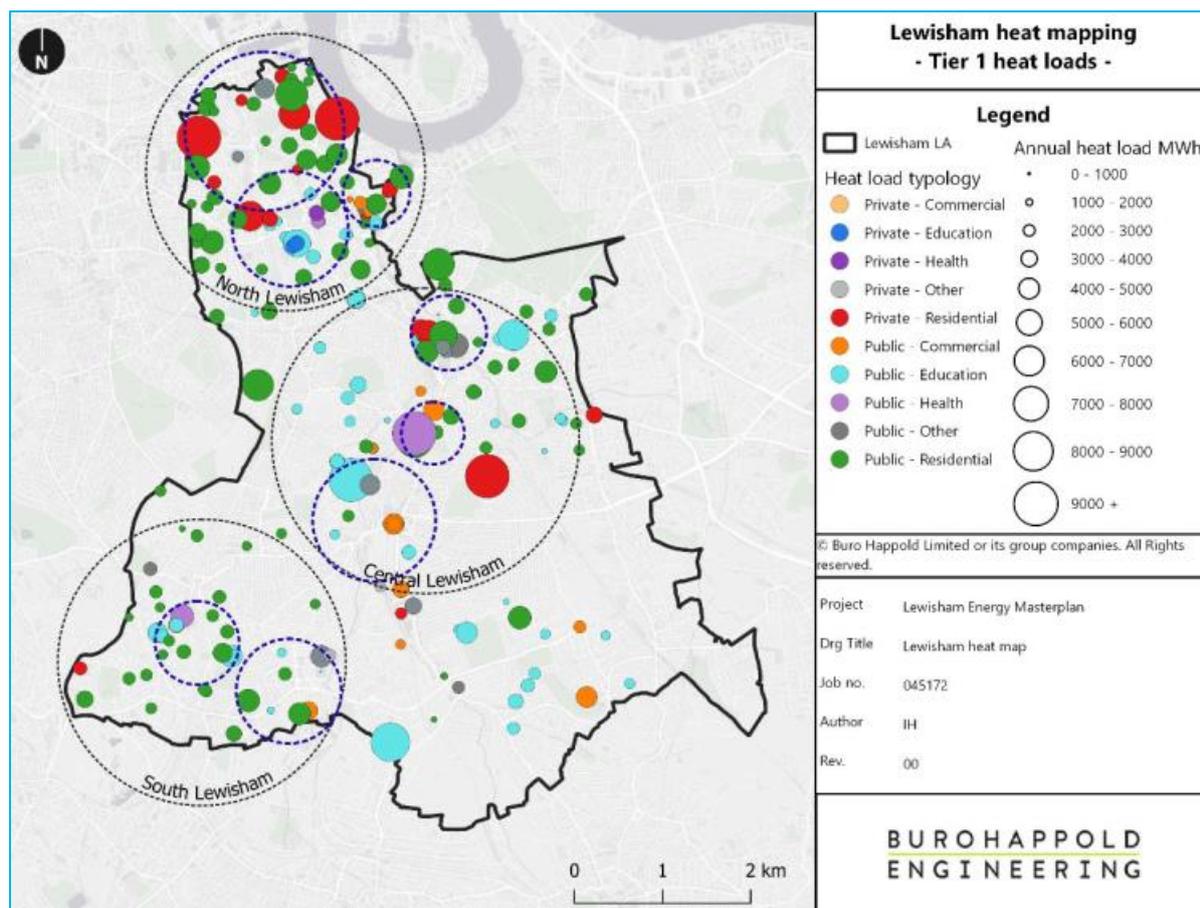
There is broadly a need to focus attention on (average per capita, as opposed to total) emissions from transport and the built environment, with it being appropriate to focus on the latter matter here, under the 'Climate change mitigation' banner, recognising that emissions from transport is a highly cross-cutting matter.

In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of small scale and micro power generation, e.g. solar panels). Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means:

- Proximity to a strategic heat source, which can be heat at high temperature from CHP, industry or waste management, or heat at low temperature from the ground or water, given heat pump technologies;
- Proximity to a major source of heat demand (also cooling), such as a civic building; and
- Support for strategic-scale mixed use schemes that achieve economies of scale and lead to a balanced heat demand profile.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).*

Areas with a high density of heat demand³⁶



Communities 1: Accessibility

The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a 19% population growth between 2017 and 2040. This will likely put further pressure on local services and infrastructure, and may exacerbate issues around access to high quality housing and affordability. At the same time, there are likely to be new opportunities and local benefits arising from growth, for example, through the revitalisation and regeneration of town centres, renewal of employment land and greater investment in services and strategic infrastructure, particularly transport infrastructure.

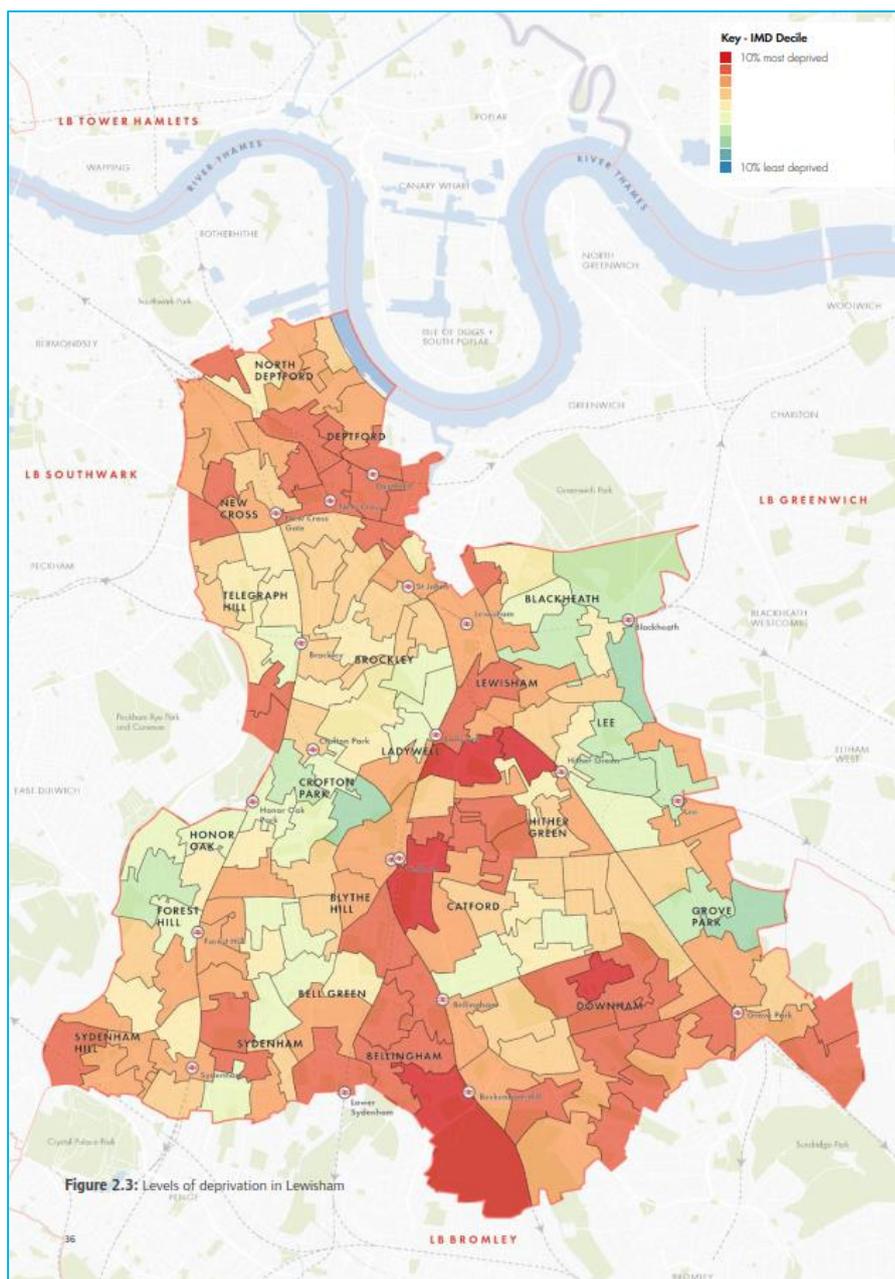
There has been significant investment in recent years in many parts of Lewisham. This has largely been concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas.

Whilst levels of deprivation have improved recently Lewisham remains within the 20% most deprived local authorities in England, and is the tenth most deprived London Borough. It has the highest proportion of children and young people, and older people in economic deprivation in the country. There are also pronounced concentrations of deprivation in many local areas. Life expectancy across Lewisham is comparable to the London average, however in the most deprived areas life expectancy is 6.1 years lower for males and 5.1 years lower for females. Future investment will need to consider these inequalities and varied geographies of deprivation

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.*

³⁶ This figure is sourced from an early draft of the emerging Lewisham Energy Masterplan. The findings of the emerging Masterplan were otherwise not available to inform this Interim IIA Report.

Areas of relative deprivation



Communities 2: Housing

Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Median house prices in Lewisham have risen over 310% from £99,995 in 2000 to £412,000 in 2017. Whilst monthly private rental prices have remained relatively low, median rental prices increased 35% from 2010 to 2017 (London average 14%). In 2017 average private rents were 43% of average household incomes.

The draft London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the region. In order to address the identified needs, it sets out 10-year housing targets for all boroughs. Lewisham’s target is 16,670 net housing completions (or 1,667 net new homes per year). Alternatively, a Local Housing Need (LHN) figure for the Borough is calculated using the method set out in national policy. This method suggests that the minimum housing need is up to 2,964 net units per year.

There is also a need to meet needs for affordable and specialist housing, and to ensure that the required mix of housing is delivered and that housing is built to appropriate standards, including in respect of space standards.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.*

Communities 3: Wider issues

There is a pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to positively seek to ensure equality of opportunity, especially for those living in the Borough's most deprived areas.

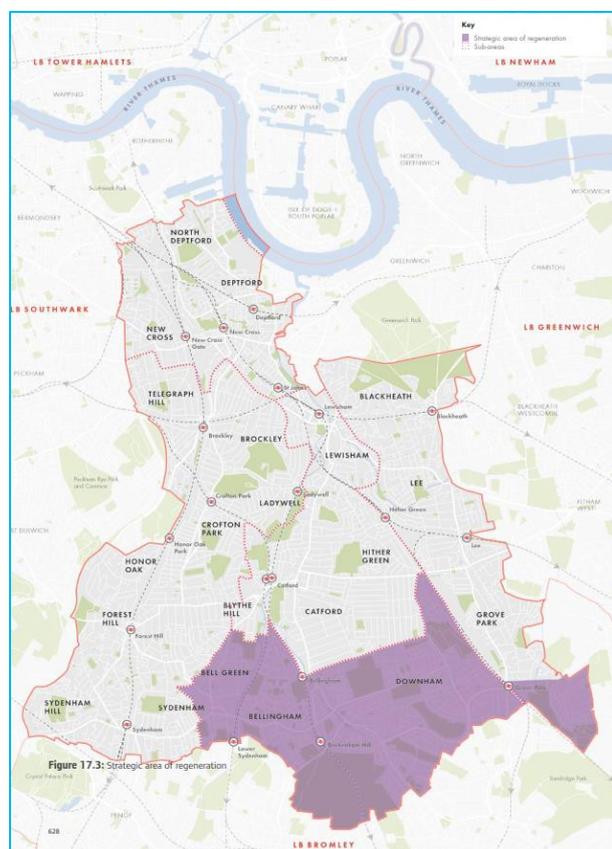
Issues are wide-ranging, inter-related / cross-cutting and complex. The following list of Local Plan objectives, amongst others, serves to illustrate this point:

- Sustain and create inclusive communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham.
- 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.
- Promote cohesive and liveable communities by ensuring mixed and balanced neighbourhoods where development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
- Create safer communities and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.

