

# Sustainability appraisal and strategic environmental assessment

Development Management Local Plan  
Submission Version

November 2013





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## Abbreviations

AA	Appropriate Assessment
AAP	Area Action Plan
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
CAZ	Central Activity Zone
CD&E	Construction, Demolition & Excavation Waste
CHP	Combined Heat and Power
C & I	Commercial & Industrial Waste
CSR	Corporate Social Responsibility
DCLG	Department for Communities and Local Government (formerly ODPM)
DEFRA	Department for Fisheries and Rural Affairs
DPD	Development Plan Document
DMLP	Development Management Local Plan
DLR	Docklands Light Railway
EC	European Community
EIA	Environmental Impact Assessment
EMS	Environmental Management System
EAA	Equalities Analysis Assessment
ER	Environmental Report
EU	European Union
GHG	Green House Gas
GIS	Geographical Information System
GLA	Greater London Authority
HIA	Health Impact Assessment
HRA	Habitats Regulations Assessment
LBL	London Borough of Lewisham
LDF	Local Development Framework
LDS	Local Development Scheme
LEL	Local Employment Location
LEZ	Low Emission Zone
LNR	Local Nature Reserve
LPA	Local Planning Authority

LA	Local Authority
MSW	Municipal Solid Waste
NHS	National Health Service
NO2	Nitrogen Dioxide
ODPM	Office of the Deputy Prime Minister (replaced by DCLG)
PPP	Policies, Plans and Programmes
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled of Ancient Monument
SAP	Sustainability Appraisal Panel
SEA	Strategic Environmental Assessment
SF	Sustainability Framework
SFRA	Strategic Flood Risk Assessment
SINC	Site of Importance Nature Conservation
SPA	Special Protected Area
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Urban Drainage Systems
SWMP	Site Waste Management Plan
SWMP	Surface Water Management Plan
TIA	Transport Impact Assessment
UDP	Unitary Development Plan
UK	United Kingdom

# 1 Non technical Summary

This document is the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the Lewisham DMLP Submission Version. This Report has been produced following consultation on the SA of the DMLP Proposed Submission Report (August – October 2013). No changes have been made to the DMLP between Proposed Submission and Submission stage, therefore the assessment within this SA is largely unchanged. The SA of the DMLP Further Options Report which is referred to in this document is available in Appendix II, p107.

The Lewisham DMLP is subject to a SA which must, where appropriate, incorporate the requirements of the SEA Directive (2001/42/EC). The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government's UK Sustainable Development agenda. The timing of the SA in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in the process of policy development.

The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This report is designed to meet the requirements of an "Environmental Report" as defined in the Directive and as set out in UK government guidance on Sustainability.

The Proposed Submission Report SA has recently been consulted on alongside the DMLP. Following this period of consultation, no amendments to policies have been made and no additional policies have been included. A complete list of the Policies of the DMLP is available in Appendix I, p74.

Predicted negative effects have been identified through-out the development of the DMLP and accordingly mitigation measures are recommended and have been made and incorporated into the DMLP in the form of policies and text. The following summarises the predicted cumulative effects

- *The Local Economy* – Positive long term effects for economic growth and employment are expected, with the retention and protection of employment land and the promotion of retail and business within the town centre. The mixed-use approach adopted by the policy options makes provision for housing, business and open spaces which meet high design standards and contribute to making Lewisham a desirable place to live and work. The effect of these measures is likely to improve the general appeal of Lewisham (and in particular the town centres) for both the public and potential investors, thereby contributing to growing the local economy. The DMLP is therefore expected to have a broadly positive effect on the Lewisham economy and community employment.

- *The Environment* - Broadly positive effects for the environment with improvements to air quality, reductions in noise and vibration, and enhancement of biodiversity and open spaces, expected. These policy options also contribute to mitigation for many of the adverse environmental impacts associated with development and economic growth. Furthermore, the recognition of the importance of sustainable design (including BREEAM and Code for Sustainable Homes standards) and promotion of measures to reduce car-use and congestion are also likely to reduce resource use and contribute to climate change adaptation and mitigation. The cumulative impact of multiple development projects occurring simultaneously will need to be considered at implementation/construction. These could exacerbate short term impacts relating to noise/vibration and air quality, however they can be mitigated through careful phasing of projects and considerate construction practices.
- *Society* – Likely to contribute to long term positive effects on the social fabric of the borough. Various policy options make provision for new high quality housing in a central and easily accessible location, new community facilities, improved public realm and social infrastructure, and a thriving economy and jobs market. These measures, if implemented in conjunction with associated policies designed to reduce adverse effects on the local community (including measures to reduce crime/the fear of crime, sensitive placement of residential housing in relation to noise/antisocial behaviour etc.) will ensure that communities are not adversely impacted by proposed development within Lewisham.

This report sets out the mitigation identified and which policies will ensure that the mitigation is addressed to ensure sustainable development is achieved.

The SEA Directive requires that the significant environmental effects of implementing a plan or programme should be monitored “in order to identify unforeseen adverse effects and to be able to undertake remedial action”. Responsible authorities must ensure when designing their monitoring arrangements that they comply with this provision.

This report summarises the process completed to date and, in addition, sets out a proposed list of monitoring activities currently being considered by the Boroughs for the DMLP; some of which have already been incorporated.

In compliance with the Habitats Directive (92/43/EEC), a Habitats Regulations Assessment Screening Report has been produced to accompany the DMLP. The screening report observes that none of the site allocations or policies in either plan at pre-submission stage, on their own or in combination with other plans or projects, are likely to result in significant adverse impacts on European Sites. The report’s conclusions are supported by Natural England.

## 2 Introduction and Methodology

### 2.1 Introduction

This report supports the preparation of the Lewisham Development Management Local Plan (DMLP).

This document is the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the Lewisham DMLP - Submission Version.

This Report has been produced following consultation of the SA on the DMLP Proposed Submission in August-October 2013. No changes were made to the DMLP between Proposed Submission and Submission stages and therefore the assessment within the SA has not changed. The SA of the DMLP Further Options Report which is referred to throughout this document is available in Appendix II, p107.

Table 2-1 below shows all previous SA Reports and DMLP Reports and the consultation period for each.

*Table 2-1 SA Reports and DPD Consultation Periods*

Sustainability Appraisal Reports	Local Plan (DMLP)	Consultation Period
Scoping Report 2005 Issues and Options Appraisal 2006	Issues and Options Paper 2005	May 2005
Sustainability Appraisal of the Preferred Options Report 2007	Preferred Options Report 2007	22 <sup>nd</sup> June to 3 <sup>rd</sup> August 2007
Revised Scoping Report 2011	N/A	2 <sup>nd</sup> December 2011 to 13 <sup>th</sup> January 2012
Sustainability Appraisal of the Further Options 2012	Further Options Report 2011	December 2012 to January 2013
Sustainability Appraisal Proposed Submission Report 2013	Development Management Local Plan Proposed Submission 2013	16 <sup>th</sup> August to 4 <sup>th</sup> October 2013
Sustainability Appraisal Submission Report 2013	Development Management Local Plan Submission 2013	N/A Submission mid-November

The SA seeks to identify the economic, social and environmental impacts of the different options presented in the DMLP. It includes a discussion of the likely significant effects of the implementation of the DMLP and recommendations are made in relation to ways in which likely adverse effects can be reduced or beneficial effects can be enhanced. The report includes proposals for relevant environmental indicators to monitor the effects of the implementation of the DMLP.

The findings of the SA are being made available to stakeholders, including statutory consultees, local authorities, and the public, in order to help all those with an interest to understand the effects of the proposed DMLP. This report should be read alongside the DMLP –Submission Version.

#### *2.1.1 Lewisham Development Management Local Plan*

The DMLP will provide a set of criteria based policies by which planning applications for new development and change of use will be assessed. These policies will implement the Lewisham Core Strategy and seek to ensure all proposed development accords with the spatial vision, objectives and strategy for the Borough.

The development management policies focus on the following issues:

- Protecting residential amenity;
- Ensuring adequate provision of housing;
- Facilitating environmental improvements;
- Protecting and managing a range of heritage assets;
- Addressing highway and transport issues;
- Protecting the viability and vitality of town centres and local employment areas;
- Addressing visual impact issues; and
- Providing a range of cultural and community facilities.

## **2.2 Sustainability Appraisal**

Under the Planning and Compulsory Purchase Act 2004 (PCPA), Local Authorities are required to undertake an SA for each of their local plans.

Guidance issued in November 2005 by the Office of the Deputy Prime Minister (ODPM) states that “The purpose of the SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans”.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government’s UK Sustainable Development agenda. The timing of the SA in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in policy development. Table 2-2 outlines the SA DCLG Guidance Stages.

Table 2-2 DCLG Guidance Stages

<b>DPD Stage 1: Pre-Production – Evidence Gathering</b>
<b>SA Stages and Tasks</b>
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and sustainability objectives.</li> <li>• <b>A2:</b> Collecting baseline information.</li> <li>• <b>A3:</b> Identifying sustainability issues and problems.</li> <li>• <b>A4:</b> Developing the SA framework.</li> <li>• <b>A5:</b> Consulting on the scope of the SA.</li> </ul>
<b>DPD Stage 2: Production</b>
<b>SA Stages and Tasks</b>
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• <b>B1:</b> Testing the DPD objectives against the SA framework.</li> <li>• <b>B2:</b> Developing the DPD options.</li> <li>• <b>B3:</b> Predicting the effects of the DPD.</li> <li>• <b>B4:</b> Evaluating the effects of the DPD.</li> <li>• <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial effects.</li> <li>• <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs.</li> </ul>
<p><b>Stage C: Preparing the Sustainability Report</b></p> <ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the SA Report.</li> </ul>
<p><b>Stage D: Consulting on the preferred options of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>• <b>D1:</b> Public participation on the preferred option of the DPD and the SA Report.</li> <li>• <b>D2(i):</b> Appraising significant changes</li> </ul>
<b>DPD Stage 3: Examination</b>
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D2 (ii):</b> Appraising significant changes resulting from representations.</li> </ul>
<b>DPD Stage 4: Adoption and monitoring</b>
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information.</li> </ul>
<p><b>Stage E: Monitoring the significant effects of implementing the DPD</b></p> <ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring.</li> <li>• <b>E2:</b> Responding to adverse effects.</li> </ul>

### 2.2.1 SA Approach

This Section outlines the DCLG SA stages and tasks (see Table 2-2) and indicates how the process has been undertaken for the DMLP. It also identifies which previous report was issued for consultation and which section of this report provides relevant evidence.

A series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005), the Preferred Options stage (2007) the Further Options stage (2012), and the Proposed Submission stage (2013). Consultation has included a range of techniques including written consultation, newsletters, online publications, stakeholder meetings and questionnaires.

### **DCLG Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.**

- A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.

The relevant plans, programmes and environmental protection objectives and the significance of these objectives with respect to the DMLP and the SA are discussed in the SA Report DMLP – Further Options report November 2012, set out in Appendix A.

- A2: Collecting baseline information.

Baseline information is set out to establish the current state of the area covered by the DMLP, and to identify trends in economic, environmental and social parameters. This information is then used to assess key issues that are evident in the area. The baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of dealing with them.

A Scoping Report was initially produced in 2005 and as a matter of good practice and given the time since the initial SA Scoping Report; a revised Scoping Report was issued in January 2011. The full baseline information is set out in the SA Scoping Report 2011.

- A3: Identifying sustainability issues and problems.

Identifying the sustainability issues and problems is an opportunity to define the key social, environmental and economic issues which needed to be taken into account when preparing the DMLP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Key sustainability issues were also identified through researching the baseline information, taking account of the results of workshops, and through other means of correspondence. Table 4-2 of this report summarises the key issues that the DMLP area currently faces in social, economic and environmental sustainability terms.

- A4: Developing the SA framework.

The SA Framework provides a method for describing, analysing and comparing the sustainability effects of plans and policies. The Sustainability Objectives that form the SA Framework were developed and consulted on as part of the SA Scoping process taking into account the relationship between the DMLP and the objectives of other plans and programmes, along with the findings of the baseline information review.

- A5: Consulting on the scope of the SA.

Views on the content of the SA Scoping Report 2005 and the Revised Scoping Report 2011, including the proposed approach to the appraisal, were taken into account through a formal statutory five week consultation period with the statutory consultees, including: Natural England, England Heritage, and the Environment Agency.

### **DCLG Stage B: Developing and refining options and assessing effects**

In the UK, the term 'options' is often referred to instead of 'alternatives'.

- B1: Testing the DPD objectives against the SA framework.

It is important that the aims and objectives of the DMLP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives to assist, where necessary, in refining the DMLP aims and objectives as well as in identifying options/alternatives.

The DMLP objectives were tested against the SA Framework in the form of a compatibility matrix within the DMLP Further Options SA Report 2012 (see Table 4-4 and Table 4-5) this appraisal was consulted on in 2012/2013 and consultation responses were received.

- B2: Developing and refining options and assessing effects.

DCLG Guidance states the following: "*Only **reasonable, realistic and relevant alternatives** need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each. Some alternatives are discrete, involving a choice between one alternative and another. These are often the broad options considered early in plan and programme preparation. Other alternatives can be combined in various ways. Alternatives may be grouped into scenarios, for instance rapid economic growth, 'most sustainable' option, etc.*" (Emphasis added).

- B3: Predicting the effects of the DPD and B4: Evaluating the effects of the DPD.

In developing the DMLP a series of options and alternatives were produced and set out in an initial Issues and Options Report which was produced in 2005. SA of these issues and options was undertaken between January and August 2006 and is

reported in Appendix B of the Preferred Options SA Report 2007. Consultation was carried out on both of these reports.

Following consultation on the Issues and Options Report (2005) and the Initial SA, a detailed range of draft policies which reflected the comprehensive coverage of the issues, options and preferred options identified by the DMLP process was produced.

The DMLP Preferred Options Report 2007 was produced along with an SA of the draft policies by LBL. This report is appended to the DMLP Further Options SA (see Appendix II)

The Preferred Options were chosen through a review of saved policies from the Lewisham Unitary Development Plan, a need to be in general conformity with the policies contained in the London Plan, a review of national planning requirements and the consultation responses received at the Issues and Options stage. Section 5 of this report discusses the reasons for choosing the Preferred Options in more detail and the likely significant effects on the environment of the DMLP including short, medium and long term-effects, permanent and temporary effects, and secondary, cumulative and synergistic effects. Full information on the options generation process undertaken to date is located within the DMLP Further Options Report 2012.

Further consultation on the DMLP Further Options Report March 2011 resulted in both significant and minor changes to policy and the addition of new policies; see section 5 of this report for further detail.

- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.

Section 5.6 of this report includes the recommendations identified from the SA process and how these were addressed within the Plan.

- B6: Proposing measures to monitor the significant effects of implementing the DPDs.

Section 6.1.2 of this report sets out a proposed list of monitoring activities currently being considered. Monitoring arrangements will be finalised following examination in 2013.

### **DCLG Stage C1: Reporting**

- C1: Preparing the SA Report

### **DCLG Stage D Consulting on the preferred options of the DPD and SA Report**

- D1: Public participation on the preferred option of the DPD and the SA Report.
- D2(i): Appraising significant changes

### 2.3 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is a statutory assessment process. It ensures that significant environmental effects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision-makers, monitored and that opportunities for public involvement are provided.

An SEA is required on all plans and programmes by European Community Directive (2001/42/EC) 'on the assessment of the effects of certain plans and programmes on the environment'. Known as the 'SEA Directive', it is implemented in England through the Environmental Assessment of Plans and Programmes Regulations (Statutory Instrument 1633 2004).

The UK Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process that considers economic and social as well as environmental effects.

Sustainability Appraisals must, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/42/EC) (SEA Directive). The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into UK law through the SEA Regulations (July 2004). Table 2-3 outlines the SEA Directive Requirements and how these requirements have been addressed within this report.

Table 2-3 SEA Directive Requirements

SEA Directive Requirements	Where reported
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	This SA report.
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 of this report.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
c) The environmental characteristics of areas likely to be significantly affected;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
d) Any existing environmental problems which are relevant to the plan 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;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
e) The environmental protection objectives, established at	Section 4.1 and Appendix A

SEA Directive Requirements	Where reported
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;	the DMLP – Further Options SA (see Appendix II).
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. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Section 5 of this report. Plus Appendices C, D, and E the DMLP – Further Options SA (see Appendix II).
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;	Section 5.3 of this report.
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;	Section 2 of the DMLP
i) A description of measures envisaged concerning monitoring in accordance with Article 10;	Section 6 of this report.
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>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).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process.</p> <p>Table 5-1 in this report.</p> <p>Tables 5-1, 5-2 and 5-3 of the DMLP – Further Options SA (see Appendix II) summarise the consultation responses received on the SA of the Preferred Options and how these have been addressed.</p>
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	N/A
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process.</p> <p>Table 5-1 in this report.</p> <p>Tables 5-1, 5-2 and 5-3 of the DMLP – Further Options SA (see Appendix II) summarise the consultation responses received on the SA of the Preferred Options and how these have been addressed.</p>

SEA Directive Requirements	Where reported
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	<p>To be confirmed following examination.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>To be confirmed following examination.</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This table identifies how the requirements have been met.</p>

#### 2.4 Equalities Analysis Assessment

An Equalities Analysis Assessment has been carried out; it assessed each of the new policies introduced in the DMLP Further Options Report, which may potentially impact on the protected characteristics of equalities groups. The results are summarised in section 5.3 of this report.

#### 2.5 The Habitat Regulations Assessment (HRA)

A Stage 1 Habitats Regulations Assessment was undertaken in April/May 2013 on the DMLP at pre-submission stage, in compliance with the Habitats Directive (92/43/EEC) and the Regulations. See section 5.4 for full details.

## 3 Background

### 3.1 Lewisham Development Management Local Plan Context

The DPD was initially part of a combined Development Policies and Site Allocations DPD (2005). Since that time, a decision has been made to separate the two DPDs; one for site allocations and the other for development management policies.

The DMLP will set out the Council's planning policies for managing development and will be used to guide, assess and determine planning applications. The plan will support the implementation of the Lewisham Core Strategy and The London Plan and will need to be read alongside the Site Allocations Local Plan, the Lewisham Town Centre Local Plan, the Catford Town Centre Local Plan and any other relevant Council supplementary planning documents (SPDs).

### 3.2 Lewisham Development Management Local Plan Objectives

The DMLP will provide further detail to the Core Strategy policies to support its implementation. The objectives of the DMLP are as follows:

1. To facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the Core Strategy's strategic objectives.
2. To facilitate development which protects and enhances the amenity of the local area.
3. To ensure a high standard of design.
4. To create safe, attractive, accessible and functional environments for all.
5. To secure development that helps create a more sustainable Lewisham.

The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development. The Council sees development management as a positive and proactive approach to shaping, considering, determining and delivering development proposals. The emphasis is on collaboration instead of negotiation; coming to a balanced agreement which solves problems rather than a compromise which doesn't meet everyone's objectives.

The process is led by the LBL, working closely with those proposing developments and others, particularly the local community. It is undertaken in the spirit of partnership and inclusiveness, and supports the delivery of key priorities and outcomes. The policies to be included within the DMLP positively promote sustainable development and help implement the Core Strategy.

It is important to note that development management retains the established practice of proper consideration and transparent determination of planning applications and does not mean allowing unacceptable development.

### 3.3 Further Options

The Further Options stage was the third round of public consultation for the DMLP and follows on from the Preferred Options consultation in 2007. The Further Options stage is undertaken in the consideration and context of:

- adoption of the Core Strategy in June 2011;
- preparation of a separate Site Allocations Local Plan rather than a combined plan with the development management policies (as was the case in 2007). The Site Allocations Local Plan was adopted by the Council in June 2013;
- A review of the planning system by the Government and the publication of a National Planning Policy Framework (NPPF). The NPPF came into force on 28 March 2012 and replaces all national Planning Policy Statements (PPS) and Planning Policy Guidance (PPG); and
- Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This outlines the procedures for the preparation of a local plan, prior to its publication (the draft plan).

It is important that the aims and objectives of the DMLP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives to assist, where necessary, in refining the DMLP aims and objectives as well as in identifying options.