Under this heading of 'Wider issues' there is a need to give consideration to communities-related issues and opportunities that are not more appropriately dealt with under another IIA Framework heading. As part of this there is a need to ensure that consideration is given to the potential for the Local Plan to impact groups with protected characteristics under the Equality Act 2010, although it is inherently challenging to establish a significant cause-effect relationship, between the Local Plan and protected characteristic groups, where the group is not known to be geographically concentrated, or known to be closely associated with a particular type of land use being addressed through the Local Plan.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.*

The Strategic Area of Regeneration



Economy

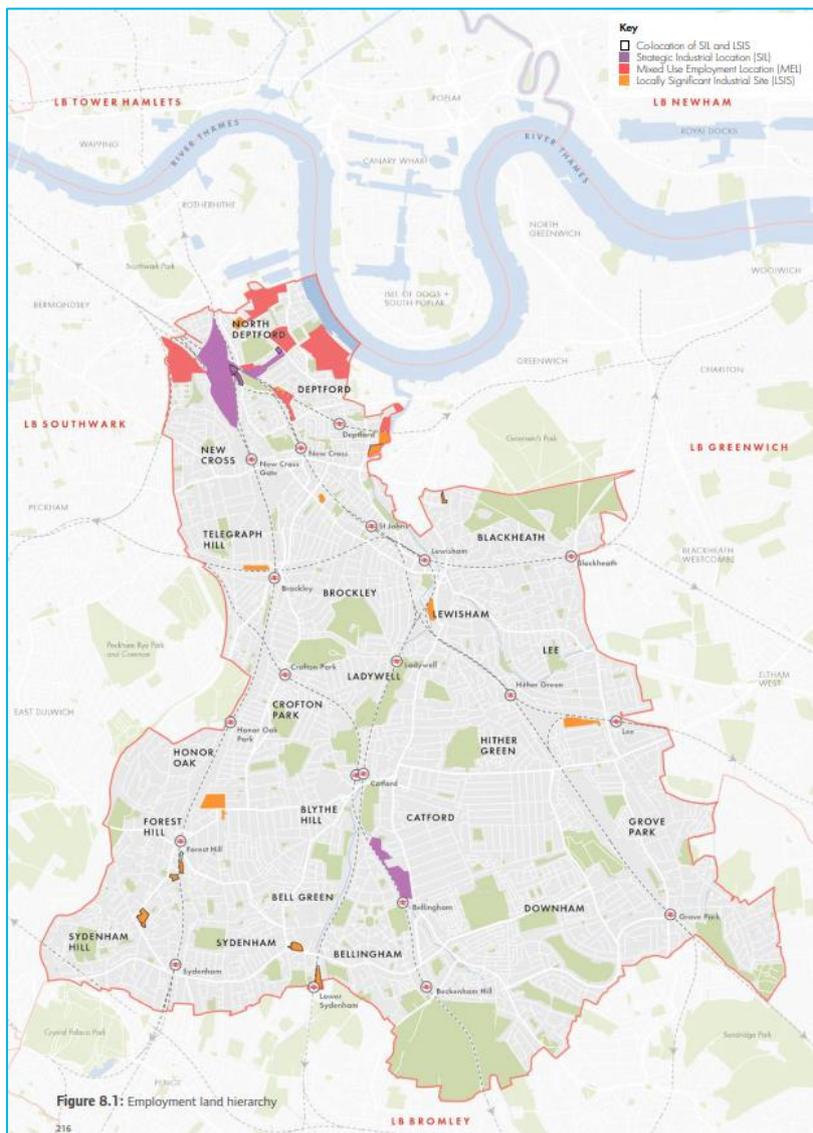
Industrial and commercial activity is largely focussed towards the Borough’s designated employment locations and town centres, including two London Plan Strategic Industrial Locations (SIL). A plan-led process of industrial land consolidation has been facilitated by the council over recent years, particularly to support strategic regeneration projects. However, a significant amount of employment land and floorspace has also been lost through piecemeal development, aided by the introduction of new permitted development rights. Whilst local employment sites are under increasing pressure for change of use, there is a tight supply of industrial land and relatively healthy industrial market, with a strong demand for workspace, low vacancy rates, and limited availability at key locations.

The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern. The use of multi-channel (on-line) shopping is changing the way in which people use centres.

Evidence shows that there is a need to secure additional retail and employment floorspace in Lewisham. Over the next 15 years, there is an estimated demand for approximately 14,500 net additional square metres of retail floorspace and 15,000 net additional square metres of employment floorspace. By planning to meet this need, the Local Plan help to address the economic issues facing high streets and support the evolving role of town centres as leisure and entertainment destinations. There is also a need to support an an increase in local jobs, meet the particular employment needs of local communities, including those with lower skills, and assist in growing the creative and digital industry clusters.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.*

Designated employment land



Historic environment, heritage, character and culture

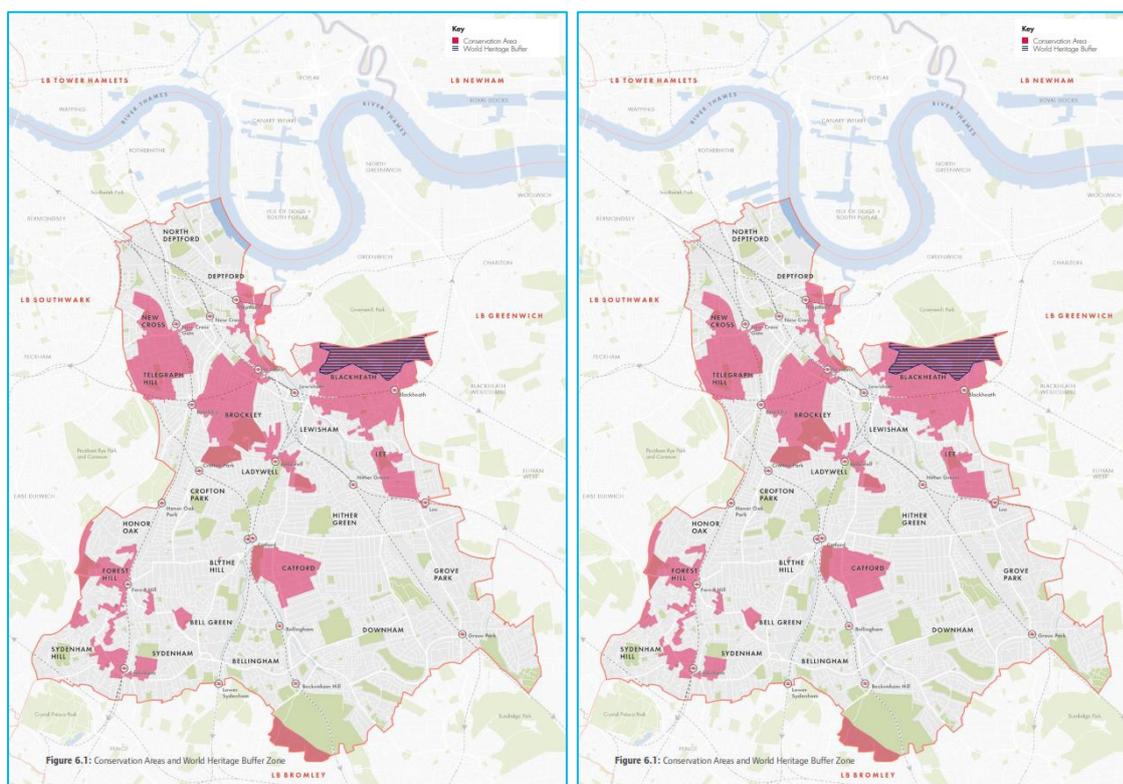
Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history, which the Lewisham Characterisation Study (2019) breaks down into six periods: Ancient Lewisham (pre-1700s); Town and country (1700-1800); Unlocking the south (1800s-1850s); Rise of the commuter suburbs (1860-1914); Interwar (1915-1949); and Rebuilding Lewisham (1950s onwards). Settlement firstly followed the river valley as far as Catford, before higher land was developed in the mid-1800s.

Lewisham's diverse history is reflected in the historic environment that features over 600 statutory listed buildings, 29 conservation areas, as well as Lewisham's varied and vibrant cultural scene.

To accommodate growth and investment in a coordinated manner the Local Plan will need to carefully consider the existing assets, the wider character of local places and neighbourhoods, and the mixed and diverse communities that make Lewisham so unique.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.*

Designated conservation areas and archaeological priority areas



Land and natural resources

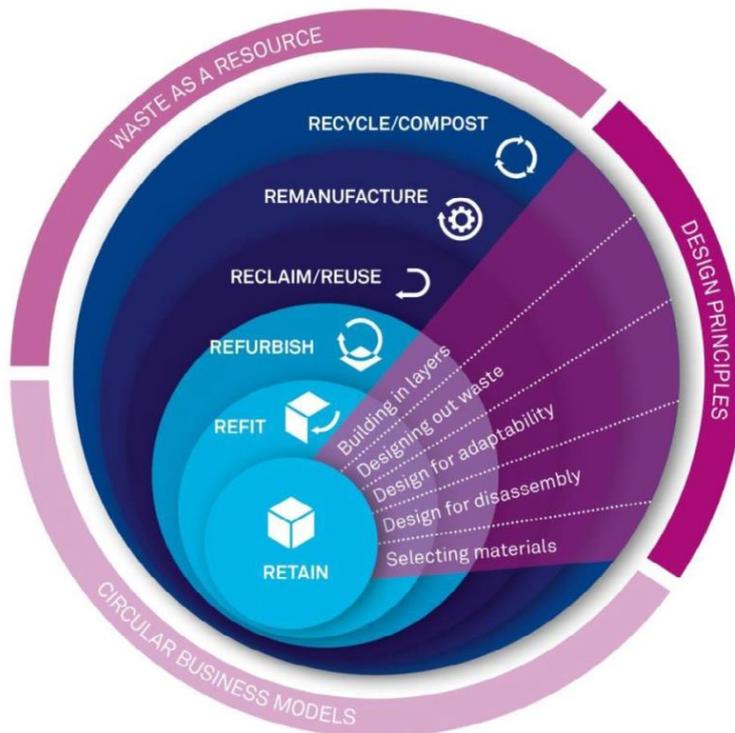
The draft London Plan advocates the 'circular economy' as a strategic approach to the sustainable use and management of materials and waste. The circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. There is the potential to implement circular economy principles at the design and construction stages of development, as well as during the operational lifetime of development.

The draft London Plan also includes a strategic objective for London to be net waste self-sufficient by 2026. This means that all waste generated in the city should also be managed within it, rather than being exported elsewhere. To support this objective the London Plan apportions a per cent share of London's total waste to be managed by each Borough, which is set out in tonnes. It then requires Boroughs to allocate sufficient land or sites, and identify facilities, to manage the apportioned tonnages of waste. This means that the Borough must pool and manage the waste apportionment within its sub-region, working in partnership with other local authorities in the South East London Joint Waste Planning Group. The South East London Joint Waste Technical Paper provides further details on the pooled apportionment and strategic sites with capacity to manage this over the long-term.

Aside from waste management / supporting a circular economy, there is a need to make best use of land as a natural resource, which means prioritising brownfield land for development optimising development densities. All large areas of greenfield land in Lewisham are designated, and hence not likely to come under pressure for development; however, there is also a need to consider greenfield 'backland development' and 'garden grabbing'.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.*

Circular economy principles



Transport

Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer infrastructure and lower public transport coverage. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. Daily cycle trips are at a comparable level to inner-London.

To achieve a successful multi-centred Borough it is vital that there are legible, high quality, safe and efficient routes both to and between town centres and neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. The future prospects and viability of Lewisham's town centres will rely heavily on their capability to be accessed safely and easily by all residents, workers and visitors. Also, with a well-connected town centre network, individual centres will be better placed to sustain or evolve their specific roles as the population is enabled to use them with more regularity.

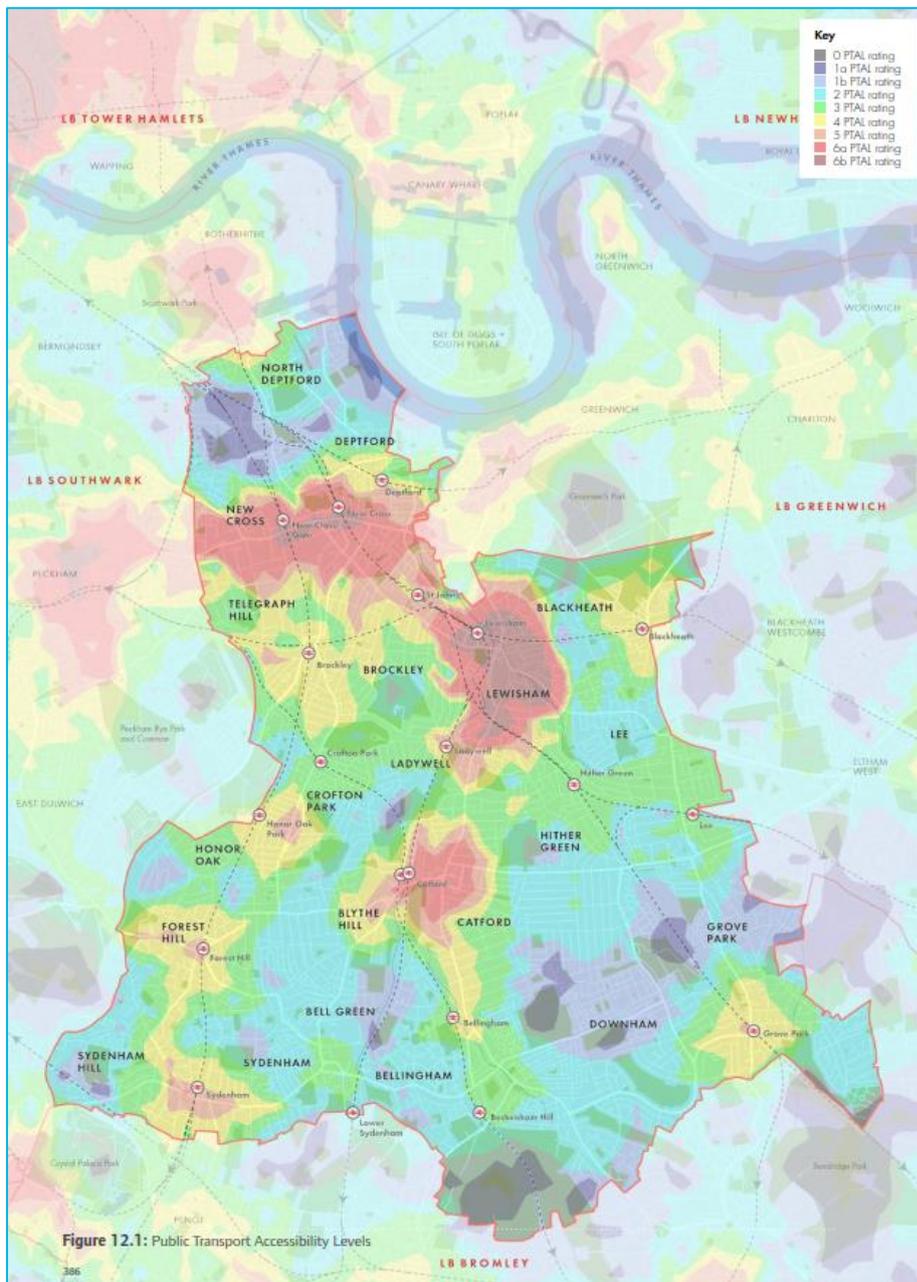
The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road). Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary. These roads include: the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon).

At present these strategic roads prioritise vehicular flows, or their ‘link’ function, above any ‘place’ function and potential contribution they may make to the quality of the neighbourhoods and centres they connect with and move through. In addition, the particular qualities of the strategic roads (such as their width and environmental quality) means that they possess their own spatial character as ‘corridors’ and can therefore appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity. Furthermore, the quality and functionality of these corridors can be improved through development delivering on the Healthy Streets principles, giving priority to pedestrians and cyclists.

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

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.*

Public transport accessibility (PTAL) levels



Appendix III: EqIA

Introduction

As discussed within Section 3.3:

- The Equality Act 2010 (the Act) introduced a public sector equality duty. It covers the following protected characteristics: age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race (including nationality and ethnic origin), religion or belief, sex (male/female) and sexual orientation.
- Under the duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.
- Equalities issues and impacts are considered under all of the IIA framework topic headings, and a stand-alone discussion (integrated with health considerations) is presented under the “Communities (Wider issues)” heading. A further stand-alone discussion is presented in this appendix.
- However, it is inherently challenging to identify a cause-effect relationship between Local Plan interventions on one hand and equalities issues on the other, given uncertainty regarding the ‘on the ground’ implications of strategic interventions and uncertainty in respect of how equalities issues vary spatially. In many cases there is a lack of evidence to show how groups with protected characteristic groups are geographically spread/concentrated, or to show that groups have a particular association with one or more of the types of land use being addressed through the Local Plan.
- One important step that can be taken through the Local Plan is to focus efforts on addressing areas and smaller pockets of relative deprivation, which can be identified using readily available data sources. This approach reflects an understanding that there is a strong link between relative deprivation and equality of opportunity for groups with protected characteristics under the Equalities Act 2010.³⁷

Having made these initial points, the following two headings:

- Present an initial screening of protected characteristic groups; and then
- Give consideration to key Local Plan EqIA issues/impacts.

Screening protected characteristic groups

The protected characteristic groups most relevant to Local Plan-making are age, gender, disability, race/ethnicity and religion/belief. This is on the basis that there can be evidence or, more generally, some understanding, of how groups with these protected characteristics associate with particular areas within the Borough, or particular types of land use set to be addressed via the Local Plan. Notably –

- The elderly and disabled – can have particular accommodation needs that can require allocation and/or development management policy through the Local Plan, and can also have mobility needs that must be taken into account when selecting sites for allocation, assigning indicative development densities and considering required upgrades to transport infrastructure and the urban realm. Pregnant women and mothers with young children can also have similar requirements in respect of transport infrastructure and the urban realm.
- Children and young people – the Covid-19 pandemic has served to highlight the importance of access to green / outdoor playspace for children, plus there are concerns regarding how the pandemic is affecting young people’s education (including concerns around online learning) and training/career opportunities. There is an epidemic of anxiety and mental health issues facing young people from the uncertainty of their futures and plan making may need to adjust to accommodate more home based / remote / online learning and working going forward. There is also a need to consider community space for remote learning / working.
- Gender can affect inequalities. For example, life expectancy is 5.8 years lower for men and 3.4 years lower for women in the most deprived areas of Lewisham than in the least deprived areas.

³⁷ The Measuring Poverty Report (2019) found, amongst other things, that: nearly half (46%) of people in families with a Black head of household and 37% of people in families with an Asian head of household are in poverty, compared to 19% of people in a family with a White head of household; and nearly half (48%) of people in poverty – totalling 6.8 million people – live in a family where someone is disabled. See <https://socialmetricscommission.org.uk/>

- Race, ethnicity and religion/belief groups can be associated with particular geographic locations within the Borough, although data can be limited (or potentially somewhat out of date, as it is based on the 2011 Census), and can also be associated with particular housing issues / needs. Groups may also be associated with certain employment sectors and areas with concentrations of certain types of businesses, including markets and areas with low rents that support small family businesses. With the Covid-19 pandemic in mind, it is also important to note that health impacts will be experienced differently by different people and communities, and there are strong links between social equity, race and health. There is evidence that Black and Minority Ethnic communities are at greater risk of dying from Covid-19.³⁸ This is also true for people living in deprived areas, demonstrating the close link between social inequity and health inequalities.

Other protected characteristic groups are of more limited relevance to the Local Plan. To reiterate, this is on the basis that there is no evidence, or understanding, of how groups with these protected characteristics associate with particular areas within the Borough, or particular types of land use set to be addressed via the Local Plan.

Key equalities issues/impacts

The discussion below is first and foremost a summary of issues/impacts discussed within Section 9 of this report. The opportunity is also taken to present an expanded discussion in respect of certain key issues, and to sign-post to sources of evidence.

Air and noise pollution

Air quality is an important equality consideration, including because: there can be a correlation between poor air quality and relative deprivation, and also between poor air quality and locations associated with a prevalence of particular ethnic groups;³⁹ and people with chronic health problems are among the most vulnerable to air 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' (including taxis) amongst the Borough's residents and, in turn, minimise traffic and associated air pollution.

Further considerations relate to ensuring a high quality public realm. The recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects).⁴⁰ The Local Plan spatial strategy is strongly focused on delivering targeted enhancements to the urban realm in Lewisham and (in particular) Catford and along the A21 corridor; and there is also a focus on improving access to the rivers and open space (which tend to be geographically close to transport corridors and, indeed, suffer from severance by road and rail).

Green infrastructure

There is a growing body of evidence on the health benefits of access to good quality green spaces, and it can also bring other benefits such as greater community cohesion and reduced social isolation.⁴¹ Additionally, the Covid-19 pandemic has demonstrated the need for access to greenspace in order to ensure mental and physical well-being, especially for those living in homes without gardens or private greenspaces.

The Local Plan spatial strategy is strongly focused on the central transport corridor that is also a river valley and strategic green infrastructure corridor. There will be opportunities to greatly improve access to green and blue infrastructure, including delivering high quality areas and routes that are accessible and appealing to different groups and communities, including those with mobility issues; however, it is not clear that there will be the opportunity to deliver any new areas of larger open space.

³⁸ See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

³⁹ See https://www.london.gov.uk/sites/default/files/aether_updated_london_air_pollution_exposure_final.pdf (in particular, see conclusions on page 37)

⁴⁰ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

⁴¹ See <https://www.gov.uk/government/publications/local-action-on-health-inequalities-evidence-papers>

Flood risk

Areas of relative deprivation can tend to be disproportionately affected by flood risk,⁴² and hence there is a need to consider whether the Local Plan could, to some extent, be perpetuating this issue by allocating a number of sites in the flood risk zone. Whilst there is little reason to suggest that house prices of new developments in the flood risk zone will be lower than typical market rates for the area, were a development to be affected by one or more flood risk events this could decrease house prices. There is also a need to consider the increased vulnerability to flooding events of individuals with more limited mobility.

Housing density / tall buildings

The Local Plan seeks to support higher densities in certain targeted locations, in accordance with the London Plan SHLAA standard methodology, and taller buildings in certain locations as a means of achieving higher density whilst at the same time ensuring sufficient land for associated open space and other uses. Higher density development and taller buildings could potentially lead to challenges in the future under a scenario whereby there is an increased prevalence of heat waves and extreme rainfall events, and there is also a need to consider the importance of ease of access to open and green space during any future pandemic akin to Covid 19. The elderly and disabled people can be susceptible to high temperatures and may have mobility issues that create challenges in respect of accessing open and green space. There can be similar challenges for pregnant women and for parents of babies and young children.

Heat pumps and heat networks

The Local Plan is a primary opportunity to support the transition away from gas and towards the electrification of heating. However, there are equalities considerations, as there is a risk of higher costs being passed onto the consumer, thereby exacerbating issues of fuel poverty. It is also important to note that the Covid-19 crisis has led to increased home working and, in turn, increased home energy consumption, potentially leading to fuel poverty becoming a more widespread issue. It is therefore imperative that the transition to heat pumps is coupled with efficiency measures to reduce demand. Focusing on heat networks, this matter is a key focus of the Heat Trust, who offer a certification scheme that aims to ensure that consumers are protected. The Heat Trust explain:⁴³

“The heat network sector is diverse, with thousands of individual heat network providers, of all shapes and sizes, but the market is currently unregulated... Consumer protection is essential to the long-term success of heat networks. We’re putting in place the foundations of regulations that will protect customers while allowing this exciting new industry to flourish.”

Strategic Area of Regeneration

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, where relative deprivation is closely linked to accessibility, with the Local Plan explaining: *“The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of development sites.”* However, at the current time there remains a degree of uncertainty in respect of how far east, into the Strategic Area of Regeneration, the benefits of strategic growth at Bell Green / Lower Sydenham would be felt.

Catford town centre regeneration

The scale of change will have significant implications for existing communities and businesses in the area, which the emerging Masterplan describes as being associated with *“an established community with a strong sense of identity”* and an *“informality that is a draw and a comfort for many.”* Whilst it is not the aim of this IIA to assess the emerging masterplan, key points to note include:

⁴² See, for example, assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/291064/scho0905bjol-e-e.pdf and assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/292928/geho0609bqds-e-e.pdf

⁴³ See heattrust.org/about

- Overall strategy – there is certainly a need for regeneration, given a range of specific issues, notably: the dominance of the South Circular/Catford Road and surrounding road network, which has a major impact on environmental quality and the cohesiveness of the town centre; a poor sense of arrival into the town centre; a shopping mall that is hidden and inward-looking and provides a limited retail offer; Milford Towers that are in a poor state of repair; and a dispersed and poorly linked set of Council offices that would benefit from being reconfigured and consolidated. The broad proposal to deliver a new cultural and civic hub and surrounding retail area is also supported, as are ambition statements including: *“The ambition is to reinforce Catford’s point of difference as a cultural destination and to improve and diversify the leisure offer and the night-time economy...”* However, there is potentially a need for further work to understand the nature of existing communities and businesses, and how they will be able to adapt and thrive during and following the regeneration.
- The Yards – this area is described as hosting “an eclectic mix of buildings from different eras”, which could, in turn, suggest that this area is associated with community and business diversity, although it is recognised that the overall conclusion reached by the Masterplan is that: *“The area as a whole is underutilised and underdeveloped”*. The objective for the area is *“to become a creative and entrepreneurial cluster for Catford’s existing and future independent businesses, providing a range of spaces with a street presence”* and the proposal to deliver *“external yard spaces [that are hard working and durable, and function as open air workshops for construction, creation and recreation”*. This is supported, from an equalities perspective; however, it is recommended that further consideration is given to avoiding and mitigating impacts to existing communities and businesses.
- The Lanes – the emerging Masterplan notes that: *“Decanting of residents and shop owners has already started, and meanwhile uses such as Catford Mews are now activating the shopping centre until its phased demolition.”* If there are lessons to be learned from early work dealing with existing businesses and communities then it will be important that these feed-into the Local Plan and Masterplan.