### 3.4 Proposed Submission

The Proposed Submission stage was the final round of public consultation for the DMLP with consultation comments invited on the 'soundness' of the plan and whether it met the legal requirements.

Any representation made at this stage will be submitted to the Secretary of State and will be examined by a Planning Inspector as part of the Examination in Public process.

## 4 Context, Baseline and SA Objectives

### 4.1 Links to Other International, National, Regional, Local Plans and Programmes

This section summarises plans and programmes and related sustainability objectives established at other levels of the planning system that are relevant to the SA of the DMLP. These include national and international policy and objectives where they are relevant.

Table 4-1 provides a list of those reviewed in the context of the DMLP. Appendix A: Policies, Plans and Programmes of the SA Further Options Report (see Appendix II) provides further details on these explaining their relevance to the DMLP and the SA and how they have been considered during the SA process.

The relevant strategic and local plans and programmes and documents reviewed were:

*Table 4-1 Plans Policies and Programmes*

<b>Plans, Policies and Programmes</b>
<b>International</b>
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)
The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) (2002)
Convention concerning the Protection of the World Cultural and Natural Heritage (UNESCO) (1972)
<b>European Union</b>
European Spatial Development Perspective (ESDP) (1999)
EU Sustainable Development Strategy (EU SDS) (2001)
European Community Biodiversity Strategy (1998)
European spatial declaration on sustainable development Proponent body European Union (1999)
Sixth Environment Action Programme of the European Community (2002 – 2012)
European Directive on Ambient Air Quality Assessment and Management (96/62/EC)
European Directive on Establishing a Scheme for Greenhouse Gas Allowance Trading (2003/87/EC)
European Directive on Landfill (99/31/EC)
European Waste Framework Directive (75/442/EEC, as amended in 1991)
European Directive on the Conservation of natural habitats and of wild fauna and flora (The Habitats Directive 92/43/EEC)
European Directive on Conservation of Wild Birds (79/409/EEC) (1979)
European Directive 2000/14/EC (Noise)

Plans, Policies and Programmes
European Water Framework Directive (2000/60/EC)
European Directive 2001/42/EC (SEA Directive)
European Union Nitrates Directive (1991)
<b>National</b>
Environmental Assessment of Plans & Programmes Regulations (Statutory Instrument 2004 No.1633)
Planning and Compulsory Purchase Act (2004)
Localism Act (2011)
Town And Country Planning Act (1990)
Planning and Energy Act (2008)
Energy Act (2008)
The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010 (Statutory Instrument 2010 No.653.)
The UK Climate Change Act (2008)
Planning Policy Statement 10: Planning for Sustainable Waste Management (Department for Communities and Local Government) (2011)
Community Infrastructure Levy: An overview (Department for Communities and Local Government) (2011)
By Design: Urban Design in the Planning System – Towards Better Practice (Department for Communities and Local Government) (2000)
Planning and access for disabled people: A good practice guide (Department for Communities and Local Government) (2003)
National Air Quality Strategy 'Working together for clean air' (DEFRA) (2000)
Homes for the future – more affordable, more sustainable (Department for Communities and Local Government) (2007)
Energy White Paper 2003: Our energy, our future: creating a low carbon economy
Waste Strategy for England (DEFRA) (2007)
Creating a better place strategy 2010-2015 (Environment Agency)
Thames Catchment Flood Management Plan Summary Report – Managing Flood Risk (Environment Agency) (2009)
TE2100 Flood Risk Management Plan (Environment Agency) (2012)
Thames River Basin Management Plan (Environment Agency) (2009)
Climate Change and the Historic Environment (English Heritage) (2007)
Guidance on the Setting of Heritage Assets (English Heritage) (2011)
Building in Context (English Heritage and CABE) (2007)
Streets for All (English Heritage) (2006)
<b>Regional (London)</b>
The Mayor's Air Quality Strategy 'Clearing London's Air' (Greater London Authority (GLA), 2010)

Plans, Policies and Programmes
The Mayor's Economic Development Strategy for London (GLA, May 2010)
Connecting with London's nature: The Mayor's Biodiversity Strategy (GLA, July 2002)
Cultural Metropolis: The Mayor's Cultural Strategy – 2012 and Beyond (2010)
The London climate change adaptation strategy: Summary draft report (Greater London Authority, August 2008)
The draft Climate Change Adaptation Strategy for London, (GLA, February 2010)
The London Housing Strategy (GLA, February 2010)
The Mayor's Transport Strategy (GLA, May 2010)
The Mayors Draft Municipal Waste Management Strategy: London's Wasted Resource (GLA, January 2010)
Souder City: The Mayor's Ambient Noise Strategy (GLA, March 2004)
Connecting Londoners with Trees and Woodlands: A Tree and Woodland Framework for London (GLA, March 2005)
London View Management Framework SPG, GLA (2011)
The London Rivers Action Plan - A tool to help restore rivers for people and nature (2009).
Local (Lewisham)
Lewisham Core Strategy 2011-2026 (adopted June 2011)
Lewisham Unitary Development Plan 2004 (saved policies)
Lewisham Sustainable Community Strategy 2008 – 2020
Community Safety Strategy Safer Lewisham Plan 2009-2010
Lewisham Regeneration Strategy 2008-2020
Healthier Communities – A health and well-being framework for Lewisham
Lewisham Borough Sports Plan 2010- 2013
Social Inclusion Strategy 2005- 2013
Local Biodiversity Action Plan – A Natural Renaissance for Lewisham 2006-2011
Lewisham Housing Strategy 2009 -2014
Better futures: Lewisham's Homelessness Prevention Strategy 2009-2014
Lewisham Children and Young People's Plan 2009-2012
Draft Lewisham Municipal Waste Strategy 2009/10
Lewisham Carbon Reduction and Climate Change Strategy (2008)
Lewisham Local Air Quality Action Plan (2008)
Fourth Round Updating and Screening Assessment For London Borough of Lewisham (2009)
Lewisham Strategic Flood Risk Assessment (2008)
Lewisham Flood Risk and Development Sequential Test (2009)
Lewisham Local Implementation Plan 2011 – 2012

Plans, Policies and Programmes
Lewisham Borough-wide Transport Assessment (2009)
Deptford and New Cross Transport Infrastructure Study (2008)
Lewisham Employment Land Study (2008)
Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (2009)
Lewisham Leisure and Open Space Study (2009)
Lewisham Retail Capacity Study (2009) and Addendum (2010)
Lewisham Strategic Housing Market Assessment 2008 and the South East London Sub-regional (2009)
Lewisham Infrastructure Delivery Plan (2010)
South East London Boroughs' Waste Apportionment Paper (2010)
Ravensbourne River Corridor Improvement Plan (2010)
Lewisham Borough Wide Character Study (2010)
Town Centre Health Checks (2012)
Lewisham Conservation Area Management Plans (Various)
Healthy Weight Healthy Lives (2009)
Lewisham Housing Conversions Study (2012)
Lewisham Tall Buildings Study (2010)
Pubs in Lewisham Study (2012)
Hot food take-away shops study (2013)

#### 4.2 Current and Predicted Future Social, Environmental and Economic Baseline Characteristics

Baseline information is set out to establish the current state of the area covered by the DMLP, and to identify trends in economic, environmental and social parameters. This information is then used to assess current sustainability issues that are evident.

The review of baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of addressing them. This information was reported in the SA Scoping Report July 2005 and was reviewed and updated for the SA Report 2011.

The identification of sustainability issues is an opportunity to define the key social, environmental and economic factors which need to be taken into account when preparing the DMLP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Since the preparation of the original scoping report for the DMLP, a series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005), the Preferred Options stage (2007), the Further Options stage (2012) and the Proposed Submission stage (2013). Consultation has included a range of techniques including written consultation, newsletters, online publications, stakeholder meetings and questionnaires.

The social, economic and environmental issues that were identified following each of these consultation periods and through collection of baseline data are detailed in the SA Scoping Report November 2011 and summarised in Table 4-2 below:

Table 4-2 Key Sustainability Issues

Key Sustainability issues
<p><b>Economic</b></p>
<p><b>Local employment / training opportunities</b></p> <p><b>High commuter population working outside of the Borough of Lewisham</b></p> <p><b>Fostering the borough's creative industries</b></p> <ul style="list-style-type: none"> <li>• There is a need to create and sustain employment and training opportunities in the borough to enhance the local economy. Opportunities need to be taken to support and retain local employment growth sectors.</li> <li>• The Borough has recognised clusters of creative industries. There is a need to ensure employment areas and mixed use development provides suitable accommodation for this use.</li> </ul> <p><b>Provide and protect local shopping areas</b></p> <p>2. Population growth will result in a need to enhance the vitality of local shopping areas, including markets, to reduce the need to travel outside the Borough for goods and services.</p>

<b>Key Sustainability issues</b>
<p><b>Finding a balance between meeting housing targets and maintaining economic and cultural vitality</b></p> <ul style="list-style-type: none"> <li>• A general conflict between meeting housing targets and protecting sites for other uses such as employment, retail, education, health, community in a built up environment.</li> </ul>
<b>Environmental</b>
<p><b>Protecting and improving biodiversity and natural habitats including local waterways</b></p> <ul style="list-style-type: none"> <li>• Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered decline.</li> <li>• The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</li> <li>• The continued protection and enhancement of the Borough's 70 sites designated as Sites of Importance to Nature Conservation and 19 Local Nature Reserves.</li> </ul>
<p><b>CO<sub>2</sub> emissions contributing to climate change</b></p> <ul style="list-style-type: none"> <li>• Climate change due to greenhouse gas emissions is likely to affect the natural environment. The Borough will need to adapt to these changes and find ways of reducing carbon emissions. The domestic sector is the largest contributor to CO<sub>2</sub> emissions in Lewisham. The largest contributor to domestic emissions is space heating and cooling, which produce three times as many as either water heating or appliances and ten times as many as lighting.</li> </ul> <p><b>Climate change impacts</b></p> <ul style="list-style-type: none"> <li>• Climate change will have an impact on biodiversity, health, flooding, the historic environment, the urban environment such as heat island effect, increased surface water flooding and extreme weather conditions.</li> </ul> <p><b>Climate change mitigation</b></p> <ul style="list-style-type: none"> <li>• CO<sub>2</sub> emissions can be reduced as part of a new development through improved energy efficiency, provision and promotion of renewable energy, improved water efficiency and less reliance on the private car.</li> </ul> <p><b>Climate change adaptation</b></p> <ul style="list-style-type: none"> <li>• A range of adaptation measures will need to be adopted including SUDS, flood defence, green infrastructure, green walls/roofs and more sustainable transport etc.</li> </ul>
<p><b>Traffic congestion and car dependence</b></p> <ul style="list-style-type: none"> <li>• A growing population will place pressure on the road network and existing public transport. There is a need to locate development near existing transport links; improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking.</li> </ul> <p><b>High levels of air and noise pollution</b></p> <ul style="list-style-type: none"> <li>• The Borough of Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.</li> </ul>
<p><b>Managing soil contamination and reducing the risk of land contamination</b></p> <ul style="list-style-type: none"> <li>• An understanding of the solid and superficial geology is essential in order to</li> </ul>

Key Sustainability issues
<p>determine whether potentially contaminated sites are likely to have an impact on controlled waters or adjacent sites. Land contamination from historical sources poses a particularly high risk to groundwater used for human consumption in the area of the Lower Ravensbourne valley between Lewisham and Deptford. Criteria will be a necessary in the consideration of risk assessment processes applied to a site evaluation when development is proposed.</p> <p><b>Protect and provide opportunities to enhance local heritage assets (cultural, archaeological and historic) from redevelopment and recognise the beneficial contribution that the historic environment can make to an area</b></p> <ul style="list-style-type: none"> <li>• Lewisham has 27 Conservation Areas and 357 designated heritage asset entries of which: <ul style="list-style-type: none"> <li>○ 323 are Grade II Listed Buildings (many of which represented groups of buildings)</li> <li>○ 28 are Grade II* Listed Buildings (many of which represented groups of buildings)</li> <li>○ 2 are Grade I Listed Buildings (Boone's Chapel in Lee High Road and St Paul's Church in Deptford)</li> <li>○ 3 are Historic Parks and Gardens</li> <li>○ 1 is a Scheduled Ancient Monument</li> </ul> </li> <li>• The Borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development where appropriate. Social and economic benefits can arise from a well maintained and respected historic environment.</li> </ul> <p><b>Certain areas within Deptford New Cross and along the Borough's river network are within Flood Zone 3a (high probability)</b></p> <ul style="list-style-type: none"> <li>• Climate change is predicted to increase adverse weather patterns leading to more intense and severe flooding. There is a need to reduce and manage flood risk (including sewer flooding). Approximately 21,000 properties are at risk of flooding from tidal and river sources (16%) of all properties. Water and sewerage infrastructure may be necessary in flood risk areas.</li> </ul> <p><b>Low levels of recycling and the need to reduce total waste production</b></p> <ul style="list-style-type: none"> <li>• There is a need to reduce waste generation and improve recycling and composting rates and manage waste within the Borough boundary.</li> </ul>
Social
<p><b>High demand for housing, however affordability remains an issue as the population continues to grow</b></p> <ul style="list-style-type: none"> <li>• There has been a decline in the proportion of detached and semi-detached houses and an increase in the number of single houses converted into flats. The London Plan requires at least 11,050 new residential dwellings to be built in the Borough by 2021. The average household income is insufficient to buy a house.</li> </ul>
<p><b>Improved access to health care, education, community and cultural facilities</b></p> <ul style="list-style-type: none"> <li>• Ensure health, education, community and cultural facilities are provided to accommodate the needs arising from new developments and meet existing needs. Loss of such facilities needs to be assessed to determine appropriate replacement or re-provision.</li> </ul>

Key Sustainability issues
<p><b>General perception of high crime</b></p> <ul style="list-style-type: none"> <li>Though the Borough has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment.</li> </ul> <p><b>Addressing deprivation, social exclusion and health inequalities</b></p> <ul style="list-style-type: none"> <li>London Borough of Lewisham is the 31st most deprived local authority in England. Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot wards have the highest concentration of deprivation and are placed in the 10 per cent most deprived.</li> <li>There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</li> </ul>
<p><b>Provision of, and access to, open space, community, cultural and recreational facilities</b></p> <ul style="list-style-type: none"> <li>Future growth in housing will result in a lower proportion of open space per 1,000 people. Opportunities to provide additional open spaces from potential developments and improve access to existing spaces, must be used to improve health and well-being.</li> <li>The provision of a range of community, cultural and recreational facilities needs to be monitored to ensure adequate provision and access.</li> </ul>

#### 4.2.1 Economic climate

There have been significant changes in the UK property market in recent years, largely in response to the impact of the “credit crunch” and recent period of recession. Public spending, as set out in the Government’s Public Sector Spending Review (October 2010), will be severely constrained within the next 5-10 years. It is important that the DMLP policies are reviewed to ensure that they remain robust and credible in the context of the current and projected property market and public sector spending regime.

### 4.3 Sustainability Appraisal Objectives, Targets and Indicators

The SA objectives provide a method for describing, analysing and comparing the sustainability effects of plans and policies. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the DMLP and the objectives of other plans and programmes, along with the findings of the baseline information review.

The SA objectives were developed and consulted on as part of the SA scoping process in 2005 and 2011. These objectives were refined and augmented over the course of the process to reflect the changing sustainability concerns of the Borough.

These objectives formed the basis for the SA Framework within which the evaluation of different DMLP options and policies has been carried out; these are presented in Table 4-3 below.

The full list of SA objectives including, targets and indicator sources are available in Appendix B of the SA DMLP – Further Options (see Appendix II).

Table 4-3 Sustainability Appraisal Objectives

Ref	Topic	Sustainability Appraisal Objectives
<b>Economic</b>		
1	Population, human health	To encourage sustained economic growth across a variety of sectors
2	Population, human health	To encourage and promote employment and new enterprises in Lewisham Borough
<b>Environmental</b>		
3	Material assets	To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates
4	Climatic factors, water, air	To use and manage the consumption of natural resources in a sustainable manner
5	Biodiversity, flora and fauna, population, material assets	To protect and enhance the borough's open spaces
6	Biodiversity, flora and fauna, population	To conserve and enhance the Borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the Borough
7	Air, population, human health	To improve air quality and reduce noise and vibration
8	Population, human health, air	To reduce car travel and improve accessibility by sustainable modes of transport
9	Climatic factors, water, air	To mitigate, and adapt to the impact of climate change
10	Climatic factors, water	To reduce and manage flood risk
11	Soil	To reduce land contamination and safeguard soil quality and quantity
12	Cultural heritage, material assets	To maintain and enhance landscapes and townscapes
13	Cultural heritage	To conserve and enhance heritage assets and use in the creation of sustainable places
<b>Social</b>		
14	Material assets, population, human health	To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home
15	Population, human health	To improve the health and well-being of the population and reduce health inequalities
16	Population, human health	To address deprivation, promote social inclusion and ensure equitable outcomes for all communities
17	Population, human health, material assets	To provide for the improvement of education, skills and training
18	Population, human health	To enhance community safety by reducing crime, anti-social behaviour and the fear of crime
19	Population, human health, material assets	To improve accessibility to leisure and cultural facilities, community infrastructure and key local services

#### 4.3.1 Sustainability Appraisal of the DMLP objectives

It is important that the aims and objectives of the DMLP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives (Table 4-4) to assist, where necessary, in refining the DMLP aims and objectives as well as in identifying options. The objectives are listed in section 3.2 of this report (p14).

#### 4.3.2 Results of the Sustainability Appraisal of the DMLP objectives

The appraisal carried out to test the DMLP objectives against each SA objective was undertaken and consulted on in the SA Further Options Report 2012. The results of the comparison showed that the DMLP objectives were consistent with the SA objectives.

Table 4-4 Key to SA Appraisal of the DMLP Objectives

Score	Description of relationship between DMLP & SA objectives
✓	Beneficial relationship – where the objectives are very closely allied in their purpose and intended outcome and will deliver a clear benefit.
✗	Conflicting relationship – when the objectives have conflicting purposes or will lead to a negative outcome on implementation.
•	No direct relationship – where there is not a clear relationship between the two objectives.
?	Uncertain relationship – where the relationship between the two objectives is ambiguous and it is not clear if there is a beneficial, conflicting or even a direct relationship between the two objectives.

Table 4-5 SA Appraisal of the DMLP Objectives

SA objectives	DMLP objectives				
	1	2	3	4	5
<b>Economic</b>					
1. To encourage sustained economic growth across a variety of sectors	✓	•	•	•	✓
2. To encourage and promote employment and new enterprises in Lewisham	✓	•	•	•	✓
<b>Environmental</b>					
3. To minimise the production of waste across all sectors and increase reuse, waste recovery	✓	•	•	•	✓

SA objectives	DMLP objectives				
	1	2	3	4	5
and recycling rates					
4. To use and manage the consumption of natural resources in a sustainable manner	✓	✓	•	•	✓
5. To protect and enhance the Borough's open spaces	✓	✓	✓	✓	✓
6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the Borough	✓	✓	✓	✓	✓
7. To improve air quality and reduce noise and vibration	✓	✓	•	•	✓
8. To reduce car travel and improve accessibility by sustainable modes of transport	✓	•	•	✓	✓
9. To mitigate and adapt to the impact of climate change	✓	✓	•	•	✓
10. To reduce and manage flood risk	✓	✓	•	✓	✓
11. To reduce land contamination and safeguard soil quality and quantity	✓	✓	✓	✓	✓
12. To maintain and enhance landscapes and townscapes	✓	✓	✓	✓	✓
13. To conserve and enhance heritage assets and utilise the heritage environment in the creation of sustainable places	✓	✓	✓	✓	✓
<b>Social</b>					
14. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home	✓	•	•	•	✓
15. To improve the health and well-being of the population and reduce health inequalities	✓	•	•	•	✓
16. To address deprivation, promote social inclusion and ensure equitable outcomes for all communities	✓	•	•	✓	✓
17. To provide for the improvement of education, skills and training	✓	•	•	•	✓
18. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime	✓	✓	✓	✓	✓
19. To improve accessibility to leisure and cultural facilities, community infrastructure and key local services	✓	•	•	•	✓

## 5 DMLP Options and Alternatives

The following sections identify the issues and associated options that were considered during development of the DMLP.