The BLE LEIA (2020) explores the potential to enhance the economy of Catford, highlighting that the town centre is associated with low levels of employment in knowledge, which is certainly an issue to be addressed. The downside could be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *“Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase, existing sites are redeveloped, and the economy shifts to higher value employment.”* However, given the low baseline, in respect of knowledge industry jobs, there are limited concerns. Also, concerns are allayed given Local Plan support for increased delivery of affordable workspace, with the LEIA suggesting: *“The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate.”* The LEIA also suggests: *“extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses.”* Also of note are the following policy requirements, proposed for the Catford Shopping Centre and Plassy Road Island proposed allocations respectively:

“Buildings should provide for a range of footprint sizes to accommodate a variety of town centre, commercial and community uses, and be designed to provide flexibility to enable sub-division of units.”

“Retail and commercial elements should reflect the site’s immediate town centre context, providing a mix of unit sizes and workspaces to support a wide range of uses and businesses.”

District centre regeneration

A stand-out opportunity is associated with Lee Green borough 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. It will be important to ensure that the sites are masterplanned as a whole as far as possible, albeit this may be a challenge given the current application for Leegate Shopping Centre.

There is also a notable opportunity at Grove Park local centre, which serves both Grove Park to the east and Downham to the west. Downham falls within the Strategic Area of Regeneration and Grove Park is also associated with certain issue, with the Local Plan explaining: *“Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular...”* The proposed allocation, which is known as “Sainsbury Local and West of Grove Park Station” comprises of a number of sites located within Grove Park local centre, which are currently occupied by a range of uses. An ambitious approach is proposed in respect of assembling sites in order to deliver a comprehensive (albeit small scale; net 78 homes) redevelopment to support the long-term vitality and viability of the local centre.

A final important consideration is the need to accommodate increasing numbers of people, including young people, undertaking remote/online learning, training and employment opportunities, particularly for people who lack sufficient space within the home. It is recommended that this should be a focus of work around town and district centre regeneration, as part of plan finalisation.

Existing community facilities

As per the Local Plan, community facilities are essential to health and wellbeing. Safeguarding and securing community infrastructure is an important way to ensure local communities have access to affordable, high quality facilities, especially in deprived areas. Redevelopment of existing community facilities should be approached with care. Where there is an identified need, it is crucial that important community facilities and services are not lost during redevelopment process since the resulting impact on the health and wellbeing local communities could be serious, especially following the end of Covid-19. The Local Plan provides a clear policy direction in terms of the redevelopment and/or re-purposing of community facilities, where proposals are demonstrably linked to investment programme as part of the one public sector estate.

Notable sites where the proposal is for mixed use redevelopment of existing community facilities are:

- Sydenham Green Group Practice comprises an existing large health centre adjacent to the proposed BGLS strategic growth area; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure.
- Jenner Health Centre, in the west of the Borough, does not fall within a strategic growth area, hence there is less to be gained by redevelopment, relative to the Sydenham Green Group Practice site; however, it is again fair to assume that health infrastructure will be sufficiently re-provided as part of the redevelopment, hence there are limited concerns and, indeed, potentially no concerns beyond short term impacts during the construction phase.
- Riverside Youth Club and 2000 Community Centre, in the north of the Borough, with site specific policy requiring: "The operational requirements of the retail and community/leisure uses across the site should be taken into account."
- Catford Policy Station - there are no concerns in this regard, as it is certainly fair to assume that policy operational capacity will not be unduly impacted by allocation and redevelopment of the site (and this is a stated requirement within site-specific policy).

Also, there is a need to note the strategy in respect of mixed use redevelopment of out-of-centre retail facilities, notably Ravensbourne Retail Park, Bell Green Retail Park, Homebase/Argos Bromley Road and Bestway Cash and Carry. Other commercial uses are also set to be lost, including car servicing and builder's merchants, and several car parks are proposed for redevelopment; however, in the great majority of cases there is a clear strategic argument for redevelopment that extends well beyond simply housing delivery.

Housing

Access to high quality housing, including family housing, affordable housing and specialist housing, is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.⁴⁴ Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

Whilst there is uncertainty at this stage in the planning process regarding the capacity of certain of the proposed allocations, the assumption is that the Plan would meet and modestly exceed the target established by the draft New London Plan (as currently understood),¹⁶ whilst there will be the potential to close the gap' between housing supply and Local Housing Need (LHN), as understood from the Lewisham Strategic Housing Market Assessment (SHMA, 2019), under a BLE Phase 2 scenario.

With regards to affordable housing, an ambitious approach is proposed involving 50% affordable housing and application of a locally specific definition of affordable housing; however, there will be a need for further work to confirm the viability of this approach, also taking into account the costs of additional financial burdens that will be placed on developers, relating to wide ranging other policy objectives.

⁴⁴ See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

It is important to consider the impacts of the Covid-19 pandemic on house prices and affordability. Given house prices are likely to fall in the short term, affordability at the margins is thus likely to improve. However, since access to home ownership is determined by factors such as job security, income and access to credit, the temporarily decline in prices is unlikely to improve affordability in general. Furthermore, in terms of renting, especially in the Private Rented Sector (PRS), rental prices are likely to increase as a larger number of households will be unable to access home ownership, including affordable home ownership products, in the short term. The overall demand for rented housing could increase in the short term and increasing rents may impact several households over the course of the pandemic, and long after it ends. This might also have disproportionate impact on BAME groups that are more likely to rent in the social rented sector and could face increasing costs.

The regeneration of Catford town centre could prove a key focus area, in respect of meeting affordable housing needs. The BLE LEIA (2020) that under a BLE scenario house prices locally will increase in the vicinity of BLE station, thereby leading to more residents in need of affordable housing, which, in turn, suggests a need to support a higher housing growth strategy locally. The LEIA identifies that within Catford: *“Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing.”*

Provision for specialist housing needs is another consideration, although this is a focus of only one of the proposed allocations, namely Featherstone Lodge, Eliot Bank, which is proposed for older person’s accommodation. Other specialist housing needs are dealt with through development management policy, but there will be a need for further work ahead of plan finalisation to confirm that there is not a need for the Local Plan to take a more proactive approach through site allocation. It is also worth considering how, in light of the Covid-19 Pandemic, it may be the case that older people are more likely to want to remain in their own homes instead of living in care homes given both the recent funding crisis in the care sector and the rise in virus related deaths in care homes. Furthermore, for those that might still want to access specialist housing, the experiences of pandemic isolation could lead to a greater demand of certain attributes in the types of housing: people are likely to *need* spacious homes, homes located near green space, homes equipped with smart technology (for those who cannot access carers), and homes located close to community support networks in order to ensure their physical and mental well-being. These factors isolation might affect site allocation for specialist housing, and commercial housing developments in general.

Mixed use redevelopment of industrial land

The Local Plan includes a focus on mixed use redevelopment of existing employment sites, with the firm intention that: *“Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location.”* There will be a need to take steps to confirm that the Local Plan will not lead to a loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being *“characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.”*

Estate regeneration

Estate regeneration is a focus of three of the proposed allocations; however, two of the three allocations are committed, and indeed currently building-out. As for the uncommitted proposed allocation – Achilles Street – residents voted in support of estate regeneration in late 2019, such that the question for the Local Plan is now how it should happen, including in terms of development quantum. A net increase of 497 homes is proposed at this 1.4 ha site, which is an ambitious quantum that will require tall buildings, yet details are not currently set out in the site specific policy. There may be a need to explore options further ahead of plan finalisation.

Waste management

One final consideration relates to putting in place measures within developments to support waste management. Consideration should be given to challenges that might be experienced by the elderly, disabled people and those with more limited mobility.

Appendix IV: DM Policy Alternatives

Introduction

The aim of this appendix is to present a 'high-level' assessment of reasonable alternatives for a select range of development management (DM) policy areas/issues, complementing the assessment of growth scenarios that is a focus of Part 1 of this report.

The alternatives examined within this appendix are summarised in Table 1, and then Tables 2 – 11 present assessment findings. Table 12 then presents a summary of assessment findings, and the Council's response to each of the assessments in turn.

Table 1: The DM policy alternatives appraised in this appendix

Section of the plan	Policy issue	Discussion of reasonable alternatives
High quality design	Optimising site capacity	<ul style="list-style-type: none"> The emerging preferred option is to require individual planning applications to demonstrate that a “design-led approach” has been taken, whereby density is optimised having required to a range of factors established through policy. An alternative approach would involve taking a more prescriptive approach, with density ranges set for new developments in different areas or locations.
	Tall buildings	<ul style="list-style-type: none"> The emerging preferred option is to only allow tall buildings in specific locations, and to assess proposals in line with criteria in Policy D9 of the Intend to Publish London Plan (2019) An alternative approach would to only allow tall buildings in specific locations, and to assess proposals in line with Policy D9 of the Intend to Publish London Plan (2019), along with setting maximum limits on building heights
Housing	Affordable housing	<ul style="list-style-type: none"> The emerging preferred option sets a target of 50% of all new homes built to be 'genuinely affordable', which is defined as housing at social rent levels (which is set on the basis of local income levels); this means that intermediate and market housing products would not be considered as genuinely affordable. An alternative approach would involve using the standard definition for affordable housing, as set out at Policy H6 of the Intend to Publish version of the new London Plan (2019), which includes intermediate products. <p>N.B. the focus here is on affordable housing delivery at large sites, specifically sites delivering ten or more homes.</p>
	Conversion of family homes	<ul style="list-style-type: none"> The emerging preferred option is to allow flexibility for the conversion of a larger family home into flats, but only where a family sized unit (3+ bedrooms) is retained. An alternative approach would be to allow conversions of family homes, e.g. into flats or HMOs, without the retention of a family-sized unit.
Economy and culture	Mixed use development of industrial sites	<ul style="list-style-type: none"> The emerging preferred option is to introduce stronger protections for employment sites, so they remain in business use, whilst enabling the mixed-use redevelopment of some industrial sites for new workspace, housing and main town centre uses where the net effect would be no loss of business space. An alternative approach would involve not allowing mixed-use redevelopment of industrial sites.

Section of the plan	Policy issue	Discussion of reasonable alternatives
	Use mix on high streets	<ul style="list-style-type: none"> The emerging preferred option is to provide flexibility for a greater mix of uses in town centres (with less emphasis on Class A1 retail uses), but ensuring major centres retain a retail focus, specifically: <ul style="list-style-type: none"> In Lewisham and Catford major town centres, by seeking that development proposals ensure that Class A1 (retail) uses in Primary Shopping Areas are maintained at a minimum of 50%, as a proportion of all units. An alternative approach would involve setting specific thresholds for Class A1 (retail uses) in town centres, and with a higher threshold for A1 uses in the major town centres (in a similar way to the existing adopted local plan policies).
Green infrastructure	Open space enhancement	<ul style="list-style-type: none"> The emerging preferred option is to allow flexibility for the reconfiguration of existing open space, but only where this is delivered through a masterplan process and there will be no net loss of open space, no harm to biodiversity and improvements to the quality of open space. An alternative approach would be to not allow for the reconfiguration of existing open space.
Sustainable design and infrastructure	Zero carbon development	<ul style="list-style-type: none"> The emerging preferred option is to ensure new developments meet the London Plan standards for sustainable design and construction and, as part of this, to allow flexibility for the use of carbon offset payments, where carbon reduction targets cannot be met on-site. An alternative approach would involve requiring developments to meet carbon targets on-site in every case (i.e. not allowing flexibility for offset payments).
Transport and connectivity	Re-routing the South Circular at Catford	<ul style="list-style-type: none"> The emerging preferred option is to re-route the South Circular to help regenerate Catford town centre, which will involve de-designation of a small area of Metropolitan Open Land (MOL). An alternative approach would involve seeking to regenerate Catford Town Centre without re-routing the South Circular, thereby maintaining the current extent of the designated MOL.
	Car parking	<ul style="list-style-type: none"> The emerging preferred option is for a local approach to car parking, by seeking to reduce car use by applying the standards of Policy T6 of the Intend to Publish London Plan (2019), but carefully managing provision depending on local circumstances, for example, where train stations do not have step-free access. An alternative approach would be to apply Policy T6 of the Intend to Publish London Plan in all circumstances.

Assessment methodology

Assessment findings in respect of the ten sets of alternatives introduced above are presented across the seven tables below.

Within each table a row deals with each element of the established assessment framework (see Section 3) in turn. Within each row the columns to the right hand side seek to rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, ' = ' is used to denote where it not possible to differentiate the alternatives with any confidence, and ' ? ' is used where there is a high degree of uncertainty.

Finally, please note that a final section, at the end of this appendix, presents summary appraisal conclusions.

A note on differentiating the alternatives

The appraisal matrices below do not contain any red / amber / green shading, unlike the appraisal matrix dealing with the appraisal of alternative growth scenarios in the main body of this report (Table 6.1). This reflects an approach whereby the aim of the appraisal is solely to differentiate between the alternatives in relative terms, as opposed to additionally aiming to predict significant effects. In turn, this approach is taken because it is inherently difficult to draw meaningful conclusions regarding significant effects associated with development management policies / policy alternatives with any degree of certainty.

Optimising site capacity

Table 2: Assessment of alternatives: Optimising site capacity

Option 1 - Require individual planning applications to demonstrate that a “design-led approach” has been taken, whereby density is optimised having required to a range of factors established through policy.		Option 2 - A more prescriptive approach, with density ranges set for new developments in different areas or locations.			
Topic	Option 1	Option 2	Commentary		
Air quality and other pollution	?	?	<p>Optimising site capacity is a central plan-making task. Whilst there is an element of site selection, the task of arriving at a spatial strategy is focused more on assigning densities in order to optimise site capacity. It is the role of the Local Plan to assign an assumed density to each site allocation for the purposes of calculating the deliverable land-supply borough-wide (and, in turn, demonstrating that the London Plan target will be met and that there is a rolling five year housing land supply).</p> <p>However, there is inevitably a need for Local Plan assumptions to be revisited at the planning application stage, taking account of the full-suite of development management policies set out in the Local Plan.</p> <p>Optimising site capacity goes to the heart of the London-wide vision of Good Growth and the local vision of “An Open Lewisham”. These complimentary visions are discussed in the opening paragraphs of the Draft Plan, which relate the vision(s) to a practical need to guide investment decisions. There is a need to encourage investment, and higher densities will often be sought as a condition of investing. Higher densities will also lead to economies of scale that, in turn, supports delivery of affordable housing, employment floorspace, infrastructure and public realm enhancements alongside market housing. However, higher densities should be resisted where they would be out of character, noting that the opening paragraphs of the Draft Plan also discuss the importance of “respecting” and “celebrating” the diversity of the Borough, as part of An Open Lewisham.</p> <p>In light of these points, there are strong arguments for Option 1 in terms of a wider range of IIA topics. Whilst there can be benefit to a strategic approach (Option 2), there can be a risk of being overly prescriptive, recognising the number of sites that the Local Plan must allocate. For example, given available time and resources, it is not feasible to undertake a formal options appraisal for each site allocation, nor for all site allocations in clusters (i.e. a masterplanning approach). An Option 1 approach should work well if there is good policy in place and decisions are well-made at the planning application stage, and it is fair to assume that will be the case in LB Lewisham, noting that the opening paragraphs of the Draft Plan explain “<i>Through our unique ways of working, known as the ‘Lewisham Way’, we will work alongside stakeholders, community groups and local residents to deliver the Local Plan objectives, guided by the aim of delivering prosperous communities and achieving better outcomes for all.</i>” As a counter argument, it is possible to point to recent planning permissions in the north of the Borough with questionably high densities (particularly in light of PTAL) ; however, decisions were made having balanced wide ranging objectives, including the need to encourage a ground swell of investment to drive area-wide regeneration.</p> <p>The only IIA topic in terms of which there would be a clear benefit to an Option 2 approach is climate change mitigation, for three reasons. Firstly, high densities can lead to high heat loads and economies of scale that enable heat networks (see the Lewisham Energy Masterplan, 2020). Secondly, heat networks must be designed-in at the earliest opportunity, such that there would be benefit to providing certainty through the Local Plan. Thirdly, the Borough has set itself an ambitious decarbonisation trajectory, leading to net zero by 2030, such that there is a need for early certainty on the strategic decarbonisation measures that are feasible (including heat networks) and, in turn, the scale of the challenge.</p> <p>In a similar fashion, an Option 2 approach could also potentially support investment in transport infrastructure upgrades (including the BLE), which are costly, complex and necessitate early certainty through Local Plans with clearly defined spatial strategy. However, this less certain.</p>		
Biodiversity and green infrastructure	★1	2			
Climate change adaptation	★1	2			
Climate change mitigation	2	★1			
Communities	Accessibility	★1			2
	Housing	★1			2
	Other issues	★1			2
Economy	★1	2			
Historic env, heritage, character and culture	★1	2			
Land and natural resources	★1	2			
Transport	?	?			

Tall buildings

Table 3: Assessment of alternatives: Tall buildings

Option 1 - Only allow tall buildings in specific locations, and to assess proposals in line with criteria in Policy D9 of the Intend to Publish London Plan (2019)		Option 2 - Allow tall buildings in specific locations, and to assess proposals in line with Policy D9 of the Intend to Publish London Plan (2019), along with setting maximum limits on building heights.			
Topic	Option 1	Option 2	Commentary		
Air quality and other pollution	=	=	<p>The emerging preferred policy approach (Policy QD4) is prescriptive to an extent, in that it identifies areas suitable for tall buildings and classifies tall buildings as those buildings that are 30m or more in height, except in the designated Thames Policy Area where they are defined as buildings 25 metres or more in height. However, the draft policy stops short of setting maximum limits on the height of tall buildings, instead setting out Lewisham-specific criteria that must be taken into account, in addition to the detailed criteria set out by Policy D9 of the Intend to Publish London Plan (2019). A key requirement (as summarised in the supporting text of Policy QD4) is that: <i>“All proposals for tall and taller buildings must have a clear urban design rationale and should be of an exceptional design and architectural quality. They should also be located and sited in a manner that ensures that development will positively contribute to local character and high quality living environments.”</i></p> <p>In light of these points, there are strong arguments for Option 1 in terms of a wide range of IIA topics. In many respects, it is difficult to envisage benefits that might result from an Option 2 approach, namely the approach of setting maximum heights for tall buildings, either borough-wide (i.e. within all of the identified areas for tall buildings) or on an area specific basis. The effect could be to unduly curtail buildings of an exceptional design and architectural quality that respond positively to local character (etc.). Also, there would be a risk of developers seeking to argue a case for building to the maximum height, on the basis that it has already been established as to some extent a suitable height.</p> <p>The only clear argument for Option 2 is from a climate change adaptation perspective, as taller buildings do give rise to challenges in respect of overheating. This matter was recently examined in detail through a study prepared to inform a draft <i>Energy, daylight & overheating in high density developments</i> SPD for the Old Oak and Park Royal Development Corporation (OPDC).⁴⁵ The study concludes that: <i>“On both residential and non-residential developments, balancing energy, daylight and overheating will require project specific modelling to inform early stage design choices. In some circumstances, it will be possible to meet all the targets together, however in other circumstances there will need to be a trade-off between daylight and overheating that can also impact on energy use.”</i> The concern in respect of poor access to daylight leading to health and wellbeing implications is also of note.</p> <p>As touched-upon in the preceding quote from the OPDC study, there can also be challenges from a climate change mitigation perspective. In particular: there can be a need for air conditioning to avoid summer overheating, making achievement ‘be lean’ targets challenging; and roof space for solar PV (‘be green’) will invariably be very limited. There can also be design challenges in respect of building level air source heat pump solutions (‘be green’), given the need to avoid visual and noise issues. However, on the other hand, tall buildings amount to high density development that can be supportive of district-level heat network delivery (‘be clean’; see discussion under ‘Optimising site capacity’), and there are not known to be any particular challenges in respect of delivering heat network piping within tall buildings (see Enfield case study in Section 9.5). It is also fair to highlight that tall buildings will be major schemes where the developer will be expected to apply careful approaches to modelling emissions and potentially will fund ongoing monitoring of emissions of time (‘be seen’).</p>		
Biodiversity and green infrastructure	=	=			
Climate change adaptation	2	★1			
Climate change mitigation	?	?			
Communities	Accessibility	★1			2
	Housing	★1			2
	Other issues	?			?
Economy	★1	2			
Historic env, heritage, character and culture	★1	2			
Land and natural resources	=	=			
Transport	=	=			

⁴⁵ See www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/opdc-planning/supplementary-planning-documents

Affordable housing

Table 4: Assessment of alternatives: Affordable housing

Option 1 - Set a target of 50% of all new homes built to be 'genuinely affordable', which is defined as housing at social rent levels (which is set on the basis of local income levels); this means that intermediate and market housing products would not be considered as genuinely affordable.		Option 2 - Use the standard definition for affordable housing, as set out at Policy H6 of the Intend to Publish version of the new London Plan (2019), which includes intermediate products.		
Topic	Option 1	Option 2	Commentary	
Air quality and other pollution	=	=	The Lewisham Strategic Housing Market Assessment (SHMA, 2019) concludes (pg.12): <i>"This analysis clearly demonstrates that social and affordable renting remains the most affordable tenure options available to households. It raises serious concerns over relative affordability of accommodation within the Borough, and particularly for the key workers and wage earners considered."</i> For key workers and lower wage earners, market rental and intermediate affordable housing products are unaffordable. This situation contributes to acute issues of overcrowding and homelessness, which is reflected by the extensive number of households on the Council's Housing Register (7.6% of households in the Borough, as of May 2019). This is also a spatially specific issue, with the SHMA finding: <i>"There are nine wards where even if 50% of lower quartile income was spent on rent, it would not reach current rent prices."</i> Furthermore, BAME groups are more likely to be social renters (38%) compared with all households (31%); and BAME groups are also disproportionately affected by overcrowding (17% compared to 12%).	
Biodiversity and green infrastructure	=	=		
Climate change adaptation	=	=		
Climate change mitigation	=	=		
Communities	Accessibility	=	In light of the above, the proposal (Option 1) is for 50% of all new homes delivered in the Borough to be genuinely affordable - which is defined as housing at social rent levels or GLA's London Affordable Rent level – with all other housing products below market levels (whether for sale or rent) defined as intermediate housing. This will be achieved by requiring that 70% of the affordable home component at major sites is genuinely affordable, and through support for genuinely affordable housing at smaller sites (including 100% schemes delivered by RSLs). However there is also a need for affordable housing that is available to people who do not meet the criteria for genuinely affordable housing, but are also unable to afford housing in the open market. The NPPF (2019; see Annex 2) widened the definition of affordable housing to include a new emphasis on intermediate housing; and the emerging new London Plan (2019) leaves open the option of Borough's supporting intermediate housing options to a greater or lesser extent (see point A3 of Policy H6). Option 2 would respond to this need, and the national policy context, via a higher proportion of intermediate housing products, including London Living Rent and shared ownership. This approach is not supported by the SHMA; however, there are potentially economic arguments in favour. The Employment Land Study (2019) presents an overview of local employment trends, notably finding that: a high proportion of jobs in Lewisham are part time; that the average wage of full-time workers working in Lewisham is 5% lower than those of the resident workforce; and that: <i>"Whilst the number of new businesses being formed in Lewisham has grown rapidly in recent years, increasing by more than 50% since 2011, much of this is due to structural changes on the nature of work with higher levels of self-employment and contract work and the growth of the gig economy..."</i> [emphasis added]. These trends will have been taken into account through the SHMA, and lend support for Option 1. However, there is also a need to consider the changing nature of the local economy, and the objective of growing micro and small sized businesses, including start-ups , and particularly within the cultural, creative and digital industries. A major focus of the Draft Local Plan is on delivering affordable workspace to support such businesses, as lack of low-cost and affordable workspace is a key barrier to entry in the local economy (<i>"there is an imperative to grow Lewisham's economic base, and provision of affordable workspace will be integral to achieving this"</i>), and it may be the case, to some extent, that employees of such business tend to be in need of intermediate housing.	
	Housing	★1		2
	Other issues	★1		2
Economy	?	?		
Historic env, heritage, character and culture	=	=		
Land and natural resources	=	=		
Transport	=	=		