### 5.1 Main Strategic Alternatives Considered and How They Were Identified

#### 5.1.1 *Options and Alternatives 2005/2006*

In developing the DMLP a series of options and alternatives were produced and a sustainability commentary on the proposed options was prepared. This highlighted potential conflict or issues and opportunities and aimed to strengthen the delivery of the sustainability objectives.

This SA Report should be read in conjunction with the Issues and Options Report (2005) and Appendix B of the Preferred Options SA Report (2007) prepared by LBL which discusses the issues and options in full details. Both reports are available in Appendix II – Sustainability Appraisal Development Management Local Plan – Further Options.

#### 5.1.2 *Preferred Options*

Following consultation on the Issues and Options Report (2005) and the initial SA, a detailed range of draft policies, which reflected the comprehensive coverage of the issues, options and preferred options identified by the DPD process, was produced. The DPD Preferred Options Report (2007) was accompanied by a SA of the draft policies produced by the LBL. The assessment undertaken is contained within Appendix II – Sustainability Appraisal Development Management Local Plan – Further Options.

#### 5.1.3 *Consultation on the SA of the Preferred Options*

Consultation on the Preferred Options was in accordance with LBL's Statement of Community Involvement (SCI). This included statutory and non-statutory organisations and over 1,500 residents, businesses and community groups. The statutory consultees included Natural England, the Environment Agency and English Heritage. Comments were received from Natural England, the Environment Agency and Brockley Cross Action Group.

The consultation responses received from each of these consultees and explanation on how the issues raised have been addressed are available in tables 5-1, 5-2 and 5-3 of the SA DMLP – Further Options (see Appendix II).

#### 5.1.4 *Development Management Local Plan – Further Options*

Following consultation on the Preferred Options Report (2007) and the accompanying SA, a list of further policy options was produced. The DMLP – Further Options (2012) was accompanied by a SA of these policies (see Appendix II – Sustainability Appraisal Development Management Local Plan – Further Options).

### 5.1.5 Consultation on the SA of the Further Options

Consultation on the DMLP – Further Options and accompanying SA was undertaken in 2012/2013. Comments from consultation have been taken into account in the finalisation of the DMLP and SA – Proposed Submission Version. The full list of policies is available in Appendix I – DMLP Policies.

Table 5-1, below, summarises the comments received on the SA following consultation on the DMLP – Further Options.

*Table 5-1 DMLP – Further Options SA consultation response*

Consultee	Comment summary
English Heritage	Seek to ensure that the SA demonstrates that the Council's approach to this policy issue both conserves and enhances the borough's heritage assets and wider historic environment.
Green Party	Challenges the SA's suggestion of a negative impact caused by trees using up water.

### 5.1.6 Development Management Local Plan – Proposed Submission

Following consultation on the Further Options Report (2013) and the accompanying SA, the Proposed Submission Report (2013) was produced. The DMLP – Proposed Submission Report (2013) was accompanied by a SA of these policies. There have been no changes to the DMLP between Proposed Submission and Submission versions, therefore the SA for the Proposed Submission version remains valid.

### 5.1.7 Consultation on the SA of the Proposed Submission

No comments were received on the SA of the DMLP – Proposed Submission Report.

## 5.2 DMLP Policies

### 5.2.1 Significant environmental effects of the policies and proposals

The SEA Directive and related UK regulations require the SA to identify, describe and evaluate the likely significant effects on the environment of implementing the DPD.

The prediction of likely effects involves adopting an evidence based approach to:

- Identify the changes to the environmental baseline which are predicted to arise from the implementation of the DPD.
- Describe these changes in terms of their magnitude, geographical scale, time period over which they will occur, whether they are permanent or temporary, positive or negative, the level of probability of the effect eventuating and any secondary, cumulative and/or synergistic effects.

Predictions and evaluations may be both qualitative and / or quantitative but must be based on evidence. The SA expresses the likely predicted and evaluated effects of the DPD with a series of matrix tables, using a scaled approach as shown below.

Table 5-2 Key Matrix Scores

Symbol	Meaning
++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
	Depends upon implementation
0	Neutral impact identified
+/-	Positive and negative impacts identified
?	Unknown impact

### 5.2.2 Assessment of the DMLP – Submission Version

The DMLP – Submission Version Policies, presented in Table 5-3 and available in full in Appendix I – DMLP Policies were assessed in terms of their impact against the SA objectives, set out in Table 4-3 Sustainability Appraisal Objectives.

Table 5-3 DMLP – Submission Version Policies

Topic & Policy Options
<b>Housing (Homes for All)</b>
1. Presumption in favour of sustainable development
2. Prevention of loss of existing housing
3. Conversion of a single dwelling to two or more dwellings
4. Conversions of office space and other B Use Class space into flats
5. Sheltered housing and care homes
6. Homes in Multiple Occupation (HMO)
7. Affordable rented housing
8. Student Housing
<b>Employment Land</b>
9. Mixed Use Employment Locations
10. Local Employment Locations (LEL)
11. Other Employment Locations
<b>Retail and town centres</b>
12. Hotels
13. Location of Main Town Centre Uses

Topic & Policy Options
14. District Centres Shopping Frontages
15. Neighbourhood Local Centres
16. Local Shopping Parades and Corner Shops
17. Restaurants, Cafés (A3), and Drinking Establishments (A4)
18. Hot Food Take-away Shops (A5)
19. Shopfronts, Signs and Hoardings
20. Public Houses
21. Mini Cab or Taxi Offices
<b>Climate change and environmental management</b>
22. Sustainable Design and Construction
23. Air Quality
24. Biodiversity, living roofs and artificial playing pitches
25. Landscaping and Trees
26. Noise and Vibration
27. Lighting
28. Contaminated Land
<b>Transport</b>
29. Car Parking
<b>Promoting good design</b>
30. Urban Design and Local Character
31. Alterations and extensions to existing buildings including residential extensions
32. Housing Design, Layout and Space Standards
33. Development on Infill Sites, Backland Sites, Back Gardens and Amenity Areas
34. Thames Policy Area and Deptford Creekside
35. Public Realm
36. New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens
37. Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest
38. Demolition or substantial harm to designated and non-designated heritage assets

Topic & Policy Options
39. Domestic Satellite Dishes and other Telecommunications Equipment
40. Public Conveniences
<b>Community services</b>
41. Innovative community facility provision
42. Nurseries and Childcare
43. Art, Culture and Entertainment Facilities
44. Places of Worship

### 5.2.3 Results of new policy appraisals following Further Options

Following consultation on the DMLP – Further Options and accompanying SA, several policies have been changed. Some policies have been altered significantly whilst others have only been adjusted slightly to reflect comments made. Whilst some of these changes have had an impact on the SA of the DMLP, others have not been of a material nature and as such have not necessitated further appraisal.

Table 5-4, below lists the DMLP policies, summarise the changes that have been made to each policy and highlights the impact this has had on the sustainability objectives. This table is to be read in conjunction with section 5.3 (p41) and Appendix E – Policy Appraisal Matrix of the SA DMLP – Further Options (see Appendix II).

### 5.2.4 No changes following Proposed Submission

Following consultation on the DMLP – Proposed Submission and accompanying SA, no changes to policies have been made. Accordingly there have been no further changes made to the appraisal of sites in Table 5-4 DMLP.

Some changes to policies and justification text are suggested by the Council and these suggestions will be submitted to the Planning Inspectorate and will be considered as part of the Examination in Public. If any changes arise from the Examination in Public further assessment and a SA of changes may be required.

Table 5-4 DMLP – Submission Version Policies Appraisals

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>1</b> Presumption in favour of sustainable development	++	++	-	-	0	0	-	0	+/l	+/l	0	+/l	0	-	+	+	+	0	+	No change.	No additional assessment needed following consultation on DMLP - Further Options.
<b>2</b> Prevention of loss of existing housing	-	-	+	+	0	l	-	0	-/l	-/l	+/l	+/l	++	++	+	0	0	0	0	No change.	No additional assessment needed following consultation on DMLP - Further Options.
<b>3</b> Conversion of a single dwelling to two or more dwellings	0	0	+	+	0	+/l	-	0	-/l	-/l	+/l	+/l	++	++	+	0	0	0	0	Based on DMLP - Further Options Policy 3; consolidated to emphasise that conversions will only be allowed in strict circumstances.	1, 2 - Land use competition may occur with other sectors. 3-14 - No additional assessment needed following consultation on DMLP - Further Options. 15 – Potential positive impacts may arise by providing additional housing infrastructure in areas with low levels of social inclusion. 16 -19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>4</b> Conversions of office space and other B Use Class space into flats	-	-	+	+	0	+/l	-	0	-/l	-/l	+/l	+/l	++	++	+	0	0	0	0	Based on DMLP - Further Options Policy 3; removed references to shopping and retail properties.	1, 2 – Will lead to loss of office space. 3-14 - No additional assessment needed following consultation on DMLP - Further Options. 15 – Potential positive impacts may arise by developing housing infrastructure in areas with low levels of social inclusion. 16 -19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>5</b> Sheltered housing and care homes	l	l	-/l	-/l	-/l	-/l	-	++	-	-	-	-	++	++	+	+	-/l	+/l	++	Similar to Further Options Policy 4. Slight rewording of point 2.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>6</b> Houses in multiple occupation (HMO)	0	+	-/I	-/I	+	0	-	++	-/I	-/I	-	-	+	+	+/I	+	I	I	-	Similar to Further Options Policy 5. Removal of the mention of wheelchair access as this is covered in the Core Strategy.	1-15 - No additional assessment needed following consultation on DMLP - Further Options. 16 - Affordable good quality housing promotes stable learning environments. 17 -19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>7</b> Affordable rent	I	+	-/I	-/I	-/I	-/I	-/I	-/I	I	I	-	-	+	+	+	+	-/I	-/I	I	Identical to Further Options Policy 6.	No additional assessment needed following consultation on DMLP - Further Options.
<b>8</b> Student housing	+	+	+	+	+	0	-	+	+	+	-/I	-	++	-/I	-/I	++	-/I	-/I	++	Similar to Further Options Policy 7. Addition of a requirement for 10% wheelchair accessible rooms.	1-16 - No additional assessment needed following consultation on DMLP - Further Options. 17, 18 - Conflicts may arise from policy implementation. Seeks to promote social inclusion although problems may arise from noise and anti-social behaviour associated with students. Added wheelchair accessibility contributes to social inclusion. 19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>9</b> Mixed use employment locations	++	++	-	-	+/-	+/-	+/-	+/-	+/-	-	-	-	+	+	+	+	+	+	+	Similar to Further Options Policy 8. Addition of reference to low cost accommodation suitable for starter businesses in Criteria 1.	1, 2 - Long term positive effect on through the promotion of starter businesses. 3-19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>10</b> Local Employment Locations (LEL)	++	++	-	-	0	0	-	-	-	-	-	-	+/-	+	+	+	+	+	+	Similar to Further Options Policy 9. Addition of reference to low cost accommodation suitable for starter businesses in Criteria 1.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>11</b> Other employment locations	++	++	-	-	0	0	+	+	+	+	+	-	0	+	+	++	++	+	+	Similar to Further Options Policy 10. Addition of references to low cost accommodation in criteria 9 and a reference to no net loss of jobs in criteria 2.	1-15 - No additional assessment needed following consultation on DMLP - Further Options.  16 - Policy should be positive to reducing inequalities and promoting social cohesion by preventing net loss of jobs and improving local employment opportunities and training.  17-19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>12</b> Hotels	++	+	-	-	0	0	+	+	+	+	+	+	0	0	0	+/l	0	0	0	New Policy	1, 2 - Promotes applications for new enterprise within Lewisham.  3, 4 - These use types generally require high levels of resource use and produce greater volumes of waste. Likely long term adverse impacts if recycling and energy management are not incorporated into developments.  5, 6 - No impact identified  7, 8 - The policy recommends development in areas with good access to public transport. Reduction in car journeys beneficial to local air quality and noise emission.  9 - 10 - Development to demonstrate adaptability and sustainability; addressing the impact of climate change.  11, 12 - The policy requests these developments to be sympathetic to surroundings and heritage and enhances the image of the area.  13-15 - No impact identified.  16 – Large establishments may provide training opportunities.  17-19 - No impact identified.
<b>13</b> Location of main town centre uses	++	++	-	-	-/l	-/l	-	+	+/-	l	l	-/l	0	+	+	0	0	0	+	Identical to Further Options Policy 12.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>14</b> District centres shopping frontages	++	++	-	-	0	0	-	-	0	0	0	+	+/-	-	+	+	+	+	+	Similar to Further Options Policy 13. Addition of reference to ground level residential uses within the primary or secondary shopping frontage.	1, 2 – Will encourage long term economic growth and enterprise.  3-19 – No additional assessment needed following consultation on DMLP - Further Options.
<b>15</b> Neighbourhood Local Centres	+	+	-	-	0	0	+/-	+	+	0	+	+	0	+	+	0	0	0	+	Similar to Further Options Policy 14. Addition of reference to appearance of residential properties.	1-10 - No additional assessment needed following consultation on DMLP - Further Options.  11, 12 - Promotes a high standard of design and attractive window displays. Also promotes the protection of surrounding buildings and amenity and ensure that residential frontage relates to the existing streetscape.  13-19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>16</b> Local shopping parades and corner shops	+/-	+	-	-	0	0	0	+	+	0	+	+	-	+	+	0	0	0	+	Similar to Further Options Policy 15. Addition of reference to appearance of residential properties.	1-10 - No additional assessment needed following consultation on DMLP - Further Options.  11, 12 - Promotes a high standard of design and attractive window displays. Also promotes the protection of surrounding buildings and amenity and ensure that residential frontage relates to the existing streetscape.  13-19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>17</b> Restaurants and cafes (A3 uses) and drinking establishments (A4 uses)	++	+	-	-	0	0	-/l	0	-	0	l	l	0	l	l	0	-	0	0	Similar to Further Options Policy 16. Opening hours criteria modified to be less prescriptive.	No additional assessment needed following consultation on DMLP - Further Options.
<b>18</b> Hot food take-away shops (A5 uses)	-	-	+/l	l	0	0	+	+/l	-	0	0	-	-	0	++	+	0	+	-/l	Similar to Further Options Policy 17. Opening hours' criteria modified to be less prescriptive.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
19 Shopfronts, signs and hoardings	+	+	-	-	0	0	-	0	-	0	++	+	0	+	0	0	0	0	0	Similar to Further Options Policy 18. Modification to criteria 2 to restrict hoardings further and state that consent will not be granted.	No additional assessment needed following consultation on DMLP - Further Options.
20 Public houses	-	-	+/l	+/l	0	0	0	0	-	0	0	+	+	-	0	+	0	0	+	Identical to Further Options Policy 19.	No additional assessment needed following consultation on DMLP - Further Options.
21 Cabs and taxis	+/-	+/-	0	0	0	0	-	-	-	0	0	+	0	0	+/l	+/l	0	+	+/l	Identical to Further Options Policy 20.	No additional assessment needed following consultation on DMLP - Further Options.
22 Sustainable design and construction	+/-	+/-	+	+	0	+	+	0	+	+	l	-/l	++	+	+	0	0	0	0	Similar to Further Options Policy 21. Point 2 changes from "require" to "encourage". Point 5 has been reworded for clarity and a reference to emerging 'Allowable Solutions' has been added.	1-8 - No additional assessment needed following consultation on DMLP - Further Options. 9 - Sustainable design and technologies may help to adapt to and mitigate for climate change and reduce flooding. 10-19 - No additional assessment needed following consultation on DMLP - Further Options.
23 Air quality	+/-	+/-	0	+/-	0	+	++	0	+	0	+	+	0	+	0	0	0	0	0	Identical to Further Options Policy 22.	No additional assessment needed following consultation on DMLP - Further Options.
24 Biodiversity, living roofs and artificial playing pitches	+/-	0	0	0	++	++	+	0	+	+	+	0	0	+	+	+	0	+	+	Similar to Further Options Policy 23. Name changed from "Open space and biodiversity".	No additional assessment needed following consultation on DMLP - Further Options.
25 Landscaping and trees	+/-	0	0	+	+	+	+	0	+	+	+	0	+	+	0	0	0	0	0	Similar to Further Options Policy 24. Slight rewording of Criteria 1.c.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
26 Noise and vibration	+/-	+/-	0	0	+	+	++	0	0	0	+	+	+	+	+	0	0	0	0	Similar to Further Options Policy 25. Minor deletion of Criteria 2 about tranquil open spaces policy.	No additional assessment needed following consultation on DMLP - Further Options.
27 Lighting	+/-	0	0	-	+	++	0	0	0	0	+	0	0	+	+	0	++	0	0	Identical to Further Options Policy 26.	No additional assessment needed following consultation on DMLP - Further Options.
28 Contaminated land	--	--	+	+	+	+	+	0	+	+	+	0	+	+	+	0	0	0	0	Minor rewording of Further Options Policy 27.	No additional assessment needed following consultation on DMLP - Further Options.
29 Car parking	+/-	0	0	+	0	0	++	++	+	0	+	0	0	+	+	0	0	0	+	Minor rewording of Further Options Policy 28.	No additional assessment needed following consultation on DMLP - Further Options.
30 Urban design and local character	+/-	+/-	-	-	+	++	+	++	++	++	++	++	0	++	++	0	++	++	++	Minor rewording of Further Options Policy 29.	No additional assessment needed following consultation on DMLP - Further Options.
31 Alterations and extensions to existing buildings including residential extensions	-	0	0	-	0	0	-	0	0	-	++	++	0	0	0	0	0	0	0	Similar to Further Options Policy 30. Addition to Criteria 2.b in relation to rooflights on front roof slopes.	No additional assessment needed following consultation on DMLP - Further Options.
32 Housing design, layout and space standards	+/-	0	0	0	+	0	+/-	++	+	0	++	+	++	+	+	0	++	+	++	Similar to Further Options Policy 31. Addition of reference to adequate privacy in Criteria 4.c and strengthening presumption against single aspect dwellings.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>33</b> Development on Infill Sites, Backland Sites, Back Gardens and Amenity Areas	+	0	0	0	+	+	0	0	+	+	++	+	0	0	0	0	0	0	+	Similar to Further Options Policy 32. Addition of reference to back gardens in other urban typologies.	No additional assessment needed following consultation on DMLP - Further Options.
<b>34</b> Thames Policy Area and Deptford Creekside	+	+	-	-	++	++	-	+	++	++	++	++	0	+	+	0	+	+	++	Minor rewording of Further Options Policy 33.	No additional assessment needed following consultation on DMLP - Further Options.
<b>35</b> Public realm	+	0	0	-	+	+	0	+	-	0	++	++	0	0	0	0	0	0	+	Similar to Further Options Policy 34. Addition of reference to local and historic connections that are valued and contribute to the distinctiveness of the area's public realm and streetscape and addition of reference to conservation and enhancement of historic fabric, features and assets.	No additional assessment needed following consultation on DMLP - Further Options.
<b>36</b> New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens	+/-	0	+	-	0	+	0	0	I	I	++	++	0	+/-	+/-	0	0	0	0	Minor rewording of Further Options Policy 35 in response to English Heritage comments.	No additional assessment needed following consultation on DMLP - Further Options.

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<p><b>37</b></p> <p>Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest</p>	+/-	0	0	-	0	+	0	0	I	I	++	++	0	+/-	+/-	0	0	0	0	<p>Minor rewording of Further Options Policy 36 in response to English Heritage comments.</p>	<p>No additional assessment needed following consultation on DMLP - Further Options.</p>
<p><b>38</b></p> <p>Demolition or substantial harm to designated and non-designated heritage assets</p>	-	0	0	+/I	+/I	0	0	-/I	0	0	0	-	+/-	0	0	0	0	0	0	<p>Rewording of Further Options Policy 37 emphasising the special circumstances requiring the demolition of designated heritage assets to be more consistent with the NPPF.</p>	<p>1 – Restrictions for developers. 2-19 - No additional assessment needed following consultation on DMLP - Further Options.</p>
<p><b>39</b></p> <p>Domestic satellite dishes and telecommunications equipment</p>	0	0	-	-	+	0	0	0	0	0	0	++	++	+	0	0	0	0	0	<p>Similar to Further Options Policy 38. Deletion of two subsidiary Criteria from Criteria 3 in response to comments from Mobile Operators Association to do with ensuring that the site had enough room to accommodate additional equipment and requirements for not interfering with various telecommunication operations.</p>	<p>No additional assessment needed following consultation on DMLP - Further Options.</p>

Policies	Sustainability Objectives																			Appraisal	
	Economic		Environmental										Social							Summary of policy change following consultation on DMLP - Further Options (2012/2013)	Comments
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19		
<b>40</b> Public conveniences	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+/l	+/l	Similar to Further Options Policy 39. Removal of reference to baby changing facilities.	No additional assessment needed following consultation on DMLP - Further Options.
<b>41</b> Innovative community facility provision	0	0	-	-	0	0	-	+/-	-	-	0	0	0	++	++	0	+	++	++	Identical to Further Options Policy 40.	No additional assessment needed following consultation on DMLP - Further Options.
<b>42</b> Nurseries and childcare	-	-	-	-	0	0	+	+	-	-	-	-	0	+	?	+	+	+	++	Similar to Further Options Policy 41. Addition of reference to the need for suitable space for outside play areas.	1-13 - No additional assessment needed following consultation on DMLP - Further Options. 14 – Encourages access to outdoor activities from an early age. 15-19 - No additional assessment needed following consultation on DMLP - Further Options.
<b>43</b> Art, culture and entertainment facilities	++	++	-	-	0	0	+	+	-	-	-	-	0	0	+	+	++	++	++	Minor rewording of Further Options Policy 42.	No additional assessment needed following consultation on DMLP - Further Options.
<b>44</b> Places of worship	+	+	-	-	0	0	+	+/-	+	+	+	+	0	++	++	0	0	++	++	Rewording of Further Options Policy 43. Criteria 2.b has been amended for clarity. Criteria 4 has been deleted.	No additional assessment needed following consultation on DMLP - Further Options.

The sections below summarise the appraisal of those policies created or amended following consultation at Further Options stage.

#### 5.2.5 New Policies Appraisal Summary

##### 5.2.5.1 Policy 3 - Conversion of a single dwelling to two or more dwellings

1. *The Council will refuse planning permission for the conversion of a single dwelling into flats except where environmental conditions mean that the house is not suitable for family accommodation due to any factors listed below:*

- a Location directly on the A Road network*
- b Adjacent to noise generating or other environmentally unfriendly uses*
- c Lack of external amenity space suitable for family use*

2. *Any house considered suitable for conversion according to Clause 1 of this policy will need to have a net internal floorspace greater than 130 sq. m.*

3. *All conversions must meet the general design requirements and housing standards in DM Policy 25 (Landscaping and trees), DM Policy 29 (Car parking), DM Policy 30 (Urban design and local character), DM Policy 31 (Alterations and extensions to existing buildings including residential extensions) and DM Policy 32 (Housing design, layout and space standards).*

**Beneficial Impacts:** Population, Human health, Material assets

The aim of this policy is to appropriately manage the future subdivision of family dwellings into self contained flats. This will have positive effects on the population and human health through the promotion of sufficient housing of appropriate mix which will promote social inclusion and address inequalities through the opportunity to live in a decent home.

**Adverse Impacts:** Material assets

There may be minor negative effects on natural resources and waste generation through increased construction of new developments; however these are recognised as being temporary through construction only.

##### 5.2.5.2 Policy 4 - Conversions of office space and other B Use Class space into flats

*The Council will support the conversion of office space and other B Use Class space into self contained flats in the following circumstances:*

- a the proposal does not conflict with other policies in relation to employment floorspace (DM Policies 9, 10, 11)*
- b the proposal meets the standards set out for residential development in DM Policy 32 (Housing design, layout and space standards)*
- c the proposal achieves a good living environment with adequate access, parking and safety standards, refuse storage and collection arrangements.*

**Beneficial Impacts:** Population, Human health, Material assets

The aim of this policy is to appropriately manage the future subdivision of commercial space into self contained flats. This will have positive effects on the population and human health through the promotion of sufficient housing of appropriate mix which will promote social inclusion and address inequalities through the opportunity to live in a decent home. It may also make use of assets that are currently under-used.

**Adverse Impacts:** Population, Human health, Material assets

With competition between different land uses within the borough likely, this policy may place extra pressure on office space through it being allowed to be converted to residential use. Therefore careful implementation in the context of the wider DMLP will be necessary. There may also be minor negative effects on natural resources and waste generation through increased construction of new developments; however these are recognised as being temporary through construction only.

**5.2.5.3 Policy 12 – Hotels**

*1. The Council will encourage the provision of hotels in appropriate locations, with a preference given to those in highly accessible sections of town centres, in close proximity to train stations or other locations where there is good public transport access.*

*2. The Council will support proposals for new hotels provided that the development:*

- a is of the highest design quality, is sympathetic to its surroundings and heritage and enhances the image of the area*
- b contains ground floor uses that will ensure active frontages and where appropriate add to the vitality of the area throughout the day and evening*
- c seeks to improve the range and quality of accommodation available within the borough*
- d meets the highest standards of accessibility and inclusion, and demonstrates that at least 10% of the hotel bedrooms will be wheelchair accessible*
- e provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible*
- f is able to facilitate coach and/or taxi drop off and collection, either on or off site, in a manner that respects the surrounding character and is without detriment to the safety of other vehicle users, pedestrians and cyclists*

*g maximises pedestrian linkages and demonstrates opportunities for walking, cycling and sustainable travel*

*h demonstrates that it plans for long term adaptability and sustainability.*

*3. The Council will consider the conversion of other use classes (except C3 Residential) into hotels provided that the existing buildings can be suitably converted to accommodate hotel rooms and a range of ancillary hotel facilities and it does not conflict with other policies in the plan.*

**Beneficial Impacts:** Population.

The policy encourages the development of essential tourism / short stay infrastructure in those areas of the borough best served by public transport. This will benefit both local cultural tourism and business development growth. The policy will ensure that new hotels in the borough are developed to the highest design quality so as to enhance the image of the area. Large establishments may also provide some on-the-job-training and apprenticeship opportunities.

**Adverse Impacts:** Material assets, Waste

Although conditions set out in the policy are aimed at reducing the impact of these businesses on the environment, especially through design, given their very nature, it is possible that some adverse impacts will arise. Hotels are high resource users and waste producers and their provision is therefore likely to have adverse effects in this regard.

#### *5.2.6 Amended Policies Appraisal Summary*

##### **5.2.6.1 Policy 6 - Houses in multiple occupation (HMO)**

**Beneficial Impacts:** Population, human health.

The policy promotes affordable, good quality housing for young people and those on low incomes. This will have positive effects on equality and health and well-being. It promotes housing which makes provision wheelchair accessibility, the provision of which is likely to have long term positive effects on social cohesion and public health and well-being.

There may also be positive effects for social enterprise and employment in providing a stable home for the young and those on lower incomes as this may in turn facilitate greater employment and stability for new enterprise.

**Adverse Impacts:** Population, biodiversity, water, air, climatic factors, material, material assets, cultural heritage, landscape, waste.

The policy does not make explicit reference to sustainable design principles and the provision of HMOs may therefore have adverse effects on the environment if not implemented in a sustainable manner, or in accordance with other relevant policies.

The development of new HMOs may also alter the townscape and have adverse effects for cultural and heritage assets. Sensible implementation is important to ensure that HMOs do not adversely impact the surrounding amenity of a neighbourhood and are placed in areas with access to public transport and community facilities.

#### **5.2.6.2 Policy 8 – Student Housing**

**Beneficial Impacts:** Population, human health, water, climatic factors, waste, biodiversity.

The policy seeks to provide sustainable, high quality housing for students without adversely impacting Lewisham's other residents and businesses. It promotes environmentally sustainable and affordable student housing, the provision of which is likely to have long term positive effects for students and encourage education and skills development.

The promotion of sustainable design is also likely to result in long term positive effects to climate change and flood risk adaptation and provide opportunities for biodiversity enhancements. The policy considers access to education facilities which may minimise long term congestion and air quality impacts by reducing the need to travel.

**Adverse Impacts:** Population, human health, cultural heritage, landscape,

Land-use competition is likely to arise between the need for student housing and requirement for commercial premises. There is an element of nuisance / social disturbance that may be associated with students and the night time economy. The implementation process will need to ensure that residential amenity is protected and adverse effects on neighbours avoided, as well as the well-being of the community as a whole. Temporary adverse effects on air and noise quality during the construction phases were also identified as possible adverse impacts.

#### **5.2.6.3 Policy 9 – Mixed use employment locations**

**Beneficial Impacts:** Population, Human health, Material assets

This policy seeks to protect employment land and promote mixed-use and local business – including starter businesses – within Lewisham. It also aims to encourage new buildings capable of attracting and accommodating a wide variety of new and established businesses on sites in industrial use. Through the improvements, there are positive effects on the population through encouraging sustained economic growth and promoting employment and enterprise in Lewisham. Promoting a range of mixed-use opportunities will likely have a positive impact on the local economy in Lewisham. This may also have indirect positive impacts through making the borough an attractive place to live and work through improving the amenity and enhancing opportunities for residents.

**Adverse Impacts:** Population, Material assets

This policy applies restrictions on developers that may have an indirect (and temporary) negative effect on economic growth in the borough. However this will be off-set by the potential beneficial impacts through ensuring mixed use development in Lewisham is managed.

**5.2.6.4 Policy 11 – Other employment locations**

**Beneficial Impacts:** Population, Human Health, Material Assets, Air

This policy seeks to protect employment land and promote mixed-use and local business development within Lewisham. It seeks to promote sustainable development in employment locations in the borough. Ensuring that employment related development forms part of mixed use opportunities, employment generation in the local community and environmental impacts will likely produce a substantially beneficial outcome for Lewisham. It may contribute to sustained economic growth, promote employment and new enterprises, promote social inclusion and ensure equitable outcomes for the community.

Additionally, by specifically addressing sustainable environmental outcomes and transport accessibility, the pollution impacts of vehicle transportation, air quality and natural resource use are addressed for the borough.

Seeking contributions for education/training may also have benefits for improved education, training and skills for the population in Lewisham.

**Adverse Impacts:** Population, Material Assets, Climatic factors, Air

Enhancement, regeneration and new development of existing buildings will require resources for construction and operation of the buildings. Materials will need to be sourced and transported to the site and construction waste will be produced in the process. These adverse impacts will however be short term. Implementation of appropriate sustainability measures will need to be undertaken to ensure that growth in employment locations will not have adverse local impacts on resource use, climate change contribution and waste generation as this may have an adverse impact on the health and wellbeing of the local population.

**5.2.6.5 Policy 14 – District centres shopping frontages**

**Beneficial Impacts:** Population, Human Health, Cultural Heritage, Material Assets,

This policy promotes the location and preservation of retail and other commercial activities in district centres, and places conditions on any proposed change of use to maintain or enhance the townscape. The policy is likely to promote long term economic growth within district centres and may encourage and promote employment and enterprises in Lewisham. It will also ensure that there are convenient and accessible shops and services for the local communities in the Borough, potentially reducing reliance on the car. Through the consideration of the impacts on crime and anti-social behaviour and the amenity of the area, benefits to

the local population and human health may be realised with improved community safety, conservation of heritage assets and promote social inclusion.

**Adverse Impacts:** Population, Human Health, Climate Change

Through the focus on retail and other commercial spaces over residential development, this policy may have adverse impacts on the creation of sufficient housing options in Lewisham. However when considered in the context of all other policy options, this policy in itself is considered to go sufficiently far to protect the amenity and character of district centres. Some minor negative impacts on climatic factors are potentially presented by this policy through the requirement for residents to travel to district centres to visit the retail stores.

#### **5.2.6.6 Policy 15 – Neighbourhood Local Centres**

**Beneficial Impacts:** Population, Human health, Climate change.

The policy supports retention of high quality Class A1 shops within neighbourhoods and local centres, and is likely to promote long term economic growth in Lewisham. The policy also ensures that any loss of A1 shops will not affect the amenity of neighbourhoods or reduce accessibility to the essential services they provide. The policy is therefore likely to have a long term positive effect on community wellbeing and reduce deprivation and lack of access to services. Retention of A1 shops within neighbourhoods is likely to reduce the need for local residents to travel and may therefore have a long term indirect positive effect on climate change adaptation. Encouraging the protection of surrounding buildings and amenity will ensure that residential frontages relate to the existing streetscape.

**Adverse Impacts:** Waste, Human health.

Future developments which conform to this policy are likely to produce construction waste and associated noise and vibration. This is likely to have short term adverse impacts on waste production and human health.

#### **5.2.6.7 Policy 16 – Local shopping parades and corner shops**

**Beneficial Impacts:** Population, human health, material assets, climatic factors.

The policy will result in positive socio-economic effects as it promotes local business and accessibility to services for local communities. The policy also protects the character and amenity of town centres and will have the indirect benefit of promoting climate change adaptation, as A1 shops are located within walking distance of local residents. Encouraging the protection of surrounding buildings and amenity will ensure that residential frontages relate to the existing streetscape.

**Adverse Impacts:** Population, Human health, Waste.

Future developments which conform to the policy are likely to produce construction waste and associated noise and vibration. This is likely to have short term adverse

impacts on waste production and human health. There is the potential for land-use conflict with other businesses and housing.

**5.2.6.8 Policy 22 – Sustainable design and construction**

**Beneficial Impacts:** Population, Human health, Waste, Water, Air, Climatic factors, Material assets, Biodiversity, Natural resources.

The policy promotes the incorporation of sustainable design into conversions, refurbishments and change of use developments within Lewisham. Implementation of the policy is likely to have long term positive effects for the environment, with sustainable design and the adoption of BREEAM standards in construction promoting (both directly and indirectly) energy efficiency, waste reduction, climate change and flood risk adaptation, and biodiversity enhancement. Environmental improvements are likely to have indirect positive effects for human health and social cohesion within the community, which are likely to lead to potential economic benefits in the long term as Lewisham becomes a more desirable place to live and work.

**Adverse Impacts:** Population, Cultural heritage.

The policy imposes certain restrictions/conditions on developers, and this may have short term adverse effects on development and economic growth. Incorporation of sustainable design principles into historical assets may be difficult, and conflicts may therefore arise.

**5.2.6.9 Policy 24 – Landscaping and Trees**

**Beneficial Impacts:** Population, Human health, Biodiversity, Soil, Water, Air, Climatic factors, Landscape.

The policy promotes retention of trees, tree planting and enhancement of the Lewisham landscape. This is likely to have long term positive effects for the environment, and make Lewisham a more desirable place to live. This is likely to have indirect long-term positive effects on human health and well-being. Additionally, there is an indirect minor positive effect on climate change adaptation through the positive environmental impact that increased vegetation may have on air quality.

**Adverse Impacts:** Population

The policy presents restrictions and conditions for developers, and therefore may increase the cost of development leading to adverse effects on the local economic growth. There may be issues associated with tree planting due to the cable and pipe lines that lie under the street surfaces.

**5.2.6.10 Policy 38 – Demolition or substantial harm to designated and non-designated heritage assets**

**Beneficial Impacts:** Population, Human health

This policy aims to provide criteria that developers would need to satisfy in order for the demolition or substantial harm to heritage assets to be considered. This provides protection to these assets in all but circumstances where it can be demonstrated their retention is no longer viable. The requirement for replacement development will provide beneficial impacts to the community through the provision of sustainable places which may be difficult when considering the retrofit of existing infrastructure.

Protection and retention of old building stock may also reduce the amount of building waste produced and could have indirect benefits for biodiversity as bats often favour older buildings as roost sites.

**Adverse Impacts:** Material assets, Population, Air, Cultural Heritage

Adverse impacts may be realised by the community through the loss of heritage assets within Lewisham and the subsequent material use and construction impacts associated with new development (including air, water and waste).

#### 5.2.6.11 Policy 41 – Nurseries and Childcare

**Beneficial Impacts:** Population, Human health

The policy seeks to provide day nurseries and facilities for the care, recreation and education of children. This will lead to a positive impact on improving access to skills and training for both children and parents.

Community safety is a key aspect to this policy which will be beneficial to reducing health inequalities and ensuring that no negative impacts on the community in the long term occur.

**Adverse Impacts:** Population, Water, Air, Material assets, Landscape, Waste.

Land-use competition is likely with other premises such as commercial businesses. All new development will result in use of natural resources and the production of waste during both the construction and operational phases. Temporary adverse effects on air and noise quality during the construction phases were also identified. Long term impacts on the historic environment may occur and loss of permeable surfaces may have a negative impact on flood risk.

The proposed mitigation measures are summarised in Section 5.3 (Table 5-6).

## 5.3 Equalities Analysis Assessment

### 5.3.1 Introduction

An Equalities Analysis Assessment (EqAA) has been prepared as part of the DMLP following consultation on the further options document. An EqAA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of a policy for different groups in the community. Local authorities have a duty under race, disability and gender legislation to carry out an EqAA of their Local Plans. The assessment seeks

to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EqAA highlights key issues needing further consideration and its recommendations have been used in the preparation of the policies.

#### 5.3.2 *Monitoring*

The Council understands the importance of monitoring the implementation of plans and developments to ensure that the findings of the EqAA are put in place. Therefore, relevant measures have been included in the DMLP monitoring framework.

Monitoring arrangements in the Lewisham Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the DMLP once they are adopted, and how they impact on equalities issues. Monitoring will be undertaken by the Planning Management Team, Resources & Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet.

## 5.4 **The Habitat Regulations Assessment (HRA)**

### 5.4.1 *Process*

The purpose of a HRA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a Natura 2000 site (also known as a European Site) and to ascertain whether that plan would adversely affect the integrity of such a site.

Guidance from the Department of Communities and Local Government (DCLG) on Habitat Regulation Assessment summarises the HRA process prescribed in Article 6(3) and (4) of the Habitats Directive into three main stages:

- Task 1 Assess likely significant effects.
- Task 2 Appropriate Assessment and ascertaining the effect on site integrity.
- Task 3 Mitigation and alternative solutions.

Task 1 of the process is to identify whether the plan policy is 'likely to have a significant effect' on a European site, referred to as 'Screening'. If the Screening process identifies the potential for significant adverse impacts on Natura 2000 sites, tasks two and three of the HRA need to be completed.

In accordance with the Habitat Regulations a HRA is required when, in view of a European site's objectives, a land use plan:

- is likely to have a significant effect on a European site (Natura 2000 site) in Great Britain (either alone or in combination with other plans and/or projects); and

- is not directly connected with or necessary to the management of the site.

#### 5.4.2 Outcome

A Habitats Regulations Assessment screening report accompanies the Proposed Submission Version of the DMLP. In compliance with the Habitats Directive (92/43/EEC) and the Regulations, it assesses the likely significant effects of the policies. This approach has been supported by Natural England and was adopted for other DPDs in Lewisham.

There are no designated European sites within the LBL. Through consultation with Natural England, the European sites assessed are those located within a 15 kilometre radius of the borough boundary as they are considered to be in close enough proximity to potentially be impacted. The report identifies Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation and the Lee Valley Special Protection Area (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors are presented. The report provides details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a policy set out in the proposed submission DMLP, could have on the European sites. This includes in combination and cumulative effects.

## 5.5 Cumulative and long term effects

Many environmental problems result from the accumulation of multiple small and often indirect effects, rather than a few large and obvious ones. Examples include loss of tranquillity, changes in the landscape, loss of open space, and climate change impacts.

Cumulative effects can arise where several developments each have effects but combined together have a significant effect, or where several individual effects of a plan (e.g. noise, dust and visual) have a combined effect.

Cumulative effects have been considered throughout the SA and development of the DMLP. The cumulative effects of other plans and programmes were considered within Stage A of the SA process.

Core Strategies set out the key elements of a Local Authority's planning vision and strategy and form the central part of the Local Development Framework (LDF). All other LDF documents must be consistent with the Core Strategy. Therefore all policies within the DMLP must be consistent with those in the Core Strategy.

The DMLP is directly influenced by the Lewisham Core Strategy and is in conformity with it at all times.