Conversion of family homes

Table 5: Assessment of alternatives: Conversion of family homes

Option 1 - Allow flexibility for the conversion of a larger family home into flats, but only where a family sized unit (3+ bedrooms) is retained.				
Option 2 - Allow conversions of family homes, e.g. into flats or HMOs, without the retention of a family-sized unit.				
Topic	Option 1	Option 2	Commentary	
Air quality and other pollution	=	=	<p>The SHMA (2019) finds that: <i>“There is expected to be an increase of around 5,900 families living in the borough over the period 2020-39. There are also disparities between different tenures with only 25.9% private rented stock and 28.6% of affordable housing stock being 3 and 4 bedroom properties, compared to 59.7% in owner occupied stock... It will be important for family sized accommodation to be provided as part of the overall mix of housing, and in particular to be provided as part of affordable provision, on new build schemes.”</i></p> <p>The SHMA (2019) also finds that: <i>“Given the unaffordability of housing to those households with lower quartile or median incomes, growth in HMOs is expected to continue... Whilst recognising the need for HMOs, careful consideration will need to be given to ensure that new HMOs contribute to a beneficial mix and balance of uses within an area, do not result in the loss of family occupation, an overconcentration of HMOs or adverse impacts on amenity, are located in areas of good transport accessibility and are well-designed and well managed.”</i></p> <p>In light of these findings, there is support for family housing, as part of both emerging draft policies HO1 (new build) and HO2 (conversions). This approach (Option 1) is supported by the SHMA; however, the SHMA also recognises that there is a need to avoid unduly putting in place barriers to HMOs, which <i>“have a place in the market in that they form an alternative, more affordable form of housing.”</i> The SHMA also goes on to explain:</p> <p><i>“Given the lack of affordability of housing in Lewisham to lower income households... growth in demand for HMOs is likely to continue. This demand is partially being met by ‘spare room’ lettings, however, more HMO accommodation could form a more affordable solution especially for younger, single person households.”</i></p> <p>The Draft Plan goes further still, stating: <i>“Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness.”</i></p> <p>An Option 2 approach could facilitate more HMOs coming forward, through conversion of family homes; however, ultimately, the SHMA is clear that HMOs should not lead to the further loss of family housing.</p> <p>There is also a need to consider whether some of the family homes at greater risk of conversion under Option 2 would be part of the affordable housing stock. If this is the case, then Option 2 could lead to disproportionate impacts to BAME groups, noting that the SHMA states: <i>“BAME groups are... disproportionately affected by overcrowding... due to the low proportion of family homes within the affordable stock and the uneven distribution of such housing across the borough... A mix of tenures with a focus on social rented family sized properties will help to address the needs of BAME groups.”</i></p> <p>In light of these points, Option 1 is favoured in respect of both ‘Housing’ and ‘Other community issues’.</p>	
Biodiversity and green infrastructure	=	=		
Climate change adaptation	=	=		
Climate change mitigation	=	=		
Communities	Accessibility	=	<p>The SHMA (2019) finds that: <i>“There is expected to be an increase of around 5,900 families living in the borough over the period 2020-39. There are also disparities between different tenures with only 25.9% private rented stock and 28.6% of affordable housing stock being 3 and 4 bedroom properties, compared to 59.7% in owner occupied stock... It will be important for family sized accommodation to be provided as part of the overall mix of housing, and in particular to be provided as part of affordable provision, on new build schemes.”</i></p> <p>The SHMA (2019) also finds that: <i>“Given the unaffordability of housing to those households with lower quartile or median incomes, growth in HMOs is expected to continue... Whilst recognising the need for HMOs, careful consideration will need to be given to ensure that new HMOs contribute to a beneficial mix and balance of uses within an area, do not result in the loss of family occupation, an overconcentration of HMOs or adverse impacts on amenity, are located in areas of good transport accessibility and are well-designed and well managed.”</i></p> <p>In light of these findings, there is support for family housing, as part of both emerging draft policies HO1 (new build) and HO2 (conversions). This approach (Option 1) is supported by the SHMA; however, the SHMA also recognises that there is a need to avoid unduly putting in place barriers to HMOs, which <i>“have a place in the market in that they form an alternative, more affordable form of housing.”</i> The SHMA also goes on to explain:</p> <p><i>“Given the lack of affordability of housing in Lewisham to lower income households... growth in demand for HMOs is likely to continue. This demand is partially being met by ‘spare room’ lettings, however, more HMO accommodation could form a more affordable solution especially for younger, single person households.”</i></p> <p>The Draft Plan goes further still, stating: <i>“Good quality HMOs make an important contribution to local housing provision, particularly for vulnerable groups and those on lower incomes. For some people the availability of bedsits may be the only alternative to homelessness.”</i></p> <p>An Option 2 approach could facilitate more HMOs coming forward, through conversion of family homes; however, ultimately, the SHMA is clear that HMOs should not lead to the further loss of family housing.</p> <p>There is also a need to consider whether some of the family homes at greater risk of conversion under Option 2 would be part of the affordable housing stock. If this is the case, then Option 2 could lead to disproportionate impacts to BAME groups, noting that the SHMA states: <i>“BAME groups are... disproportionately affected by overcrowding... due to the low proportion of family homes within the affordable stock and the uneven distribution of such housing across the borough... A mix of tenures with a focus on social rented family sized properties will help to address the needs of BAME groups.”</i></p> <p>In light of these points, Option 1 is favoured in respect of both ‘Housing’ and ‘Other community issues’.</p>	
	Housing	★ 1		2
	Other issues	★ 1		2
Economy	=	=		
Historic env, heritage, character and culture	=	=		
Land and natural resources	=	=		
Transport	=	=		

Mixed use development of industrial sites

Table 6: Assessment of alternatives: Mixed use development of industrial sites

Option 1 - Introduce stronger protections for employment sites, so they remain in business use, whilst enabling the mixed-use redevelopment of some industrial sites for new workspace, housing and main town centre uses where the net effect would be no loss of business space.			
Option 2 - Do not allow mixed-use redevelopment of industrial sites.			
Topic	Option 1	Option 2	Commentary
Air quality and other pollution	2	★1	<p>Redevelopment of designated industrial sites has been a key policy issue in the London context for a number of years. The emerging new London Plan reflects a step-change in policy, seeking to address loss of industrial land capacity by supporting the “intensification” of existing sites, whereby higher value uses – primarily housing – are delivered alongside either a ‘no net loss’ of industrial capacity or a net increase.</p> <p>Lewisham has seen significant losses of employment land and floorspace, including industrial, in recent years. Some of this can be attributed to plan-led consolidation and release of land to support strategic regeneration objectives, particularly through mixed-use redevelopment of MEL sites in the north of the Borough. However, beyond this plan-led process the Borough’s other employment sites and premises are facing increased pressure for redevelopment from other higher value land uses, particularly housing. This pressure has been amplified by the introduction of planning legislation, for example, new permitted development rights enabling the conversion of offices and warehouses to residential uses through the Prior Approval process.</p> <p>Option 1 therefore supports a carefully targeted / plan-led approach to colocation of higher value uses on existing SIL and LSIS, in order to deliver renewal of the industrial floorspace / capacity and the long term viability of these sites. This will naturally include housing, as a high value land use, but will also include new employment space aimed at meeting the priority need for affordable workspace for micro, small and medium sized businesses operating in the cultural, creative and digital industries.</p>
Biodiversity and green infrastructure	★1	2	
Climate change adaptation	2	★1	
Climate change mitigation	?	?	
Communities	Accessibility	★1	<p>There are clear benefits to this approach, particularly in light of proposed policies and supporting text – both Borough-wide (Policy EC2: Protecting employment sites and delivering new workspace) and site-specific – that support site masterplans, set stipulations regarding how industrial capacity is defined and measured (e.g. clarifying that new mezzanine space, whilst supported, should be excluded from calculations) and put an onus on the applicant to explore alternative design options (with supporting text notably highlighting that the needs of those businesses that require “a significant amount of operational yard or servicing space to function effectively” should be considered). It is clear from the London-wide context that there are increasingly effective design solutions to addressing the tensions that can otherwise exist between housing and industry (particularly light industry), and there is also the potential to learn from recent experience at MEL sites in Lewisham.</p>
	Housing	★1	
	Other issues	★1	
Economy	★1	2	<p>However, this strategy also gives rise to certain concerns</p> <p>Firstly, there will inevitably be pressure on those industries less suited to colocation / operation within an intensified site to move their operations out of London. This may reflect organic evolution of industrial priorities, in certain respects (e.g. the increasing focus on warehousing for last mile deliveries); however, there is a need to consider implications for those who rely on existing ‘industries at risk’ for employment, who might be geographically clustered and/or tend to be at risk of unemployment.</p>
Historic env, heritage, character and culture	★1	2	<p>Secondly, there can be instances where efforts to masterplan and design-out amenity / local environment impacts are not successful.</p>
Land and natural resources	★1	2	<p>Thirdly, there is a tendency for industrial sites to be less suitable for housing, primarily due to flood risk but also due to close association with rail and/or major road corridors. Historically, transport corridors and industrial land in Lewisham has been located in valley bottom locations where there is significant flood risk. The relatively recent trend (London-wide) to redevelop industrial sites for housing has correlated with increasing understanding of ways to design-out flood risk; however, risks can remain, particularly given climate change.</p>
Transport	★1	2	

Use mix on high streets

Table 7: Assessment of alternatives: Use mix on high streets

Option 1 - The emerging preferred option is to provide flexibility for a greater mix of uses in town centres (with less emphasis on Class A1 retail uses), but ensuring major centres retain a retail focus, specifically: In Lewisham and Catford major town centres, by seeking that development proposals ensure that Class A1 (retail) uses in Primary Shopping Areas are maintained at a minimum of 50%, as a proportion of all units.		Option 2 - An alternative approach would involve setting specific thresholds for Class A1 (retail uses) in town centres, and with a higher threshold for A1 uses in the major town centres (in a similar way to the existing adopted local plan policies).		
Topic	Option 1	Option 2	Commentary	
Air quality and other pollution	★1	2	Supporting text to Policy EC10 explains (in summary): Lewisham's town centres are extremely important and their role locally must be reinforced; Lewisham's town centre network is functioning well; however, some centres are performing better than others; national consumer trends lead to a risk of high street and town centre decline, which must be managed. Whilst online shopping is affecting the retail sector, traditionally a stronghold of town centres, this has opened opportunities for the re-use of buildings. Complementary cultural, leisure and community uses are increasingly taking up space in town centres, with high density residential potentially supported in order 'enable' lower value land uses and provide the necessary footfall (and residential in highly accessible town centres is increasingly supported from a transport / climate change mitigation / air quality perspective). If carefully managed, there is the potential to deliver on a distinctive new vision for Lewisham's network of town centres, reinforcing town centre distinctiveness and addressing high street homogenisation of recent decades. There can also be the potential to support more space for independent local businesses and community uses, which if successful will tend to reinvest back into the local community, beginning a virtuous cycle ("Community Wealth Building"). The C-19 pandemic is likely to accelerate the shift to online retail, but may also trigger greater appreciation of town centres as locations to access services and facilities and spend leisure time, particularly if town centres can be reconfigured to avoid overcrowding. In light of these points, Option 1 would maintain the current requirement for A1 (retail) uses in Lewisham and Catford town centres, where there is space to <i>both</i> maintain a retail centre function <i>and</i> deliver wider functions, whilst reducing A1 (retail) requirements at the second tier local centres of Blackheath, Deptford, Downham, Forest Hill, Lee Green and New Cross Gate. ⁴⁶ Specifically, within these second tier local centres, primary shopping areas will be defined, where retail should be located (i.e. retail elsewhere will be resisted), and criteria will be in place to resist inappropriate non-retail uses (including with a view to avoiding three or more adjoining non-retail uses), but non-retail uses within the primary shopping areas will not be resisted on the basis that the effect would be that the overall proportion of retail would drop below a threshold level. This approach is supported by the Retail Study (2019) , which finds that the majority of the Borough's retail needs can be met at Lewisham and Catford, and that the second tier centres are already evolving away from retail. For example, Blackheath is characterised by café/restaurant culture, whilst retail in Deptford is mainly provided by the market. In conclusion , there are variances in the role and nature of uses in the District Centres, which serves to indicate that a standard threshold approach is not appropriate. Whilst some borough-wide priorities (notably the need to limit hot food takeaways) necessitate thresholds, this is not the case for retail. On this basis, it is difficult to suggest any benefit to Option 2, whilst the benefits of securing town centre viability and vitality under Option 1 are wide ranging. Furthermore, any concerns in respect of Option 1 are reduced on account of the proposal to require 'non A1' applicants to draw upon monitoring data on the local use mix.	
Biodiversity and green infrastructure	★1	2		
Climate change adaptation	★1	2		
Climate change mitigation	★1	2		
Communities	Accessibility	★1		2
	Housing	★1		2
	Other issues	★1		2
Economy	★1	2		
Historic env, heritage, character and culture	★1	2		
Land and natural resources	★1	2		
Transport	★1	2		

⁴⁶ N.B. the proposal under Option 1 is that a threshold approach will be applied in Sydenham town centre, which has a uniquely high level of shops, seemingly acting as an important retail centre for the southern part of the Borough.