#### 5.5.1 Assessment of cumulative effects

Assessment of cumulative effects focuses on identifying the total impact of both direct and indirect effects of a plan on receptors. Receptors may include natural resources (e.g. air, water, soil, landscape), sections of the population (e.g. people

living in particular areas or vulnerable members of the community) or ecosystems and species.

The likely significant effects on the environment of the DMLP Policies including short, medium and long-term effects, permanent and temporary effects, and secondary, cumulative and synergistic effects were identified and discussed throughout the SA process.

There are many potential and complex interactions between the DMLP and the environment, and many of the impacts predicted are cumulative in their nature but difficult to predict with certainty.

Implementation of the DMLP may result in cumulative negative effects on air quality, landscape, soils, biodiversity, water quality and climate change, as can development pressure on land use in general.

However, without implementation of the DMLP i.e.: the “business as usual” scenario, the impacts will be far greater. For example, ‘ad hoc’ development will be more likely, resulting in further degradation of the environment that will not promote active travel, include climate change adaptation techniques, reduce traffic congestion etc.

Taking into account the results of the SA at various stages, proposed mitigation measures have been included in the DMLP in the form of policy options, or revision of initially proposed options, to ensure that negative effects are reduced.

The following summarises the predicted cumulative effects.

- *The Local Economy* – Positive long term effects for economic growth and employment are expected, with the retention and protection of employment land and the promotion of retail and business within the town centre. The mixed-use approach adopted by the policy options makes provision for housing, business and open spaces which meet high design standards and contribute to making Lewisham a desirable place to live and work. The effect of these measures is likely to improve the general appeal of Lewisham (and in particular the town centres) for both the public and potential investors, thereby contributing to growing the local economy. The DMLP is therefore expected to have a broadly positive effect on the Lewisham economy and employment for local residents.
- *The Environment* - Broadly positive effects for the environment with improvements to air quality, reductions in noise and vibration, and enhancement of biodiversity and open spaces, expected. These policy options also contribute to mitigation for many of the adverse environmental impacts associated with development and economic growth. Furthermore, the recognition of the importance of sustainable design (including BREEAM and Code for Sustainable Homes standards) and promotion of measures to reduce car-use and congestion are also likely to reduce resource use and

contribute to climate change adaptation and mitigation. The cumulative impact of multiple development projects occurring simultaneously will need to be considered at implementation/construction. These could exacerbate short term impacts relating to noise/vibration and air quality; however they can be mitigated through careful phasing of projects and considerate construction practices.

- *Society* – Likely to contribute to long term positive effects on the social fabric of the borough. Various policy options make provision for new high quality housing in a central and easily accessible location, new community facilities, improved public realm and social infrastructure, and a thriving economy and jobs market. These measures, if implemented in conjunction with associated policies designed to reduce adverse effects on the local community (including measures to reduce crime/the fear of crime, sensitive placement of residential housing in relation to noise/antisocial behaviour etc.) will ensure that communities are not adversely impacted by proposed development within Lewisham.

## 5.6 Proposed Mitigation Measures

Mitigation is one of the key outputs of the SEA and SA process.

Mitigation measures may themselves have adverse environmental effects which should be recognised. In identifying the need for mitigation and developing specific mitigation measures, attention has been given to the “mitigation hierarchy” set out in Table 5-5. The initial focus of the mitigation hierarchy is avoidance of adverse effects wherever possible.

Table 5-5 Mitigation Approach

Mitigation Approach	Comment
Avoidance or prevention	This involves modifying alternative options and policies for the DPD.
Reduction	At the level of SEA/SA, mitigation could focus on timing or phasing to reduce adverse effects.
Offsetting or compensation	This approach is used where opportunities are not available to either avoid or reduce adverse effects.
Remediation	Remediation is used where an adverse effect is unavoidable but the long term effects can be reduced by restoring the affected area to its original state.
Enhancement	Although not strictly a measure to mitigate an adverse effect, enhancement is an opportunity to improve social, environmental and economic conditions. Enhancement could be used successfully to improve conditions.
Further information	Although the overall effects of the preferred options have been assessed through the SA there may be a degree of uncertainty as to the anticipated effects of specific project measures on the ground. In such circumstances mitigation could include specification of the need to conduct further assessments at the measure / scheme level e.g. Environmental Impact Assessment (EIA), Health Impact Assessment (HIA).

Table 5-6 Mitigation and where addressed within the DMLP

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Economic			
Eco 1	To encourage sustained economic growth across a variety of sectors	<p>Ensure employment policies are in place to prevent loss of employment land and reduce conflict with other land-uses.</p> <p>Encourage independent mixed local business.</p> <p>Improved public realm.</p>	<p>DM Policy 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham.</p> <p>Employment Land DM Policies 9 – 11 seek to protect employment land and promote mixed-use and local business development within Lewisham. Town Centres and Retail Policies including DM Policies 12, 13, 14, 15, 18 and 19 promote protection and enhancement of town centres' vitality and viability, retention sensible location of local businesses, and protection of the local character and shop frontages. Furthermore, multiple Policies falling under Promoting Good Design (DM Policies 30 to 40) and Climate Change and Environmental Management (DM Policies 22, 23, 24, 26 and 29) seek to protect and enhance the public realm and general liveability of Lewisham, encouraging people to live and work within the borough.</p>
Eco 2	To encourage and promote employment and new enterprise in Lewisham	<p>Ensure employment policies are in place to prevent loss of employment land and reduce conflict with other land-uses.</p> <p>Encourage independent mixed local business.</p> <p>Improved public realm.</p>	<p>DM Policy 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham.</p> <p>Employment Land DM Policies 9 – 11 seek to protect employment land and promote mixed-use and local business development within Lewisham. Town Centres and Retail Policies including DM Policies 12, 13, 14, 15, 18 and 19 promote protection and enhancement of town centres' vitality and viability, retention sensible location of local businesses, and protection of the local character and shop frontages. Furthermore, multiple Policies falling under Promoting Good Design (DM Policies 30 to 40) and Climate Change and Environmental Management (DM Policies 22 - 28) seek to protect and enhance the public realm and general liveability of Lewisham, encouraging people to live and work within the borough.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Environmental			
Env 3	To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates.	<p>Ensure all new developments achieve BREEAM excellent accreditation.</p> <p>Promote the reuse and recycling of waste from all streams.</p> <p>Promote the use of site waste management plans.</p> <p>Ensure new developments incorporate appropriate waste storage facilities into design.</p>	<p>DM Policies 15, 17 and 18 place conditions on new shop and restaurant/café/drinking establishments to not adversely affect the local amenity, with specific emphasis placed on waste management.</p> <p>The Core Strategy Policy 9 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Policy 22 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. BREEAM sets requirements for waste management and Core Strategy policy 14 deals with waste management locally.</p>
Env 4	To use and manage the consumption of natural resources in a sustainable manner	<p>Ensure all new developments, as well as conversions, extensions, and refurbishments achieve BREEAM excellent accreditation.</p> <p>Promote the reuse and recycling of waste from all streams.</p> <p>Promote the use of locally sourced sustainable materials.</p> <p>Promote energy efficiency designs in developments for example, solar, wind, passive solar.</p> <p>Promote water efficiency designs in developments for</p>	<p>The Core Strategy Policy 9 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Policy 22 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. DM Policy 22 also promotes the incorporation of passive design measures to manage heating and cooling of buildings – both contributing to energy efficiency.</p> <p>DM Policy 24 which encourages the use of green roofs in design will contribute to improving energy efficiency and reducing resource use.</p> <p>London Plan Policy 5.3(C)(h) – Sustainable Design and Construction. “Securing sustainable procurement of materials using local supplies where feasible” will also guide development in Lewisham.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
		example, rain water harvesting, grey water recycling.	
Env 5	To protect and enhance the borough's open spaces	Promote enhancements of biodiversity through green roofs, green walls, creation of open space, roof gardens, planting of street trees, and provision of bat and bird boxes etc.	<p>DM Policy 24 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The policy also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Policy 25 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity.</p> <p>DM Policy 36 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p>
Env 6	To protect and enhance the borough's natural habitat, biodiversity, flora and fauna, and increase opportunities for people to access nature.	<p>Promote enhancements of biodiversity through green roofs, green walls, creation of open space, roof gardens, planting of street trees, and provision of bat and bird boxes etc.</p> <p>Ensure adverse effects arising from disturbance (noise, vibration and light) and poor air quality are addressed.</p> <p>Promote use of native, locally appropriate species in plantings.</p>	<p>DM Policy 24 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The policy also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Policy 25 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity.</p> <p>DM Policy 36 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>DM Policies 23, 26 and 27 seek to reduce the impact of poor air quality, noise, vibration and lighting on biodiversity assets including designated sites and species.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 7	To improve air quality and reduce noise and vibration	<p>Reduce traffic congestion and car use.</p> <p>Promote Considerate Construction Schemes phased construction to reduce the noise, vibration and air quality impacts associated with construction.</p> <p>Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.</p> <p>Noise complaints should be monitored.</p> <p>Considerate constructors' schemes should be promoted through policy for all new developments.</p>	<p>DM Policies 23 seeks to reduce the impact of new development on air quality within Lewisham; only permitting development within AQMAs which will not adversely affect air quality. DM Policy 23 also implements restrictions on biomass boilers, Biomass boilers have implications on air quality, however on site renewable energy generation is a key requirement in Core Strategy Policy 9 which will provide further mitigation.</p> <p>DM Policy 29 (along with Policies 13, 14, 15) promotes car limited development which is likely to reduce vehicle congestion and improve air quality.</p> <p>DM Policy 26 seeks to minimise the potential or actual noise pollution and vibration resulting from development by placing conditions on new development.</p> <p>DM Policy 17, dealing specifically with provision of restaurants, cafes, and bars, also places conditions on where these developments will be permitted, in order to reduce noise disturbance. Similarly, DM Policy 18 dealing with the provision of hot food take-away shops also addresses noise associated with this type of development.</p> <p>Retail and town centre development (including DM Policies 13, 14, 15 and 16) through their management of over concentration of specific uses, also indirectly address noise and vibration generation.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 8	To reduce car travel and improve accessibility by sustainable modes of transport	<p>Promote car limited development.</p> <p>Promote active travel.</p> <p>Ensure safe cycle routes and cycle parking is provided.</p> <p>Provide adequate walkways and good urban design.</p>	<p>DM Policy 28 (along with Policies 13, 14, 15) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p> <p>Housing Policies including DM Policy 5 and 7 promotes the placement of student housing and sheltered housing in close proximity to public transport – a move which will reduce the need for private car use.</p> <p>Core Strategy Policy 15 provides comprehensive sustainable transport policies, which would provide further mitigation for development in Lewisham.</p>
Env 9	To mitigate and adapt to the impact of climate change	<p>Reduce private car use and congestion.</p> <p>Promote the use of locally sourced sustainable materials.</p> <p>Promote energy efficiency designs in developments for example, solar, wind, passive solar, green roofs, green walls, creation of open space, roof gardens, planting of street trees.</p>	<p>DM Policy 29 (along with Policies 13, 14, 15) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p> <p>Housing Policies including DM Policy 5 and 7 promotes the placement of student housing and sheltered housing in close proximity to public transport – a move which will reduce the need for private car use.</p> <p>DM Policy 24 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The policy also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Policy 25 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity. DM Policy 35 also encourages the planting of trees and vegetation to enhance the streetscape and public realm.</p> <p>DM Policy 36 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>The Core Strategy Policy 9 currently sets standards for new residential and</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
			<p>minor and major non-residential development across the borough. In conjunction with this, DM Policy 22 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. DM Policy 22 also promotes the incorporation of passive design measures to manage heating and cooling of buildings – both contributing to energy efficiency.</p> <p>DM Policy 22, which encourages the use of green roofs in design, will contribute to improving energy efficiency and reducing resource use.</p>
Env 10	To reduce and manage flood risk	Prevent flood risk and surface run off through the implementation of SUDS, greens roofs, roof gardens, open spaces etc,	<p>DM Policy 24 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The policy also encourages the use of green roofs in design. DM Policy 25 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity.</p> <p>DM Policy 35 also encourages the planting of trees and vegetation to enhance the streetscape and public realm.</p> <p>DM Policy 36 requires proposals to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>The Core Strategy Policy 9 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Policy 22 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM Excellent rating.</p>
Env 11	To maintain and enhance landscapes and townscapes	<p>Encourage good urban design.</p> <p>Reduce the amount of derelict buildings.</p> <p>Reduce the amount of contaminated land.</p>	<p>A large proportion of the Policies within the DMLP Proposed Submission Version promote good urban design (DM Policies 30 - 40) and seek to protect the townscape from developments which may detract from its cultural and aesthetic appeal (DM Policies 12 – 21). DM Policy 28 seeks to manage contaminated land within the borough, contributing to the enhancement of Lewisham’s land and townscapes.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 12	To conserve and enhance heritage assets and use in the creation of sustainable places.	Conservation of cultural heritage assets.	A number of Policies within the DMLP address the protection and management of cultural heritage assets within Lewisham. DM Policies 36, 37 and 38 seek to protect cultural heritage assets in Conservation Areas, Listed Buildings, non-designated locally listed buildings, Registered Parks and Gardens, and archaeological assets.
<b>Social</b>			
Soc13	To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home	Provide affordable homes close to sustainable travel opportunities Ensure policies are in place to protect existing housing stock.	DM Policy 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham. DM Policies 2 – 8, promote the protection of existing housing stock, and provision of student housing, affordable housing, and sheltered housing – all with appropriate health, accessibility and design standards in mind. DM Policy 30 and 32, dealing with housing space and design, also seeks to ensure that homes are of a high quality in terms of space, access to recreational grounds, and health.

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Soc 14	To improve the health and well-being of the population and reduce inequalities in health.	Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities, including housing.	<p>Multiple Policies within the DMLP Proposed Submission Version contribute to equitable health and wellbeing within Lewisham. Housing Policies (DM Policies 2 – 8) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.</p> <p>DM Policy 18 focuses on restricting take-away shops which will reduce access to unhealthy foods and will contribute to improved health and well-being.</p> <p>Environmental Policies (DM Policies 22, 23, 24, 25, 27 and 28) all contribute to improving Lewisham’s living environment and enabling access to natural areas (which are proven to positively impact a community’s health and wellbeing).</p> <p>DM Policy 32, focused on housing design and space standards specifically mention using Lifetimes Homes and Wheelchair Housing standards, where appropriate.</p> <p>DM Policy 30, a general design and local character policy, promotes an aesthetically appealing Lewisham which will contribute to community wellbeing.</p> <p>Furthermore, DM Policies 41, 42, 43, and 44 promote access to community facilities and services such as community facilities, nurseries and childcare, and places of worship.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Soc 15	To address deprivation, promote social inclusion and ensure equitable outcomes for all communities	Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities, including housing.	<p>Housing policies (DM Policies 2 – 8) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.</p> <p>DM Policy 24 promotes access for all to Lewisham's open spaces.</p> <p>DM Policy 32, focused on housing design and space standards specifically mention using Lifetimes Homes and Wheelchair Housing standards, where appropriate.</p> <p>DM Policies 41, 42, 43, and 44 promote access to community facilities, nurseries and childcare, and places of worship.</p> <p>DM Policies 9 – 11 promote local enterprise and employment across various business types within Lewisham. This is likely to combat deprivation and promotes social inclusion.</p>
Soc 16	To provide for the improvement of education, skills and training	Ensure inclusive sustainable affordable access is provided and maintained to all to community facilities.	<p>DM Policies 41, 42, 43, and 44 promote access to community facilities, nurseries and childcare, arts and culture and places of worship – all of which provide skills transfer and training to communities.</p> <p>DM Policy 11 places a condition on developers for contributions to training and/or local employment schemes, regardless of its location, where there is loss of local employment as a result of redevelopment.</p>
Soc 17	To enhance community safety by reducing crime, anti-social behaviour and the fear of crime	<p>Ensure secured by design principles are applied to new developments and refurbishments.</p> <p>Promote good urban design.</p>	DM Policy 30 promotes housing design which is safe and secure to reduce crime and the fear of crime.

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Soc 18	To encourage a sense of community identity, social cohesion and civic participation	Ensure inclusive sustainable affordable access is provided and maintained to all community facilities.	DM Policies 41, 42, 43, and 44 promote access to community facilities, nurseries and childcare, arts and culture and places of worship – all of which help to promote social cohesion and civic participation.
Soc 19	To improve accessibility to leisure facilities, community infrastructure and key local services	Ensure inclusive sustainable affordable access is provided and maintained to all community facilities.	<p>DM Policy 24 promotes access for all to Lewisham's open spaces.</p> <p>DM Policies 41, 42, 43, and 44 promote access to community facilities, nurseries and childcare, and places of worship.</p> <p>Housing Policies (DM Policies 5, 6 and 7) promote locating housing for students, the elderly and vulnerable members of the community in areas with convenient access to community services.</p> <p>DM Policy 29 (along with Policies 13, 14, 15, and 16) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p>

## 6 Implementation Monitoring

### 6.1 Links to Other Tiers of Plans and Programmes and the Project Level

This SA has been developed taking account of the aims and objectives of related plans and programmes at the international, European, national, regional and local level. The DMLP provides a basis for development of appropriate design guidance and, in particular, a framework for project-specific applications and where required Environmental Impact Assessment (EIA).

#### 6.1.1 *Proposals for Monitoring*

DCLG guidance on SA for DPD's states that the SA Report shall include a description of the measures envisaged concerning monitoring and that proposals for monitoring must be considered early in the SA process, included in the SA Report, and reviewed in the light of any responses to consultation.

The LBL needs to ensure that monitoring information is appropriate to the needs of the DMLP, up to date and reliable, and that sources of information are referenced. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to implementation of the DMLP when they occur. However, in line with guidance, this provision may be understood as covering effects which differ from those which were predicted, or unforeseen effects which are due to changes of circumstances.

#### 6.1.2 *Monitoring Process*

The results of monitoring will be provided by the LBL as part of the process of annual reporting on the Local Plan progress. Contingency procedures will be developed to identify and address poor performance against objectives or unforeseen adverse impacts of the DMLP.

Table 6-1 sets out a proposed list of monitoring activities currently being considered. The following set of SA monitoring indicators along with the DMLP monitoring indicators set out have been selected in combination to monitor the performance of the DMLP.

By reviewing and monitoring the Plan the Council will be able to consider:

- The impact that the Plan is having in helping to achieve national, regional and local targets;
- Whether the policies are working effectively, or require adjusting; and
- Whether any wider national or regional strategy or policy changes require a change to the Plan.