Open space enhancement

Table 8: Assessment of alternatives: Open space enhancement

Option 1 - Allow flexibility for the reconfiguration of existing open space, but only where this is delivered through a masterplan process with no net loss of open space and a net improvement in quality.		Option 2 - Do not allow for the reconfiguration of existing open space.			
Topic	Option 1	Option 2	Commentary		
Air quality and other pollution	★1	2	<p>Lewisham benefits from a wide range of good quality open spaces, which total around one-fifth of the area of the Borough; however, as the Borough's population increases the pressure on open spaces will rise. The Lewisham Open Spaces Assessment (2019) finds that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term; however, there will be limited opportunities to create new open space. It is therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced.</p> <p>Allocating sites for development that include an element of open space, with a view to improving the open space as part of the development scheme, can be an effective approach to addressing deficiencies in the quantity and quality of provision. The Open Spaces Assessment finds that only 10% of Lewisham's open spaces (28% by area) are in 'good' condition, which serves to indicate the need to explore interventions. The question is whether open space onsite should be retained and improved in situ, or whether there should be the potential to reconfigure open space within development sites. Reconfiguration of open space can be a practical necessity in order to make redevelopment schemes achievable and viable; however, the focus here is on the question of whether it can lead to benefits in terms of open space provision and green infrastructure. There is evidence locally to suggest that it can:</p> <p>In the North of the Borough, two recently committed major schemes – Convoys Wharf and Surrey Canal Triangle (both c.3,500 homes) – are delivering / set to deliver reconfigured open space leading to significant net benefits, with the former repairing breaks in the Thames Path and delivering major new riverfront open space, and the latter delivering a linked network of new high quality public open and green spaces as a central design feature (see SPD). In the Central Area, which is set to be directed a high proportion of growth through the Local Plan, there are significant opportunities to reconfigure open space along the river corridors, leading to improved access and improved strategic green/blue infrastructure network (linking with river de-culverting and biodiversity objectives). Lewisham Gateway is a major permitted site (1,050 homes) that will see open space reconfigured as part of: "A programme of river restoration, including channel re-profiling, to improve the ecological quality of the water environment and enhance the amenity provided by the Rivers Quaggy and Ravensbourne, along with Waterlink Way [to include a] central landscaped open space that celebrates the confluence of the rivers." In the South of the Borough there is also a likelihood of growth being focused along the river corridors; for example, a potential allocation at Homebase/Argos, Bromley Road includes a pond and SINC, with the proposal being to enhanced green infrastructure and open space as part of a "site-wide public realm strategy".</p> <p>A final consideration is in respect of estate regeneration. The layout and orientation of buildings can tend to make some open spaces difficult to access, with associated poor amenity. There is typically scope to re-configure open space, so as to deliver significant net improvements, as part of a regeneration scheme that will typically also deliver a net increase in the number of homes onsite (also addressing wider issues).</p> <p>In conclusion, flexibility to reconfigure open space, subject to criteria being met, is supported in terms of a wide range of IIA topics, particularly given the Lewisham-specific context of growth being set to be focused along river corridors currently associated with poor accessibility and poorer quality open of open spaces. Site-by-site consideration must, however, be given to elements of existing open/greenspace that cannot easily be recreated / replaced, including areas of semi-natural habitat, and contribution to the setting of historic environment assets.</p>		
Biodiversity and green infrastructure	?	?			
Climate change adaptation	★1	2			
Climate change mitigation	=	=			
Communities	Accessibility	★1			2
	Housing	★1			2
	Other issues	★1			2
Economy	★1	2			
Historic env, heritage, character and culture	?	?			
Land and natural resources	★1	2			
Transport	★1	2			

Zero carbon development

Table 9: Assessment of alternatives: Zero carbon development

Option 1 - Ensure new developments meet the London Plan standards for sustainable design and construction and, as part of this, to allow flexibility for the use of carbon offset payments.			
Option 2 - Require developments to meet carbon targets on-site in every case (i.e. no flexibility for offsetting)			
Topic	Option 1	Option 2	Commentary
Air quality and other pollution	=	=	In order for Lewisham to become a net zero-carbon Borough by 2030 it will be crucial that new developments are designed to an ambitious zero carbon standard.
Biodiversity and green infrastructure	=	=	For all major residential developments in London a net zero target for regulated emissions ⁴⁷ has been in place since 2016, but Policy SI2 (Minimising greenhouse gas emissions) of the ItP London Plan (2019) extends this to non-residential, as well as specifying certain other requirements. Specifically, the requirement is to achieve: a minimum 35% reduction ⁴⁸ in emissions on-site, with at least 10% (residential) or 15% (non-residential) of the reduction achieved through efficiency measures, in-line with an 'energy hierarchy approach', where the aim is to be "lean" as a priority, ahead of taking measures to reduce emissions by being "clean" and "green" in respect of the supply of heat and power.
Climate change adaptation	=	=	
Climate change mitigation	2	★1	Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be offset through cash in lieu contributions to a borough carbon offset fund and/or through specifically identified and deliverable off-site measures. The cash payments are based on a rate that has increased from £60/tCO ₂ (current adopted policy) to £95/tCO ₂ (ItP London Plan) and payment is calculated based on the annual residual emissions for a period of 30 years, resulting in a default price of £2,850 per annual tonne of residual CO ₂ emissions.
Communities	Accessibility	=	Developers tend to target the minimum 35% on site saving as offsetting payments are typically less costly than on-site measures; however, on-site savings must be maximised . This reflects:
	Housing	★1	<ul style="list-style-type: none"> The well-known risks associated with offsetting, such that actual emissions savings are lower than the design intent of the offsetting scheme. For example, it is difficult to know for certain that offsetting measures are genuinely 'additional', in that they would not have happened in any case under a business as usual scenario.⁴⁹ The scale of ambition that is required in order to achieve 'true net zero', noting that: regulated emissions are often underestimated;⁵⁰ there are significant 'unregulated' sources of emissions from new build;⁵¹ it will be very challenging to decarbonise the existing building stock that will still be in place by 2030; and there are a wide range of non-built environment emissions sources to tackle.
	Other issues	=	
Economy	★1	2	In order to minimise offsetting the most effective mechanism would be to review the offset price. This should be done in light of the cost of delivering offset projects to a suitably high standard. Any steps that aim to prevent or increase the cost of offsetting would need careful viability testing, and there could be implications for spatial strategy (i.e. a need to focus on most viable sites).
Historic env, heritage, character and culture	=	=	
Land and natural resources	=	=	In conclusion , whilst Option 2 is preferable in theory, in terms of climate change mitigation, but it is not likely to be viable.
Transport	=	=	

⁴⁷ Regulated emissions are those *operational* emissions associated with the operation of a building that are inherently related to building design and, in turn, covered by the Building Regulations.

⁴⁸ Measured against a baseline situation whereby the Target Emission Rate (TER) of Part L of Building Regulations for a gas boiler heated development is met.

⁴⁹ See discussion at page 15 of the GLA Guidance: [london.gov.uk/sites/default/files/carbon_offset_funds_guidance_2018.pdf](https://www.london.gov.uk/sites/default/files/carbon_offset_funds_guidance_2018.pdf)

⁵⁰ Government's Future Homes Standard Consultation document (2019) discusses a 'performance gap' between modelled and actual ('as built') regulated emissions. This is reflected in Policy SI2 of the ItP London Plan (2019) adding a new tier to the energy hierarchy – "be seen" – with the aim of encouraging modelling best practice and monitoring / evaluation of as built emissions.

⁵¹ The ItP London Plan Policy I2 includes new focus / increased emphasis on **unregulated operational emissions** (emissions not covered by Part L of the Building Regulations, including as a result of plug-in loads, cooking and power use for communal areas, including lighting and lifts); and **embodied emissions**, which are the non-operational emissions associated with any building, covering both the emissions associated with a building at the time it is completed and non-operational emissions associated with subsequent stages of the building lifecycle, e.g. maintenance, repair, retrofitting, demolition and disposal.

Re-routing the South Circular at Catford

Table 10: Assessment of alternatives: Re-routing the South Circular at Catford

Option 1 - Re-route the South Circular to help regenerate Catford town centre, which will involve de-designation of a small area of Metropolitan Open Land (MOL).			
Option 2 - Seek to regenerate Catford Town Centre without re-routing the South Circular, thereby maintaining the current extent of the designated MOL.			
Topic	Option 1	Option 2	Commentary
Air quality and other pollution	★1	2	The re-routing of the A205 South Circular to the south of Laurence House has been discussed as an option for a number of years. Most recently, the Catford masterplan identifies it as the first of twelve place-making principles, with the subsequent eleven place-making principles essentially building upon it as a foundation.
Biodiversity and green infrastructure	★1	2	The effect of realigning the road to the south will be to free up space to the north of the road, which can then be used to deliver new high quality urban realm. This new urban realm will serve to effectively provide both north-south links (between the town centre and the current site of Lawrence House) and east-west links (between Lawrence House and the rail stations). This will address the current issue of very poor connectivity due to the busy road corridor.
Climate change adaptation	?	?	It is difficult to envisage how the objectives of the masterplan could be achieved without the realignment, and hence it is possible to highlight a wide range of benefits associated with Option 1 .
Climate change mitigation	★1	2	Focusing on matters directly, relating to the realignment, it is possible to highlight clear benefits in respect of air quality (the South Circular is forms the southern extent of the borough's AQMA); safety (the existing bridge over the railway line and Ravensbourne River is a pinch point for traffic where cars, lorries and buses take priority); and climate change mitigation (the Lewisham Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstons College Jubilee Grounds MOL at the same time as road realignment, with a view to minimising disruption.
Communities	Accessibility	★1	The recent Bakerloo Line Extension Economic Impact Assessment finds that Catford Bridge Station has a Health Streets score of 49, largely due to the problematic South Circular, but that an upgraded Catford Bridge station could assist with increasing the score to at least 65, with an improved interchange (Catford Station and busses), better use of the river and improved connection to the Broadway and town centre.
	Housing	★1	
	Other issues	★1	
Economy	★1	2	However, realignment will result in the loss of the northern-most part of the St. Dunstons College Jubilee Grounds MOL , hence there are arguments for Option 2 . This MOL is used by the school and is not publicly accessible, but is widely valued as providing a green setting to Catford town centre. The MOL Review (2020) concludes a need to 'conserve and enhance' the MOL, finding that, whilst it performs quite poorly in terms of certain MOL criteria, it performs well in terms of 'contributing to the physical structure of London by being clearly distinguishable from the built-up area'. A mitigating factor is that a significant proportion of the MOL that would be lost is the current northeast corner that is already segregated from the main part of the MOL by a small access road (see image); however, there is no avoiding the conclusion that an area of MOL will be lost that is not insignificant.
Historic env, heritage, character and culture	★1	2	Another consideration is that this entire area falls within a fluvial flood risk zone , including areas of flood risk zone 3; however, it is difficult to conclude that realignment will necessarily support additional housing (or other sensitive uses) in a flood risk zone. To some extent, realignment may contribute to the strategic objective of 'unveiling' the currently hidden and culverted River Ravensbourne, which is adjacent to the west.
Land and natural resources	2	★1	
Transport	★1	2	



Car parking

Table 11: Assessment of alternatives: Car parking

Option 1 - A local approach to car parking, by seeking to reduce car use by applying the standards of Policy T6 of the Intend to Publish London Plan (2019), but carefully managing provision depending on local circumstances, for example, where train stations do not have step-free access.			
Option 2 - Apply Policy T6 of the Intend to Publish London Plan in all circumstances.			
Topic	Option 1	Option 2	Commentary
Air quality and other pollution	=	=	Policy T6 of the ItP London Plan (2019) sets out maximum standards for car parking within developments according to PTAL, ranging from 'car free' where PTAL is between 5 and 6 to 1.5 spaces per dwelling where PTAL is between 0 and 1. The supporting text of Policy T6 goes on to explain that:
Biodiversity and green infrastructure	=	=	<i>"Reduced parking provision can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. As the population grows, a fixed road network cannot absorb the additional cars that would result from a continuation of current levels of car ownership and use."</i>
Climate change adaptation	=	=	At the same time, there is a major focus on ensuring that the effect is not to worsen the current issue of high levels of on-street parking , which is recognised as a significant barrier to walking and cycling, reduces the appeal of streets as public places and has an impact on the reliability and journey times of bus services. Specifically, Policy T6 states:
Climate change mitigation	?	?	<i>"An absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets."</i>
Communities	Accessibility	=	The proposal under Option 1 is to apply the ItP London Plan Policy T6 approach, but with an added degree of flexibility to reflect the local situation and local priorities. In particular, it is proposed that current and expected future PTAL levels will be scrutinised, rather than applied in a 'blanket' fashion, taking into account detailed matters such as whether there is step-free access at stations. Also, in respect of the London Plan's suggestion that an absence of local on-street parking controls "should not be a barrier to new development" (i.e. car free or car lite schemes should not be refused because of concerns regarding on-street parking) the proposed approach (Option 1), involves an added element of caution. Specifically, the proposed approach is to put the onus clearly on the Council and applicant to work together to understand on-street parking issues as part of the planning application process, as opposed to assuming that on-street parking controls can be added subsequent to developments to address any issues that occur. This approach reflects the local situation, whereby on-street parking controls are not always appropriate [MORE?]
	Housing	=	
	Other issues	★ 1	
Economy	?	?	
Historic env, heritage, character and culture	=	=	In conclusion , Option 1 would involve a modest loosening of the ItP London Plan's proposed stringent approach to setting maximum parking standards or, in other words, a modest caveating of the ItP London Plan's broad brush support for car free and car light development. This approach is supported from a perspective of supporting communities and the needs of particular groups, in particular those with restricted mobility. There is also an argument to suggest that there is merit from a perspective of wishing to support modal shift towards walking, cycling and public transport, as the intention is to avoid problematic on-street parking; however, these arguments are not clear cut. There is also strong argument to suggest that the priority is to limit parking (Option 2) so as to encourage people to live without access to a personal car.
Land and natural resources	=	=	
Transport	?	?	N.B. it is noted that there is the potential to support parking within development sites as a temporary use, with conditions in place to ensure that parking is used for an alternative use (e.g. open space or play space) once access to public transport (taking account of factors such as step free access) is judged to have reached a suitable level.