Table 6-1 Monitoring

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
<b>Social</b>					
Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property Prices (£)	Borough-wide only	Land Registry	Annual
		Proportion of rented accommodation (number of renting households)	Borough-wide only	LBL	3yrs
		Number of people applying for statutory homelessness	n/a	LBL	Annual
		Number of homeless applications accepted	n/a	LBL	Annual
		Number of households in temporary accommodation	n/a	LBL	Annual
		% of affordable housing	n/a	LBL	Annual
		Increase supply of new homes	n/a	LBL	Annual
		Number and percentage of dwellings by bedroom size	n/a	LBL	Annual
		Net additional pitches (Gypsy and Traveller)	n/a	LBL	Annual
		Decent homes	To increase the provision of housing that meets decent homes standards	% of local authority houses designated as non-decent (number of dwellings)	n/a
% of new residential accommodation completed to lifetime homes standards	n/a			LBL	3yrs
Access to river	To increase recreational	Numbers of the members of the	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
	access to the Quaggy and Ravensbourne rivers	public who attend council organised river activities			
		Amount of new schemes increasing access to river	n/a	LBL	Annual
Community facilities	To increase the provision of accessible and inclusive everyday facilities	Funding secured through planning obligations for infrastructure, facilities, services and employment and training	n/a	LBL	Annual
Heritage	To protect and enhance heritage buildings	Levels of investment in retaining and maintaining list buildings	n/a	LBL	Annual
		Condition of listed building in the local area	n/a	LBL	Annual
		Number of listed buildings and scheduled monuments on the 'at risk' register	n/a	LBL	Annual
		No. of conservation areas covered by up-to date CA appraisals and management plans	n/a	LBL	Annual
		No. of planning permissions granted for buildings in protected vistas, the London Panorama, and local views and panoramas	n/a	LBL	Annual
		Number of planning applications in buffer zones of Scheduled Ancient	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		Monuments, Heritage Sites etc			
Culture	To protect and enhance cultural diversity	Numbers of the members of the public who attend council organised river activities?	n/a	LBL	Annual
		Gains and losses of community and recreational facilities completed	n/a	LBL	Annual
Crime	To reduce crime levels in the town centre	Number of offences per 1000 of population. Detailed indicators for the following: - violence against person - burglaries - robberies - violent crime - sexual offences	n/a	London Metropolitan Police	Annual
Education	To increase access to lifelong learning	Adult education provision	n/a	LBL	Annual
		% pupils receiving 5 or more GCSEs at grades A* to C equivalent	Borough wide only	LBL	Annual
		Participation of 16-18 year olds in education and training	Borough wide only	LBL	Annual
		Amount of apprentice schemes coordinated with local colleges	n/a	LBL	Annual
Social inclusion	To improve access to amenities for vulnerable members of the community.	% of population with access to services by walking / public transport (borough wide)	Borough wide only	LBL	Annual
		Number of shop mobility schemes	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population (Serious or fatal) Detailed indicators could include: - number of road accidents with people slightly injured	Borough wide only	LBL	Annual
Health	To improve inclusive access to local healthcare facilities	% respondents in 'good health'	Borough wide only	Census	10 year
		Life expectancy (years)	Borough wide only	National Health Service (NHS)	Annual
		Infant mortality rates	Borough wide only	NHS	Annual
		Mortality ratio	Borough wide only	NHS	Annual
		% of people with lifelong limiting illnesses	Borough wide only	NHS	Annual
Noise	To reduce noise from road traffic, construction and industry	Number of complaints related to noise from: Roads, Construction, Maintenance, Noisy neighbours and Other	n/a	LBL	Annual
Open space	To increase the quality and provision of publicly accessible open spaces	ha of accessible open space per 1000 population	Borough wide	LBL	2010
		Gain and Loss of open space	n/a	LBL	Annual
<b>Environmental</b>					
Effects of climate change	To reduce the risk and effects of flooding	Number of people and properties affected by fluvial flood incidents.	n/a	Environment Agency	Annual
		Length of river restored and amount of	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		restoration projects			
		Amount of planning permissions granted contrary to advice of Environment Agency	n/a	LBL	Annual
		Number of approved developments which incorporate SUDS	n/a	LBL	Annual
		Number of flood prevention schemes	n/a	LBL	Annual
Sustainable transport	To reduce dependency on private cars	Proportion of people going to work by different means i.e. private car, cycle, walk, bus, train, underground etc.	n/a	Census	10 year
		Percentage of completed non-residential development complying with car-parking standards	n/a	LBL	Annual
		Percentage of residents surveyed using different modes of transport, reasons and distance travelled.	n/a	Census	10 year
		Number of car clubs and bays in the borough	n/a	LBL	Annual
		Number of completed car free or car limited development	n/a	LBL	Annual
		Electric car charging points	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		% of permitted major developments with travel plans	n/a	LBL	Annual
		Cycle parking	n/a	LBL	Annual
Renewable energy	To increase on-site renewable energy provision	Per capita reduction in CO2 emissions	Borough wide only	LBL	Annual
		Renewable energy generation	n/a	LBL	Annual
		Provision of decentralised energy	n/a	LBL	Annual
Energy efficiency	To increase the energy efficiency performance of existing buildings	% of new developments and refurbishments accredited to BREEAM excellent or other rating	n/a	LBL	Annual
		% CO2 energy savings from new developments	n/a	LBL	Annual
		Compliance with Code for Sustainable Homes	n/a	LBL	Annual
Waste and recycling	To increase the amount of waste recycling	kg of household waste per head per year	n/a	LBL	Annual
		% household waste recycled	n/a	LBL	Annual
		Numbers of Site Waste Management Plans submitted with planning applications	n/a	LBL	Annual
Water use	To provide sustainable sources of water	Water loss through leakages	n/a	Thames Water	Annual
		% of dwellings that have a water meter	n/a	Thames Water	

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale	
Air quality	To improve air quality	Air pollution levels of Fine Particles, NitrogenOxide, Carbon Monoxide, Ozone and Benzene	n/a	LBL	Annual	
		Number of Local Air Quality Management Areas (LAQMA)	n/a	LBL	Annual	
Biodiversity	To value, protect and enhance biodiversity	Achievement of Biodiversity Action Plan Targets	n/a	LBL	Annual	
		Number of tree planting schemes	n/a	LBL	Annual	
		Number of council owned Green/open spaces with an agreed management plan in place	n/a	LBL	Annual	
		The number of parks achieving Green Flag status	n/a	LBL	Annual	
		Percentage of parks that are fully accessible	n/a	LBL	Annual	
		Number of biodiversity enhancements schemes	n/a	LBL	Annual	
		Number of completed living roofs and walls	n/a	LBL	Annual	
		Number of applications within Sites of Importance for Nature Conservation (SINC) granted or refused planning permission	n/a	LBL	Annual	TBC

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		Change in areas and populations of biodiversity importance	n/a	LBL	
<b>Economic</b>					
Retail offer	To increase the diversity of the retail offer	Retail floorspace	n/a	LBL	Annual
		% non-retail uses in primary shopping frontages	n/a	LBL	Annual
		Number of different retail functions and types accommodated in the area	n/a	LBL	Annual
Evening economy	To encourage a vibrant, well-managed evening economy	Evening Economy - available floorspace	n/a	LBL	Annual
Local business	To increase density of local business	Number of new businesses in the area	n/a	LBL	Annual
		Vacancy rates	n/a	LBL	Annual
		Amount of completed retail, office and leisure development	n/a	LBL	Annual
Employment opportunities	To increase access to local employment	% of population of working age who claim unemployment benefit by age	n/a	Census	10 years
		Number of years unemployed by age	n/a	Census	10 years
		Total amount of additional employment floorspace	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		– by type Losses of employment land No net loss of B use class floor space in defined employment land areas - (Strategic Industrial Location (SIL), Local Employment Location (LEL), and Mixed Use Employment Location (MEL))			

## 7 Appendix I – DMLP Policies

### **DM Policy 1**

#### **Presumption in favour of sustainable development**

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.
2. Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
  - a. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or
  - b. specific policies in that Framework indicate that development should be restricted.

### **DM Policy 2**

#### **Prevention of loss of existing housing**

1. The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use in the following circumstances:
  - a. the proposed redevelopment would result in housing gain which regenerate and replace older housing estates in line with an agreed plan or strategy
  - b. the land or premises are allocated for another use in an adopted Local Plan
  - c. a change of use to a local community service or facility is proposed that meets an identified need
  - d. an economic viability study confirms that the dwelling/s cannot be rehabilitated to a satisfactory standard at reasonable cost
  - e. evidence shows that environmental problems are such that demolition and redevelopment is the only effective option.
2. The reconversion of a former single dwelling house with multiple dwellings to a single dwelling may be acceptable in predominantly residential areas

suitable for family occupation subject to amenity considerations and DM Options 30, 31, 32 and 33.

### **DM Policy 3**

#### **Conversion of a single dwelling to two or more dwellings**

1. The Council will refuse planning permission for the conversion of a single dwelling into flats except where environmental conditions mean that the house is not suitable for family accommodation due to any factor listed below:
  - a. Adjacent to noise generating or other environmentally unfriendly uses
  - b. Lack of external amenity space suitable for family use
2. Any house considered suitable for conversion according to point 1 of this policy will need to have a net internal floorspace greater than 130 sq. m.
3. All conversions must meet the general design requirements and housing standards in DM Policy 25 (Landscaping and trees), DM Policy 29 (Car parking), DM Policy 30 (Urban design and local character), DM Policy 31 (Alterations and extensions to existing buildings including residential extensions) and DM Policy 32 (Housing design, layout and space standards).

### **DM Policy 4**

#### **Conversions of office space and other B Use Class space into flats**

1. The Council will support the conversion of office space and other B Use Class space into self contained flats in the following circumstances:
  - a. the proposal does not conflict with other policies in relation to employment floorspace (DM Policies 9, 10, 11)
  - b. the proposal meets the standards set out for residential development in DM Policy 32 (Housing design, layout and space standards)
  - c. the proposal achieves a good living environment with adequate access, parking and safety standards, refuse storage and collection arrangements.

### **DM Policy 5**

#### **Sheltered housing and care homes**

1. The Council will support proposals for sheltered housing and care homes provided that the development:
  - a. will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and or care
  - b. will be easily accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of

the intended occupiers as well as immediate proximity to local services.

2. In the case of self-contained sheltered housing in Use Class C3, the Council will expect the development to make a contribution to the supply of affordable housing in accordance with Core Strategy Policy 1. In the case of care homes, particularly for older people, the Council will encourage a mix of tenures.
3. The Council will support development of care homes that combine independent living with the availability of support and nursing care.
4. The Council will resist development that involves the net loss of floorspace in sheltered housing and care homes unless:
  - a. adequate replacement accommodation will be provided that satisfies criteria 1.a and 1.b above or
  - b. it can be demonstrated that there is a surplus of care homes in the area and
  - c. it can be demonstrated that the existing care homes are incapable of meeting relevant industry standards for suitable accommodation.
5. Where the Council is satisfied that a development involving the loss of sheltered housing or care homes, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

## **DM Policy 6**

### **Houses in multiple occupation (HMO)**

1. The Council will consider the provision of new Houses in Multiple Occupation where they:
  - a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher
  - b. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood
  - c. do not result in the loss of existing larger housing suitable for family occupation
  - d. satisfy the housing space standards outlined in DM Option 32 and
  - e. satisfy the appropriate Environmental Health standards.
2. The Council will resist the loss of good quality Houses in Multiple Occupation.
3. The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

## **DM Policy 7**

### **Affordable rented housing**

1. The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.
2. If providing affordable rented housing:
  - a. the percentage of dwellings designated for this tenure shall be negotiated with the Council to ensure homes are genuinely affordable for households on low incomes
  - b. rents should not exceed 'target rents' for dwellings of 3 bedrooms or more and
  - c. such dwellings are to remain at 'target rent' levels in perpetuity.

## **DM Policy 8**

### **Student housing**

1. The Council will support proposals for student housing provided that the development:
  - a. will not involve the loss of permanent self-contained homes
  - b. will not involve the loss of designated employment land
  - c. will not involve the loss of leisure or community space
  - d. will not prejudice the Council's ability to meet its annual London Plan housing target for additional self-contained homes
  - e. has an identified end user affiliated with an educational institution or student housing management company
  - f. is well served by public transport and is accessible to a range of town centre, leisure and community services
  - g. provides a high quality living environment and includes a range of unit sizes and layouts, with and without shared facilities, to meet the requirements of the educational institutions it will serve
  - h. complies with all relevant national and local standards and codes including ANUK and any relevant standards for houses in multiple occupation (HMOs)
  - i. demonstrates that it is suitable for year round occupation and that it has long term adaptability and sustainability, including adequate and suitable cycle parking
  - j. contributes to creating a mixed and inclusive community and
  - k. does not cause unreasonable harm to residential amenity or the surrounding area.

- l. provides 10% wheelchair accessible rooms fully fitted from occupation.
2. The Council will resist development that involves the net loss of student housing unless:
  - a. adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or
  - b. the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Lewisham or adjoining boroughs.
3. Where the Council is satisfied that a development involving the loss of student housing is justified, the replacement development is to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

## **DM Policy 9**

### **Mixed use employment locations**

1. The Council will require applications for changes of use of B Use Class floorspace to ensure that these sites continue to meet the Core Strategy aims for high density mixed use development that contributes to the local economy and provides a range of local employment opportunities, including lower cost accommodation suitable for starter businesses. Core Strategy Policy 4 requires 20% of the built floorspace of mixed use developments on these sites to be in the B Use Class. Future changes of use should ensure that the proportion of B uses within the development does not fall below that which was originally granted permission in line with the aims of the Core Strategy.
2. New development or proposals for a change of use, should ensure that a variety of uses continues to be provided that take advantage of the location which is close to central London, to supply spaces in flexibly specified buildings that allow for the continued employment functioning of an area in line with Core Strategy Policy 4, for businesses in identified growth sectors such as business services, food and the creative industries.
3. New proposals will need to be provided with an internal fit out to an appropriate level to ensure the deliverability and long term sustainability of the employment uses on the site and be designed to ensure future flexibility of use by a range of businesses in the B Use Classes in line with Core Strategy Strategic Site Allocations 2, 3, 4, 5.
4. Proposals for changes of use of non residential floorspace to residential use will not be considered appropriate on MELs due to the need to ensure that the balance of uses on the site is retained.

## **DM Policy 10**

### **Local Employment Locations (LEL)**

1. The Council will consider uses within the B Use Class, within a Local Employment Location, subject to:
  - a. the use being appropriate in the location in relation to the surrounding built context,
  - b. the intensity of the use, and
  - c. the new use meeting the aims in the Core Strategy Policy 3.
2. Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses.
3. New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses. The provision of lower cost accommodation suitable for starter businesses should form part of any new scheme.
4. Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.

## **DM Policy 11**

### **Other employment locations**

#### **Sites in Town Centres, District and Local Hubs and other clusters of commercial and/or retail uses**

1. The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, District and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses and where the use is compatible with the surrounding built context by reason that they:
  - a. are well located in relation to the highway network
  - b. are well located in relation to town centres and public transport
  - c. offer the potential for the expansion of existing in-situ businesses
  - d. offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area and
  - e. provide lower cost accommodation suitable for small, start-up businesses.
2. Redevelopment of a site on a commercial street frontage will be supported when the site or building is redeveloped to a high standard of environmental

and design quality in line with the other policies in this plan, and a business use is retained on the ground floor and a business and/or residential development on upper floors where an appropriate standard of amenity can be achieved. Uses not within the B Use class, such as retail, leisure, or other uses appropriate to a town centre or local hub will be considered as part of a mix of uses where the number of jobs created by the proposal outweighs the loss of an employment site, and results in no net loss of jobs.

3. Where uses are proposed for a site or building in employment or retail use that do not involve any job creation or retention, the Council will require evidence that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.

### **Sites in residential areas**

4. Applications for redevelopment for change to other business uses suitable for a residential area will approved where:

- a. the site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing or an alternative business use by reason of access difficulties or environmental incompatibility, and
- b. that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.

5. A mix of uses in a new scheme will be considered positively subject to the context of the site and meeting the requirements of other policies in this plan, including, in the case of any residential development proposed as part of a scheme an appropriate level of amenity and the suitability of the site for this use.

### **All sites**

8. The Council will seek contributions to training and/or local employment schemes where there is loss of local employment as a result of redevelopment or change of use.

9. New build business and retail premises should be provided with an internal fit out to an appropriate standard to attract new occupiers and ensure long term sustainable development, and provide a proportion of lower cost accommodation suitable for start-up businesses.

## **DM Policy 12**

### **Hotels**

1. The Council will encourage the provision of hotels in appropriate locations, with a preference given to those in highly accessible sections of town centres, in close proximity to train stations or other locations where there is good public transport access.

2. The Council will support proposals for new hotels provided that the development:

- a. is of the highest design quality, is sympathetic to its surroundings and heritage and enhances the image of the area
- b. contains ground floor uses that will ensure active frontages and where appropriate add to the vitality of the area throughout the day and evening
- c. seeks to improve the range and quality of accommodation available within the borough
- d. meets the highest standards of accessibility and inclusion, and demonstrates that at least 10% of the hotel bedrooms will be wheelchair accessible
- e. provides an adequate level of car parking depending upon the location and the accessibility of the hotel, with lower levels of car parking expected within town centres and in areas where there is good public transport accessibility and a preference for car free development wherever possible
- f. is able to facilitate coach and/or taxi drop off and collection, either on or off site, in a manner that respects the surrounding character and is without detriment to the safety of other vehicle users, pedestrians and cyclists
- g. maximises pedestrian linkages and demonstrates opportunities for walking, cycling and sustainable travel
- h. demonstrates that it plans for long term adaptability and sustainability.

3. The Council will consider the conversion of other use classes (except C3 Residential) into hotels provided that the existing buildings can be suitably converted to accommodate hotel rooms and a range of ancillary hotel facilities and it does not conflict with other policies in the plan.

### **DM Policy 13**

#### **Location of main town centre uses**

1. The location of main town centre uses needs to be in accordance with Core Strategy Policy 6. For major retail development (over 1,000 square metres), if suitable sites are not available in the major and district centres then edge of centre sites should be considered, followed only then by out-of-centre sites in locations that are accessible by public transport, walking and cycling and are well connected to the town centre.
2. Proposals for retail provision of 1,000 square metres gross floorspace or more on the edge or outside of the major and district centres will require an impact assessment and will only be considered if the following criteria are satisfied:
  - a. there is a quantitative and qualitative need for the proposal
  - b. there are no other sites available in accordance with the sequential test
  - c. the proposal, either by itself or together with other recently or committed developments, would not demonstrably harm the vitality and viability of an existing shopping centre

- d. the proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres
- e. the proposal is sited so as to reduce the number and length of car journeys and can serve not only car journeys but also those on foot, bicycle or public transport
- f. the proposal is not on designated employment land as shown on the Policies Map and for which a demand can be established and
- g. if planning permission were to be granted then a planning obligation may be negotiated.

## **DM Policy 14**

### **District centres shopping frontages**

1. Within the primary shopping frontages of the Blackheath, Deptford, Downham, Forest Hill, Lee Green and Sydenham district centres (as shown on the Policies Map), the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would meet all of the following criteria:
  - a. not harm the predominant retail character of the shopping frontage
  - b. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together and 70% of A1 uses maintained in the primary shopping frontage
  - c. generate a significant number of pedestrian visits, thereby avoiding the creation of an area of relative inactivity in the shopping frontage
  - d. occupy a vacant unit, having regard to both their number within the district centre as a whole and the primary frontage and the length of time the unit has been vacant
  - e. not result in adverse effects caused by crime, disorder and anti-social behaviour.
2. Within the secondary shopping frontages of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Policies Map) the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would meet all of the following criteria:
  - a. introduce an A2, A3, A4 or D2 use
  - b. not harm the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
  - c. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together
  - d. not harm the retail character, attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units

- e. retain an appearance which is compatible with adjoining shop units including window presentation
  - f. provide an active frontage at ground floor level
3. The Council will not support ground level residential uses within the primary or secondary shopping frontage.
  4. Outside the primary and secondary shopping frontages areas of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Policies Map) the Council will consider applications for development or a change of use from a ground floor shop (Class A1) where the following are met:
    - a. the amenity of adjoining properties is not harmed
    - b. the character, attractiveness, vitality and viability of the centre as a whole is not harmed
    - c. in the case of a change to a residential use, the proposal would not result in a harmful break to the continuity of the retail frontage.

## **DM Policy 15**

### **Neighbourhood Local Centres**

1. Within the designated neighbourhood local centres of Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, the Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.
2. A change of use to non-A1 uses will only be considered if the following criteria are satisfied:
  - a. a high standard of design and appropriate layout is achieved, including high quality shopfronts, in accordance with DM Policy 19
  - b. provision of an attractive window display
  - c. reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent
  - d. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)
  - e. a balance to the number and type of units within the centre (where 40% of A1 uses are maintained)
  - f. there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
  - g. there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation

- h. that adequate provision for access for people with disabilities is made, and
  - i. the use would not result in adverse effects caused by crime, disorder and anti-social behaviour.
3. A change of use to residential at ground floor will only be permitted:
- a. at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage, and
  - b. where the design and materials of the residential frontage is of the highest quality and relate well to the proportion, scale and detailing of the entire host building, adjoining buildings and make a positive contribution to the streetscape.

## **DM Policy 16**

### **Local shopping parades and corner shops**

1. The Council will require the retention of Class A1 shops located in a local shopping parade or operated as a corner shop in order to preserve or enhance the local character and support the provision of essential daily goods and services, unless an applicant can demonstrate:
  - a. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)
  - b. a balance to the number and type of units within the parade
  - c. that reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent
  - d. the replacement use will result in no harm to the amenity of adjoining properties
2. A change of use to residential at ground floor will only be permitted:
  - a. at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage, and
  - b. where the design and materials of the residential frontage is of the highest quality and relate well to the proportion, scale and detailing of the entire host building, adjoining buildings and make a positive contribution to the streetscape.

## **DM Policy 17**

### **Restaurants and cafés (A3 uses) and drinking establishments (A4 uses)**

1. The Council will consider proposals for restaurants and cafés (A3) and drinking establishments (A4) provided the following are met:
  - a. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area

- b. there is no harm to the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours
  - c. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians
2. In addition, applicants will be expected to provide acceptable arrangements for:
- a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
  - b. the collection, storage and disposal of bulk refuse and customer litter
  - c. sound proofing, especially if living accommodation is above or adjacent
  - d. other appropriate mitigation measures in relation to the impact on neighbours of the proposed opening hours.

## **DM Policy 18**

### **Hot food take-away shops (A5 uses)**

1. The Council will not grant planning permission for new hot food take-away shops that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).
2. The Council will only consider granting planning permission for new hot food take-away shops (A5) outside of the exclusion zone where:
  - a. the percentage of hot food take-away shops (A5) in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10%
  - b. the number of hot food take-away shops (A5) in Local Parades of nineteen units or less does not exceed one hot food take-away shop
  - c. the number of hot food take-away shops (A5) in Local Parades of twenty or more units does not exceed two hot food take-away shops
  - d. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area (in accordance with DM Policy 19 - Shopfronts)
  - e. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and
  - f. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.
3. In addition, applicants will be expected to provide acceptable arrangements for:

- a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
- b. the collection, storage and disposal of bulk refuse and customer litter
- c. sound proofing, especially if living accommodation is above or adjacent and
- d. other appropriate mitigation measures in relation to the impact on neighbours of the proposed opening hours.

## **DM Policy 19**

### **Shopfronts, signs and hoardings**

1. Shopfronts should be designed to a high quality and reflect and improve the character and quality of their surroundings. This will be achieved by the following:
  - a. retention of high quality shop fronts both within and outside Conservation Areas. This includes retention of original fascia, pilasters and columns including where shops units are combined. Where retention is not possible replacements should use high quality materials and use a design appropriate to the period and character of the building
  - b. new shopfronts and the replacement of non-period shopfronts should use high quality materials and use a design that relates well to the proportion, scale and detailing of the entire host building and makes a positive contribution to the streetscape. Where possible existing original pilasters, brackets and fascia should be retained and new shopfronts should relate well to these features
  - c. new shop signs should relate successfully to the architectural features and detailing of the building. Architectural features such as cornices, pilasters and columns should not be obscured
  - d. provision of separate access to any residential accommodation on other floors and encourage the restoration of such access if already removed
  - e. provision of suitable access for people with disabilities in new shop fronts
  - f. provision of storage for refuse bins where possible
  - g. refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and character of an area or adversely impact on highway safety and operations
  - h. roller grilles and shutters for security purposes should be of an open mesh variety leaving the shop window visible, with the box for any grille or shutter contained behind the fascia where possible

- i. within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they are successfully related to the design and detailing of the building and positively contribute to the special character of a group of buildings or the street.
2. The Council will not grant consent for the display of poster hoardings. Temporary hoardings may be suitable for some form of public art.

## **DM Policy 20**

### **Public houses**

1. The Council will only permit the change of use or redevelopment of a public house (A4) after an assessment of the following:
  - a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including the length of time the public house has been vacant, evidenced by the applicant of active and appropriate marketing for a constant period of at least 36 months at the existing use value
  - b. the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision, including evidence that the premises have been offered to use or to hire at a reasonable charge to community or voluntary organisations over a 12 month period and there is no longer a demand for such use
  - c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance
  - d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.
2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained, and for the ground floor to remain in use for a range of non-residential uses, including D1, as appropriate.
3. The proposed change of use of a public house for residential use will only be acceptable where:
  - a. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features and
  - b. where the Council is satisfied that residential use is acceptable, the accommodation to be provided is to be of the highest quality and

meet the requirements outlined in DM Option 32 (Housing design, layout and space standards).

## **DM Policy 21**

### **Mini cab or taxi offices**

1. The Council will consider planning permission for mini cab or taxi businesses only in locations where they:
  - a. would not cause any adverse impact on the surrounding area by virtue of traffic congestion, including parking, which would be of detriment to the safety of other vehicle users, pedestrians and cyclists
  - b. are well lit and have good CCTV facilities and
  - c. would not have a detrimental effect on the amenities of adjoining property, especially residential occupiers, including that caused by noise disturbance.

## **DM Policy 22**

### **Sustainable design and construction**

1. In addition to those policies in the London Plan and Lewisham's Core Strategy Policies 7 and 8, the Council will require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling using the following hierarchy:
  - a. passive solar design to optimise energy gain and reduce the need for heating,
  - b. passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat,
  - c. mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical cooling followed by air conditioning, and
  - d. full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.
2. For conversions to residential from other uses, the Council will require cost effective and proportional energy efficiency measures to be carried out where feasible to a value not exceeding 10% of the overall construction costs.
3. For minor residential extensions, the Council will seek to deliver the highest BREEAM standard provision possible for the new part and will encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.
4. For non-residential extensions and conversions, the Council will seek to deliver the highest BREEAM standard provision possible for both the new

and existing parts of the development. Evidence will be required to justify the standard proposed.

5. In relation to Core Strategy Policy 8 bullet 4, where industrial (B2 and B8) uses may not be able to provide a minimum of BREEAM 'Excellent' standard, as they are delivering only the 'shell and core' of the building and not a full fit out. In these circumstances the Council will seek to secure the maximum points possible for those sections of the BREEAM assessment that are relevant to delivering 'shell and core' and as a minimum, at this stage, the overall BREEAM rating should be 'Very Good'. The Council will encourage the use of Allowable Solutions to assist in this process.

### **DM Policy 23**

#### **Air quality**

1. The Council will require all major developments that have the potential to impact on air quality to submit an Air Quality Impact Assessment (AQIA) considering the potential impacts of pollution from individual and cumulative development on the site and on neighbouring areas and detailing any appropriate mitigation measures that would reduce exposure to acceptable levels.
2. Applications for planning permission for all new developments that have the potential to impact on air quality in an Air Quality Management Area (AQMA) will not be permitted to include a biomass boiler.

### **DM Policy 24**

#### **Biodiversity, living roofs and artificial playing pitches**

1. The Council will require all new development to:
  - a. take full account of appropriate Lewisham and London Biodiversity Action Plans in development design and ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity and
  - b. use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Chartered Institute of Ecology and Environmental Management (CIEEM). The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value.
2. New living roofs are required to be designed and fitted by a qualified and accredited installer and include an extensive substrate base, except where it can be demonstrated that such a base is not feasible and achievable. Developers should enter into an agreement with an installer that guarantees 80% coverage in 5 years.
3. Artificial grass sport pitches are required to be delivered on hard surfaces and previously developed land rather than on existing natural grass, wherever feasible. Applicants should give consideration to the potential loss of open

space, the effect on drainage and surface water flooding and the impact of the pitch, lighting and use on the amenity of the adjacent areas.

## **DM Policy 25**

### **Landscaping and trees**

1. Applicants for all major development and, where appropriate, non-major development will be required to submit a Landscape Scheme, proportionate to the size of the development, containing:
  - a. a Landscape Plan for areas not occupied by buildings that takes note of the relevant site features and indicates those that are to be retained, including trees and the presence of any species of nature conservation interest,
  - b. details of all enabling work required to ensure the implementation of the Landscape Plan,
  - c. a 5 year Landscape Management Plan detailing the provision, management and maintenance of high quality hard and soft landscapes and trees.
2. Applicants for all major development and, where appropriate, non-major development (and always when there is a Tree Preservation Order in place) will be required to:
  - a. submit an Arboricultural Survey carried out by an appropriate, competent person, in line with BS5837
  - b. retain existing trees for the most part and in the event of tree removal, replacement planting will normally be required. New and replacement tree planting must use an appropriate species that reflects the existing biodiversity in the borough.

## **DM Policy 26**

### **Noise and vibration**

1. The Council will require:
  - a. noise and/or vibration generating development or equipment to be located in the Strategic Industrial Locations and Local Employment Locations as shown on the Local Plan Policies Map,
  - b. new noise sensitive developments are to be located away from existing or planned sources of noise pollution, except if it can be demonstrated through design or mitigation that:
    - i. internal and external noise levels can be satisfactorily controlled and managed by the noise sensitive development; and
    - ii. there will be no adverse impact on the continued operation of any existing or proposed business or operation.

- c. a Noise and Vibration Assessment for noise and/or vibration generating development or equipment and new noise sensitive development, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken.

## **DM Policy 27**

### **Lighting**

1. The Council will require applicants to protect local character, residential amenity and the wider public, biodiversity and wildlife from light pollution and nuisance, by:
  - a. taking appropriate measures in lighting design and installation in line with the Institute of Lighting Professionals' Guidance Notes for the Reduction of Obstructive Light (2011) to control the level of illumination, glare, spillage of light, angle and hours of operation,
  - b. using energy efficient and solar powered lighting for energy conservation where feasible,
  - c. providing sensitive lighting for footpaths, cycling paths and public parking areas in the development with particular consideration of the potential adverse impact on biodiversity,
  - d. preventing the adverse impact of light pollution at all stages of development, from building demolition and construction to occupation.

## **DM Policy 28**

### **Contaminated Land**

1. The Council will use the following steps to ensure that contaminated land is fully investigated and remediated, to minimise and mitigate any harmful effects to human health and the environment. This is applicable wherever development is proposed on contaminated land, land suspected of being contaminated, or if a sensitive use is proposed to ensure contamination is properly addressed. Applicants are required to:
  - a. complete a Preliminary Risk Assessment, consisting of a desk top study and site walkover report that shows all previous and existing uses of the site and adjacent land, and which assesses what the potential contamination risks to identified receptors are,
  - b. undertake a Site Intrusive Investigation, where necessary, to provide sufficient information to characterise the site and provide for a detailed assessment of the risks to all receptors that may be affected, including those off site,
  - c. obtain a Remediation Strategy, where contamination exists, for the Council's approval to deal with the identified hazards to ecosystems, humans, property and controlled waters and subsequent management and monitoring arrangements,

- d. submit a Verification Plan for any remediation works, completed by a suitably qualified person that would be fully implemented and verified before occupation of the site to ensure effective measures would be taken to treat, contain or control the contamination in order to protect:
  - i. the occupiers of development and neighbouring land uses,
  - ii. the structural integrity of new and existing buildings and
  - iii. any watercourse, water body or aquifer.
- e. submit a Verification Report, before occupation of the site, demonstrating completion and validation of works set out in the approved Remediation Strategy and the effectiveness of the remediation, for approval in writing by the Council. The report shall include results of sampling and monitoring carried out in accordance with the approved Verification Plan to demonstrate that the site remediation criteria have been met.

## **DM Policy 29**

### **Car parking**

1. The Council will require parking standards in accordance with Core Strategy Policy 14.
2. Car limited major development will only be considered where there is:
  - a. PTAL level 4 or higher, or where this can be achieved through investment in transport infrastructure and services,
  - b. no detrimental impact on the provision of on-street parking in the vicinity,
  - c. no negative impact on the safety and suitability of access and servicing,
  - d. protection of required publicly accessible or business use car parking,
  - e. inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site car parking provision,
  - f. an equitable split of parking provision between private and affordable residential development,
  - g. on-site accessible priority parking for disabled drivers.
3. Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street car parking.
4. Wheelchair accessible car parking is required to be provided in accordance with best practice standards.
5. All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed. Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.

6. Schemes will provide appropriate levels of parking for motorcycles.

## **DM Policy 30**

### **Urban design and local character**

#### **General principles**

1. The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met. This policy is supported by various Supplementary Planning Guidance Documents as referenced in the Core Strategy.
2. Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in the Lewisham Borough Wide Character Study (2010).
3. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and the development of a sense of place. Their value and significance as a heritage asset will be assessed as part of any development proposal.
4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.

#### **Detailed design issues**

5. An adequate response to the following detailed matters will be required in planning applications to demonstrate the require site specific design response:
  - a. The creation of a positive relationship to the existing townscape, natural landscape, open spaces and topography to preserve and/or create an urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape, open space and views and vistas, taking all available opportunities for enhancement
  - b. height, scale and mass which should relate to the urban typology of the area as identified in the Lewisham Borough Wide Character Study (2010)
  - c. layout and access arrangements. Large areas of parking and servicing must be avoided.
  - d. how the scheme relates to the scale and alignment of the existing street including its building frontages
  - e. the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities

and the public transport network, including meeting the needs of disabled and older people and people with young children.

- f. the quality and durability of building materials and their sensitive use in relation to the context of the development. Materials used should be high quality and either match or complement existing development, and the reasons for the choice of materials should be clearly justified in relations to the existing built context
- g. details of degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials
- h. how the development at ground floor level will provide activity and visual interest for the public including to the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain
- i. new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8
- j. Where there is an impact on a heritage asset a statement will be required that describes the significance of the asset, including its setting, and an assessment of the impact of the proposals upon that significance.

### **DM Policy 31**

#### **Alterations and extensions to existing buildings including residential extensions**

1. Development proposals for alterations and extensions, including roof extensions will be required to be of a high site specific, sensitive design quality and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, porches etc, and use high quality matching or complementary materials appropriately and sensitively in relation to the context. New rooms provided by extensions to residential buildings will be required to meet the space standards in DM Policy 32 Housing Design, layout and space standards.
2. In addition, where it is necessary:
  - a. side extensions should normally be set back and down from the main building line to allow for a clear break between existing buildings and the new work to maintain architectural subordination to the original building.
  - b. Rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope. Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building. Rooflights

on the front roof slope of buildings should be considered in relation to the design of the dwelling and harmonise with the street-scene.

- c. Residential extensions, roof terraces and balconies and non-residential extensions adjacent to dwellings should result in no significant loss of privacy and amenity (including sunlight and daylight) to adjoining houses and their back gardens. Residential extensions should retain an accessible and usable private garden that is appropriate in size in relation to the size of the property, and retain 50% of the garden area.
  - d. additional or enlarged windows, doors etc. should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged.
  - e. Details of plant, pipework, fire escapes, lifts and other mechanical equipment including ducts and flues should be included within the initial planning application and be enclosed within the envelope of the building or, where that is impracticable, sited where they will have the least visual impact.
  - f. The council will consider proposals for building extensions that are innovative and have exceptional design quality where these are fully justified in the design and access statement
3. Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area.
  4. Where the roofline or party walls of buildings or terraces are exposed to long views from public spaces, a roof extension in any form that would have an obtrusive impact on that view will not be permitted.

## **DM Policy 32**

### **Housing design, layout and space standards**

#### **Siting and layout of development**

1. The siting and layout of new build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.
2. New build housing development will be required to be:
  - a. sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment. Table 2.2 Sustainable Residential Quality Matrix will be used to aid assessment of the appropriate density of development in relation to public transport accessibility and character areas
  - b. provided with a readily accessible, secure, private and usable external space and include space suitable for children's play

- c. designed so that that schemes in mixed tenure do not distinguish between public and private housing provision either in terms of quality of materials and design, or in level of amenities
  - d. designed to be safe and secure and reduce crime and the fear of crime.
3. The South East London Housing Partnership Wheelchair Homes Design Guidelines (or as subsequently amended) will be used to assess whether new build housing schemes meet Lifetime Homes and Wheelchair Housing Standards both in terms of internal layout and the external design features needed to ensure houses are accessible to their users.

### **Internal standards**

4. The standards in the London Plan and the London Plan Housing Supplementary Planning Guidance (2012) will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals provide accommodation that meet the following criteria:
- a. meet the minimum space standards for new development which should conform with the standards in the London Plan and the London Plan Supplementary Planning Guidance on Housing (as updated).
  - b. habitable rooms and kitchens and bathrooms are required to have a minimum floor height of 2.5 m. between finished floor level and finished ceiling level. Space that does not meet this standard will not count towards meeting the internal floor area standards.
  - c. provide accommodation of a good size, a good outlook, with acceptable shape and layout of rooms, with main habitable rooms receiving direct sunlight and daylight, and adequate privacy. There will be a presumption that residential units provided should be dual aspect. Any single aspect dwellings provided will require a detailed justification as to why a dual aspect dwelling is not possible and a detailed demonstration that adequate lighting and ventilation can be achieved. North facing single aspect flats will not be supported.
  - d. family housing (dwellings with three or more bedrooms) should be designed to have the potential to separate dining and living accommodation from the kitchen area in order to ensure privacy for the occupants.
  - e. Studio flats (one person dwellings at GIA 37 sq. m.) will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations in the major and district town centres.
  - f. include sufficient space for storage and utility purposes in addition to the minimum space standards.

### **DM Policy 33**

#### **Development on Infill Sites, Backland Sites, Back Gardens and Amenity Areas**

#### **General principles**

1. Depending on the character of the area and the urban design function a space fulfils in the streetscape, some sites will not be considered suitable for development and planning permission will not be granted.
2. If a site is considered suitable for development, planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape, and sensitive to the setting of heritage assets. This includes the importance of spaces between buildings which may be as important as the character of the buildings themselves, and the size and proportions of adjacent buildings.
3. Development on these sites must meet the policy requirements of DM Policy 30 (Urban design and local character), DM Policy 32 (Housing design and space standards) and DM Policy 25 (Landscaping and trees).
4. Development on these sites should retain existing formal or informal pedestrian through routes.

#### **A. Infill sites**

5. Development within street frontages and on street corners will only be permitted where they:
  - a. make a high quality positive contribution to an area
  - b. provide a site specific creative response to the character and issues of the street frontage typology identified in the Lewisham Character Study, and any relevant Conservation Area Appraisal
  - c. result in no significant overshadowing or overlooking, and no loss of security to adjacent houses and gardens
  - d. provide appropriate amenity space in line with DM Policy 32 (Housing Design, Layout and Space Standards)
  - e. retain appropriate garden space for adjacent dwellings
  - f. repair the street frontage and provide additional natural surveillance
  - g. provide adequate privacy for the new development and
  - h. respect the character, proportions and spacing of existing houses.

#### **B. Backland sites**

6. New development on sites of this type will only be permitted where they provide:
  - a. a proper means of access and servicing which is convenient and safe both for drivers and pedestrians
  - b. no significant loss of privacy, amenity, and no loss of security for adjoining houses and rear gardens and

- c. the provision of appropriate amenity space in line with the policy requirements in DM Policy 32 (Housing Design, layout and space standards).
7. Gated developments on these sites that prevent access which would normally be provided by a publicly accessible street will not be supported.

### **C. Back gardens**

8. The development of back gardens for separate dwellings in perimeter form residential typologies identified in the Lewisham Character Study will not be granted planning permission. Private back gardens in all urban typologies should be retained in development proposals involving new separate dwellings.

### **D. Amenity areas**

9. Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:
  - a. repair or re-provide active street frontages
  - b. increase natural surveillance
  - c. retain existing private rear gardens where they are provided
  - d. retain adequate amenity space for the existing development according to the requirements of DM Policy 32 (Housing design, layout and space standards)
  - e. provide no significant loss of privacy and amenity, and no loss of security for adjoining residential development and private back gardens and
  - f. provide adequate privacy for the new development.

## **DM Policy 34**

### **Thames Policy Area and Deptford Creekside**

1. New development within the Thames Policy Area or on sites adjacent to Deptford Creek will need to, where appropriate, improve the relationship of the River Thames or Deptford Creek with the local context, by:
  - a. maintaining and enhancing the relationships of local views, existing visual links and physical connections, landmarks, recreational facilities, heritage assets such as listed buildings and the archaeological heritage with the river or creek
  - b. providing a mixture of uses on sites to be developed adjacent to the river or creek
  - c. addressing the river or creek as an important part of the public realm, and contribute to the liveliness of the waterfront by providing a mixture of uses including where appropriate the inclusion of public uses on the ground floor of buildings along the Thames Path

- d. encouraging river-related and marine uses where appropriate in line with other policies in the Plan
- e. maintaining and where appropriate enhancing the appearance and nature conservation interest of the river or creek corridor including the river or creek walls and foreshore
- f. resisting encroachment in to the creek or river and foreshore and
- g. maintaining the stability of the flood defences, and examining opportunities to retreat the flood defences to increase flood storage, wildlife and aesthetic value and visual connections with the river or creek.