Conclusion

The table below presents a brief summary of the assessment findings set out across the ten appraisal matrices above, as well as the Council's response to the assessment / reasons for supporting the preferred option.

Table 12: Assessment conclusions and Council responses

Policy issue	Assessment conclusion	Council response
Optimising site capacity	There is broad support for the emerging preferred option, which involves determining site capacities at the planning application / development management planning stage, rather than being prescriptive through the Local Plan; however, a more prescriptive approach is supported from a climate change mitigation perspective, and also potentially from a perspective of wishing to support delivery of major infrastructure, including transport infrastructure.	<p>The Council recognises that there is broad but caveated support for the emerging preferred option. The implication is a need to keep the policy under review.</p> <p>The Council recognises that there will be instances where a strategic, plan-led approach to site capacities, within a given area, can help to unlock opportunities for targeted investment in infrastructure, including transport, community, low carbon and green/blue infrastructure.</p> <p>The Council has used a methodology to set indicative capacities for strategic sites, as these will support the delivery of the spatial strategy. It will also embark on masterplanning exercises in key areas to support plan implementation, and to provide a more granular and design-led approach to establishing the optimal capacity of a site or area.</p> <p>The Council recognises the challenge of meeting the Borough's future requirements, such as for new homes and workspace, and is therefore seeking to take a positive approach to new development; providing flexibility for proposals to demonstrate that the development capacity / density is appropriate to the local context, taking into account individual site circumstances.</p>
Tall buildings	There is broad support for the emerging preferred option, which involves flexibility to make decisions on tall buildings at the planning application / development management planning stage, rather than being prescriptive through the Local Plan regarding maximum building heights; however, a more prescriptive approach is supported from a climate change adaptation perspective, and there are also potentially benefits to limiting building heights in terms of 'health and wellbeing' and climate change mitigation.	<p>The Council recognises that there is broad but caveated support for the emerging preferred option. The implication is a need to keep the policy under review.</p> <p>The Council recognises that there are both inherent challenges to delivering tall buildings and also challenges specific to the borough context. The Council is seeking to take a positive approach to new development, and aims to strike a balance between protecting and enhancing local character, whilst acknowledging that the character of Lewisham continues to evolve in the context of a growing London. The preferred approach is to introduce rigorous policy requirements for tall and taller buildings, consistent with the London Plan, but without setting caps on heights.</p> <p>The Council recognises the the challenge of meeting the Borough's future requirements, such as for new homes and workspace, and is therefore seeking to provide flexibility for development proposals to demonstrate that building heights are appropriate to the local context, taking into account site circumstances, together with a development's individual and cumulative impact.</p>

Policy issue	Assessment conclusion	Council response
Affordable housing	<p>There is clear support for the emerging preferred option, which involves a tenure split reflective of the SHMA recommendations; however, there is a 'question-mark' in respect of economic objectives, as additional support for intermediate housing products could potentially serve to attract and retain skilled workers within the Borough, including skilled workers within priority industries.</p>	<p>The Council recognises that there is clear but caveated support for the emerging preferred option. The implication is a need to keep the policy under review.</p> <p>The Council is committed to delivering a significant increase in genuinely affordable housing in Lewisham, taking into account local income levels. As set out in the evidence base, social rented housing is the only type of housing that is affordable to most people in the Borough. The preferred approach is therefore to give priority to this tenure type.</p> <p>The Council agrees that provision for a wider range of housing products, including intermediate homes, is desirable and could assist with the achievement of economic objectives; the Local Plan therefore seeks to significantly boost housing delivery, helping to ensure provision for a range of housing choices which are affordable to the local population, whilst promoting those tenures for which need is greatest.</p>
Conversion of family homes	<p>There is clear support for the emerging preferred option, which seeks to ensure a degree of protection for family homes, in line with the recommendations of the SHMA. It is recognised that the effect may be to restrict new HMOs to an extent; however, ultimately the SHMA is clear that HMOs should not lead to the further loss of family housing.</p>	<p>The Council recognises that there is clear but caveated support for the emerging preferred option. The implication is a need to keep the policy under review.</p> <p>The Council recognises the challenge of delivering on its strategic housing target. At the same time, it must also plan positively to meet the wide range of housing needs in the Borough, including for families. The SHMA reflects a continued need for more family homes in Lewisham, whilst the latest development data shows that the majority of new homes being built are 1 and 2 bed units. The preferred approach is therefore to allow flexibility for the conversion of larger homes (3+ beds) to create additional units, but only where a family housing unit is retained.</p> <p>With regards to HMOs, the Council recognises that this type of development has an important role in helping to meet local housing need, particularly for vulnerable groups. However, this type of development must be carefully managed in order to ensure residential units are of a high quality standard, and to provide for inclusive and mixed communities across the Borough. The preferred approach therefore does not preclude the development of new HMOs.</p>

Policy issue	Assessment conclusion	Council response
Mixed use development of industrial sites	There are wide ranging arguments for supporting a planned approach to mixed use redevelopment of designated industrial sites; however, there are also certain risks to be aware of, including noting the tendency for existing industrial sites to be located in flood risk zones.	<p>The Council recognises that this is a challenging area of policy, that Lewisham is not alone in facing this challenge and that there is a need to consider this issue from a long term and 'larger-than-local' perspective.</p> <p>Light industrial and manufacturing jobs are a very important element of the employment mix locally, and it is also recognised that macro economic shifts, such as increased demand for warehousing and logistics, need to be taken into account. However, a key economic priority for this Local Plan is to greatly diversify the employment land offer, in particular by increasing the amount of low cost and affordable workspace for SMEs and micro business, including those in the creative, cultural and digital industries. There is a need for the Local Plan to strike a careful balance, and this matter will be kept under close review.</p> <p>The Council also considers that the preferred option is necessary to incentivise and enable the renewal/redevelopment of employment sites, on which new development might not otherwise come forward. It is considered this approach will provide for high quality and modern business space, new homes and community facilities to meet local needs, along with improving the contribution a site makes to its locality in terms of its place qualities.</p>
Use mix on high streets	The emerging preferred approach of supporting increased flexibility for a mix of uses within town centres, i.e. a reduced emphasis on retail, is clearly supported in light of the national and local context. It is difficult to envisage benefits to the alternative approach, namely retaining the current approach whereby the proportion of A1 (retail) units along high streets must not fall below a set threshold.	<p>The Council recognises that there is clear support for the emerging preferred option. Regardless, there will be a need to keep the policy under close review in light of latest evidence in respect of retail trends and use of town centres as part of the Covid-19 economic recovery in 2021.</p> <p>The Council considers that the preferred option, which provides flexibility for a wider range of uses in town centres, is an appropriate response to the current challenges facing the High Street and will help to ensure they remain adaptable and resilient to changes over the long-term, including those related to the wider economy and consumer behaviour.</p>
Open space enhancement	There is clear support for the emerging preferred option, which allows flexibility to reconfigure existing areas of open space within development sites. However, there is a need for a note of caution in respect of biodiversity and heritage considerations, as some of the functions of existing open space may be challenging to recreate / replace (as part of reconfigured open space within a development site).	<p>The Council recognises that there is clear but caveated support for the emerging preferred option. The implication is a need to keep the policy under review.</p> <p>The Council considers that the preferred option will provide flexibility for development proposals to come forward where site constraints might otherwise pose feasibility issues. The preferred option will need to be supported by more detailed policies to ensure that any proposals for the reconfiguration of open space do not result in a net loss of open space, do not result in harm to or loss of biodiversity, and provide demonstrable improvements to the open space.</p> <p>Application of the Urban Greening Factor (UGF), under Policy GR4, will be an important means of ensuring that wide ranging 'greening' objectives are achieved as part of development schemes, including biodiversity objectives; however, it is recognised that there will additionally still be an important role for site specific work to identify key assets to be retained and enhanced. This is an important principle underpinning several policies in the plan.</p>

Policy issue	Assessment conclusion	Council response
Zero carbon development	<p>Whilst there is a need to maximise onsite emissions reductions (i.e. reductions below the levels required by Building Regulations) and therefore minimise residual onsite emissions that must be offset in order to achieve the London Plan definition of net zero development (which focuses on regulated emissions). However, there is invariably a need to allow flexibility for offsetting as part of any borough wide policy in support of zero carbon development. This is because it will often not be feasible or viable to reduce emissions to zero onsite. An effective way to minimise offsetting / maximise onsite reductions is through setting a high price per tonne of residual CO2.</p>	<p>The Council recognises that there is clear support for the emerging preferred option. Regardless, there will be a need to keep the policy under close review in light of latest understanding of best practice. This is a fast moving policy area nationally and within the London context. The Council agrees that there could be merit in exploring the price per tonne of residual carbon that developer are asked to pay as part of offsetting.</p>
Re-routing the South Circular at Catford	<p>There is wide-ranging support for rerouting the South Circular at Catford, as it is difficult to envisage effective town centre regeneration without the realignment; also, there is an opportunity to deliver a ground source heat pump array at the same time as the realignment works. Whilst it is recognised that there will be loss of an area of MOL, the loss of MOL is of limited significance.</p>	<p>The Council recognises that there is clear support for the emerging preferred option. Whilst acknowledging the important role that MOL plays in a highly urbanised setting, the re-routing of the South-Circular is critical to the comprehensive regeneration of Catford town centre, which will deliver wider public benefits through the delivery of new homes, including a high proportion of genuinely affordable housing; modern workspace and job opportunities; a revitalised civic and cultural hub with enhanced community facilities; and transformational public realm and environmental improvements. The Council recognises the Energy Masterplan proposal to deliver a ground source heat pump array at the same time as the road realignment, and will explore this matter further ahead of plan finalisation.</p>
Car parking	<p>The emerging preferred approach would involve a modest loosening of the ItP London Plan's proposed stringent approach to setting maximum parking standards or, in other words, a modest caveating of the ItP London Plan's broad brush support for car free and car light development. This approach is supported from a perspective of supporting communities and the needs of particular groups, in particular those with restricted mobility. There is also an argument to suggest that there is merit from a perspective of wishing to support modal shift towards walking, cycling and public transport, as the intention is to avoid problematic on-street parking; however, these arguments are not clear cut. There is also strong argument to suggest that the priority is to limit parking (Option 2) so as to encourage people to live without access to a personal car.</p>	<p>Setting car parking standards is invariably challenging. This is particularly in Lewisham, recognising that Public Transport Accessibility Levels vary greatly across the Borough and that not all train stations benefit from step-free access. Addressing the climate emergency is a stated priority for the Council, and the Local Plan seeks to address this by supporting a modal shift from private cars to walking, cycling and use of public transport. But equally there are important objectives around avoiding problematic onstreet parking and ensuring the local population (in particular, the less mobile) can safely and easily access services, facilities and employment. The emerging preferred option seeks to strike a careful balance; however, the Council recognises that there will be a need to keep the policy under close review, drawing upon consultation responses received.</p>