## **DM Policy 35**

### **Public realm**

1. Public spaces should be designed to be safe, inclusive, accessible, attractive and robust, enhancing existing connections and providing new connections as appropriate. Existing local and historic connections that are valued and contribute to the distinctiveness of the area's public realm and streetscape should be enhanced. The provision of public art will be encouraged. The Council will require street paving and furniture, public art and street signage to:
  - a. be well designed and generously sized using high quality materials
  - b. harmonise with the street scene
  - c. be sited to minimise visual clutter
  - d. provide legible signage
  - e. allow level and safe passage for all including people with disabilities including the careful design of shared surfaces with cyclists
  - f. Conserve and enhance any historic fabric, features and assets.
2. Trees are an important part of the street scene and should be accommodated wherever possible and carefully sited in line with the above principles.
3. In Conservation Areas the Council will seek to ensure that street furniture and paving is compatible with the character of the area.
4. The Council will seek the preservation of historic street furniture and other non designated heritage assets that are of value to the local street scene.

## **DM Policy 36**

### **New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens**

#### **A. General principles**

1. For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.
2. Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.
3. The Council encourages the adaptation of historic buildings to improve energy efficiency in line with the detailed guidance provided by English Heritage. Careful consideration should be given to the most appropriate options for insulation, power use and power generation. Intrusive interventions, such as externally mounted micro-generation equipment or external wall insulation, should be avoided where these would unacceptably alter the character and appearance of the heritage asset. The Council encourages the retention and thermal upgrading of historic windows.

## **B. Conservation areas**

4. The Council having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving and enhancing their character and appearance, will not grant planning permission where:
  - a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials
  - b. development, which in isolation would lead to less than substantial harm to the building or area, but would cumulatively adversely affect the character and appearance of the conservation area
  - c. development adjacent to a Conservation Area would have a negative impact on the significance of that area.
5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary by the use of Article 4 Directions.
6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists.

## **C. Listed buildings**

7. In order to ensure the conservation of Listed Buildings the Council will:
  - a. Only grant consent for alterations and extensions to Listed Buildings which relate sensitively to the building's significance and sustain and enhance its significance and integrity
  - b. Have special regard to the desirability of preserving the setting of Listed Buildings in considering any application in their vicinity in terms of other policies, and consider opportunities for new development

within the setting to enhance or better reveal the significance of the asset

- c. Use its powers under Sections 47, 48 and 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to ensure that Listed Buildings are maintained to a reasonable standard.
8. When considering applications for change of use of Listed Buildings, the Council will consider the contribution of the existing use and the impact of any proposed new use to the significance and long-term viability of the historic building. The Council will seek to ensure that the building is put into an optimum viable use i.e. the one that causes least harm to the significance of the building, not just through initial changes but also as a result of subsequent wear and tear or any likely future changes. The implications of complying with Building Regulations, such as fire escapes, will be taken into account prior to determining applications for change of use.

#### **D. Scheduled Monuments and Registered Parks and Gardens**

9. Scheduled Monuments will be protected and preserved in accordance with Government regulation. Planning permission will be refused which adversely affects their sites or settings.
10. When considering the impact of a development proposal on Registered Parks and Gardens, or on their settings, in Lewisham, the Council will consider that any loss or substantial harm to these assets will be in wholly exceptional circumstances. The Council will apply the provision in Clause 2 of the above policy to the assets.

#### **DM Policy 37**

#### **Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest**

##### **A. General principles**

1. The Council will protect the local distinctiveness of the borough by sustaining and enhancing the significance of non-designated heritage assets.
2. Development proposals affecting non-designated heritage assets should be accompanied by a heritage statement proportionate to the significance of the asset which justifies the changes to the asset.
3. Non-designated heritage assets may be identified during the development management process.

##### **B. Locally listed buildings**

4. The Council will seek to retain and enhance locally listed buildings and structures and may use its powers to protect their character, significance and contribution made by their setting, where appropriate.
5. The Council will resist the demolition of locally listed buildings and expect applicants to give due consideration to retaining and incorporating them in any new development.

### **C. Areas of special character**

6. Development in areas of special local character should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas.
7. The Council will resist demolition of unlisted buildings in areas of special local character where these contribute to architectural and townscape merit and local distinctiveness of the area.

### **D. Non designated heritage assets of archaeological interest**

8. The Council will ensure that non designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.
9. The conservation, protection and enhancement of the archaeological heritage of the borough will be promoted through:
  - a. Requirements to assess and plan for the archaeological implications of development proposals that may affect the archaeological heritage of a site which may require preliminary archaeological site evaluations. Proposals on sites within areas of archaeological priority as shown on the Policies Map should be accompanied by an evaluation. Evaluations should be commissioned from professionally qualified archaeological organisations or consultants.
  - b. Developments should be located and designed to avoid archaeological remains in order to ensure these remain preserved in situ, with public access and display.
  - c. Where permanent preservation is not justified the remains are investigated, recorded and subsequently published by a recognised archaeological organisation prior to the start of development.
  - d. Where remains unexpectedly come to light seeking ensure their preservation or their recording in consultation with the developer.

### **DM Policy 38**

#### **Demolition or substantial harm to designated and non-designated heritage assets**

1. Heritage assets are an irreplaceable resource and the greater the importance of the heritage asset, the greater the weight will be given to its conservation. Proposals for the demolition or substantial harm to a heritage asset will require clear and convincing evidence and will only be considered under exceptional circumstances for Grade II listed buildings, parks or gardens. Substantial harm or loss to designated heritage assets of the highest significance, including scheduled monuments and Grade I and II\* listed buildings will only be considered under wholly exceptional circumstances.
2. Proposals for demolition or substantial harm to designated heritage assets will be refused unless it can be demonstrated that these are necessary to achieve substantial public benefits that outweigh the harm or loss, and that

there is no practical way of realising the benefits without demolishing the building or causing substantial harm.

3. Where applicants cannot demonstrate substantial public benefits all of the following will be taken into account in order to justify the loss or harm:
  - a. The significance of the asset, architecturally, historically, contextually, and any communal value. The greater the significance of the heritage asset, the greater the weight will be given to its conservation.
  - b. The nature and condition of the asset and the economic viability of its repair and re-use
  - c. The adequacy of marketing efforts made that would enable its conservation in the medium term
  - d. The adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership
  - e. The benefits of bringing the site back into use.
4. Development proposals involving substantial structural alterations to a heritage asset need to demonstrate, by way of a structural survey and methodology statement that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.
5. Where demolition is proposed on grounds that a building's condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably qualified conservation professional and must describe, explain and illustrate the structural problems, and discuss repair options.
6. Where demolition or substantial harm is proposed on grounds that repair is not economically viable, the Council will require full supporting evidence, for example:
  - a. a valuation of the existing building and site
  - b. A full survey identifying the repairs required
  - c. development costs including a costed schedule of repairs
  - d. an estimate of the value of the repaired property, including potential yields
  - e. evidence that the property has been marketed for a reasonable period at a price reflecting its condition
7. Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.

8. Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development.

## **DM Policy 39**

### **Domestic satellite dishes and telecommunications equipment**

1. Satellite dishes and other telecommunications equipment should always be designed and sited where they will have the least detrimental visual impact, in particular not on a principal street frontage. They should also not be detrimental to the character of Conservation Areas, Listed buildings and other designated and non designated heritage assets or to the amenities of a residential area. This will usually entail permitting not more than one satellite dish per building and resisting visually harmful development in respect of premises subject to an Article 4 Direction.
2. In carrying out this Policy the Council will:
  - a. encourage the provision of communal telecommunications equipment in new development and rehabilitation schemes and where time limited consents have been granted and
  - b. encourage the removal or upgrading of older telecommunications equipment in order to minimise visual impact.

### **Radio and telecommunications masts and infrastructure**

3. In the case of development proposals for radio and telecommunications masts, including for prior approval under Part 24 of the General Permitted Development Order, these should be supported by the necessary evidence to justify the proposed development. The Council will seek to ensure, in conjunction with operators and developers that in each case the best possible environmental, and operational solution is arrived at. This will include:
  - a. provision of evidence that the possibility of erecting antennae on an existing building, structure, or mast site has been explored, and/or in the case of a new mast or base station that the cumulative exposure when operational will not exceed International Commission in non-ionising radiation protection guidelines
  - b. use of design that minimises the size of or camouflages telecommunications apparatus
  - c. Provision of evidence on the outcome of consultations with organisations with an interest in any proposed development particularly where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site.

## **DM Policy 40**

### **Public conveniences**

1. The Council will expect new developments which attract large numbers of visitors/customers to make adequate provision for public conveniences, which are well located and signed in relation to pedestrian flows, car parks, public transport and other public places and are accessible for all.

#### **DM Policy 41**

##### **Innovative community facility provision**

1. The Council will encourage, where appropriate, the use of innovative solutions to the provision of community meeting space including:
  - a. the potential for new or extended schools to make usable community, sports and leisure space accessible to local people outside of teaching hours and
  - b. the temporary use of vacant or unused inside and outside space for community uses, where it is able to provide a safe and appropriate environment, there is no detriment to local amenity and it is in accordance with the rest of the Local Plan.

#### **DM Policy 42**

##### **Nurseries and childcare**

1. The Council will require applicants for day nurseries and facilities for the care, recreation and education of children to consider:
  - a. the acceptability of the loss of the existing use
  - b. traffic volumes and the effect on congestion
  - c. accessibility by walking, cycling and public transport
  - d. access, egress, cross-site movement and parking / drop off areas, including for disabled users and
  - e. the impact on local residential amenity, including noise
  - f. the need for suitable space for outside play areas.

#### **DM Policy 43**

##### **Art, culture and entertainment facilities**

1. The Council will encourage new or extended art, culture and entertainment uses (including commercial uses) where there is no unacceptable impact on local amenity.
2. The Council will protect existing art, culture and entertainment uses. Redevelopment of such sites will only be allowed where there is re-provision in a new or existing facility.

#### **DM Policy 44**

##### **Places of worship**

1. The Council's preferred locations for the development of public places of worship are the network of major and district town centres as defined in Core Strategy Policy 6.
2. Proposals for development in the major and district town centres and all other areas will only be considered in locations that are:
  - a. highly accessible to users through public transport and cycling and walking routes and
  - b. able to source an adequate level of parking for users, without negatively impacting on local street parking or the accessibility of other local services.
3. All applications for places of worship will be required to:
  - a. demonstrate they are not causing a detrimental effect to employment or future employment space
  - b. demonstrate that there will be no detrimental effect on local amenity through noise, hours of operation or any other environmental impacts
  - c. provide a travel plan to show that the points detailed in Part 1 of this policy and other transport issues can be mitigated and
  - d. be delivered to the highest design standards.

## 8 Appendix II – Sustainability Appraisal Development Management Local Plan – Further Options

# Sustainability Appraisal Development Management Local Plan – Further Options

## Sustainability Appraisal

November 2012

*Prepared for*

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## Abbreviations

AAP	Area Action Plan
AMR	Annual Monitoring Report
ANUK	Accredited Network UK
AQMA	Air Quality Management Area
CS	Core Strategy
DCLG	Department for Communities and Local Government (formerly ODPM)
DEFRA	Department for Fisheries and Rural Affairs
DM	Development Management
DMLP	Development Management Local Plan
DPD	Development Plan Document
EIA	Environmental Impact Assessment
EqAA	Equalities Analysis Assessment
GLA	Greater London Authority
HMO	Homes in Multiple Occupation
HRA	Habitats Regulations Assessment
LBL	London Borough of Lewisham Council
LDF	Local Development Framework
LDS	Local Development Scheme
LEL	Local Employment Location
LPA	Local Planning Authority
LA	Local Authority
LP	Local Plan
MEL	Mixed Use Employment Location
MSW	Municipal Solid Waste
NHS	National Health Service
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister (replaced by DCLG)
PPG	Planning Policy Guidance
PPP	Policies, Plans and Programmes
PPS	Planning Policy Statement
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance Nature Conservation
SPD	Supplementary Planning Document
SPZ	Source Protection Zone
SUDS	Sustainable Urban Drainage Systems

SWMP	Site Waste Management Plan
TIA	Transport Impact Assessment
UDP	Unitary Development Plan
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UK	United Kingdom

FOR CONSULTATION

# 1 Non Technical Summary

This report has been prepared by Mouchel for the London Borough of Lewisham to support the development of the Lewisham Development Management Local Plan.

This document is the Sustainability Appraisal and the Strategic Environmental Assessment of the Lewisham Development Management Local Plan – Further Options version and has been produced following consultation on the following reports:

- Scoping Report 2005<sup>i</sup>
- Issues and Options Report 2005<sup>ii</sup>
- Preferred Options Report 2007<sup>iii</sup>
- Sustainability Appraisal of the Preferred Options 2007<sup>iv</sup>
- Scoping Report 2011<sup>v</sup>

The Planning and Compulsory Purchase Act 2004 (the Act) placed a duty on Local Planning Authorities in England to produce Local Development Documents. These documents form a Local Development Framework - a generic term to describe a portfolio of planning documents, prepared by the Council, which collectively delivers the planning strategy for the Local Authority. Since the publication of the Town and Country Planning (Local Planning) (England) Regulations 2012, terminology has been introduced, with a development plan document now also referred to as a Local Plan.

In Lewisham the following documents have been, or are currently being, prepared:

- Core Strategy - Adopted June 2011
- Site Allocations Local Plan
- Development Management Local Plan
- Local Plans for Lewisham and Catford town centres
- Policies Map
- Supplementary Planning Documents
- Statement of Community Involvement – Adopted July 2006
- Annual Monitoring Report – Latest version 2010/2011

- Local Development Scheme – Version 5 adopted September 2010

The London Borough of Lewisham has been actively engaged in developing its Local Development Documents since 2005.

The Lewisham Development Management Local Plan (DMLP) is subject to a Sustainability Appraisal. Sustainability Appraisals must, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/42/EC).

Guidance issued in November 2005 by the Office of the Deputy Prime Minister (now superseded by the Department for Communities and Local Government) states that “The purpose of Sustainability Appraisal is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans”.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government’s United Kingdom Sustainable Development agenda. The timing of the Sustainability Appraisal in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in the process of policy development.

The Strategic Environmental Assessment Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into United Kingdom law through the Strategic Environmental Assessment Regulations (July 2004).

This report is designed to meet the requirements of an “Environmental Report” as defined in the Directive and as set out in United Kingdom (UK) government guidance on Sustainability Appraisal.

The Development Management Local Plan - Further Options policies and the Sustainability Appraisal have been developed over several years and through a number of stages, each involving extensive consultation. Table 1-1 shows previous Sustainability Appraisal Reports and the DMLP reports and includes the consultation period for each.

Table 1-1 SA Reports and DPD Consultation Periods

Sustainability Appraisal Reports	Local Plan	Consultation Period
Scoping Report 2005  Issues and Options Appraisal 2006	Issues and Options Papers 2005	May 2005
SA of the Preferred Options Report 2007	Preferred Options Report 2007	22 June to 3 August 2007
Revised Scoping Report 2011	N/A	2 Dec 2011 to 13 Jan 2012
SA of the Further Options 2012 (this report)	Further Options Report 2012	Dec 2012 to Jan 2013

The approach and the format of the Sustainability Appraisal Report follow best practice and guidance on Strategic Environmental Assessment and Sustainability Appraisal produced by government organisations and statutory authorities.

The approach adopted for the Sustainability Appraisal was iterative and involved interaction between those individuals responsible for the appraisal and those individuals responsible for development of the Plan as well as consultation with stakeholders as summarised in Table 1-1.

A series of consultation events have taken place leading up to, and as part of the Issues and Options stage (2005) and the Preferred Options stage (2007). Consultation has included a range of techniques including workshops, exhibitions, written consultation, newsletters, online publications, stakeholder meetings and questionnaires.

The flow chart in Figure 1-1 summarises the stages in the Sustainability Appraisal process.

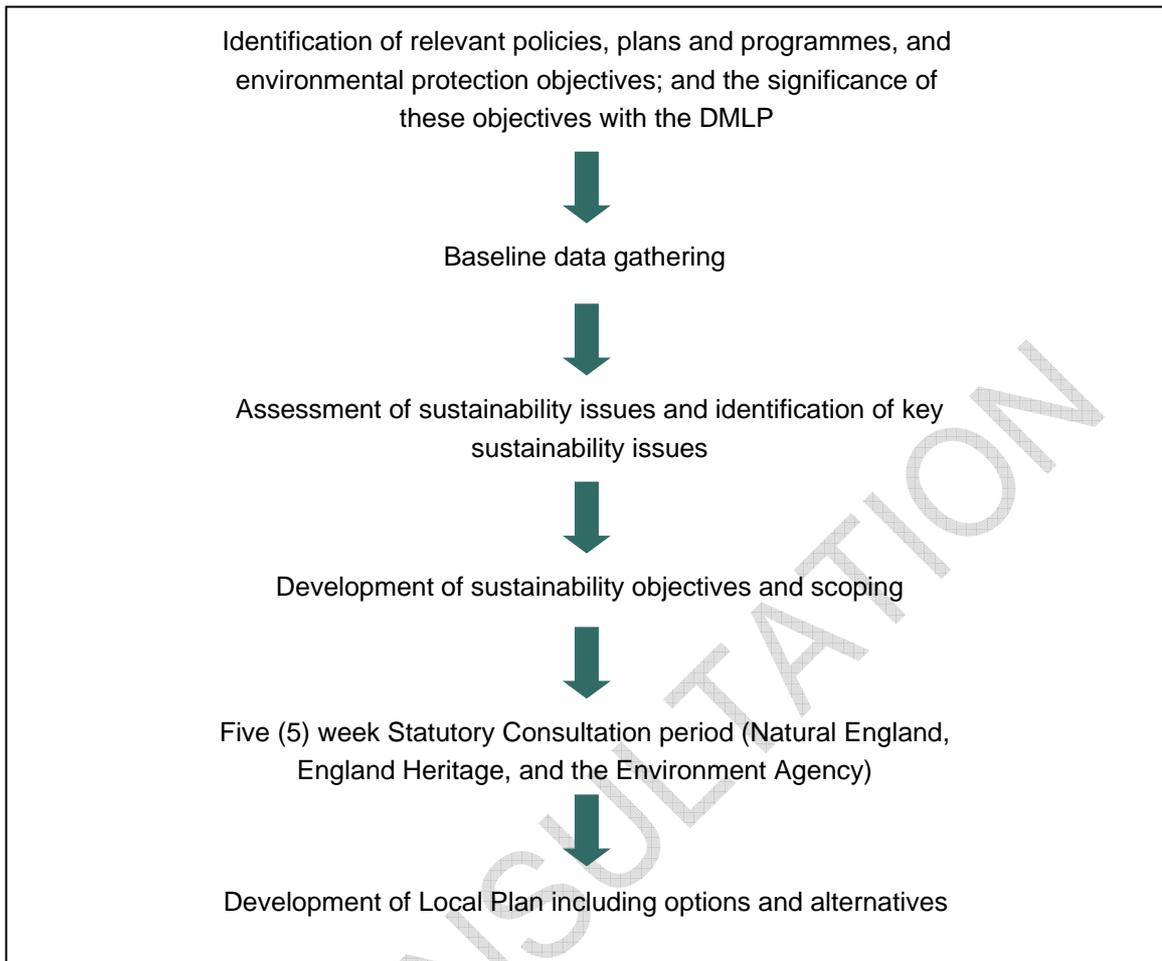


Figure 1-1 - Representation of the stages in the Sustainability Appraisal process

In developing the DMLP a series of options and alternatives were produced (in 2005/06) and a sustainability commentary on the proposed options was prepared to highlight potential conflict or issues and opportunities to strengthen the delivery of the sustainability objectives.

Following consultation on the Issues and Options Report (2005) and the initial Sustainability Appraisal, a detailed range of preferred options which reflected the comprehensive coverage of the issues and options identified by the DPD process was produced. This was accompanied by a Sustainability Appraisal of these preferred options, both of which were consulted upon in 2007.

Further Options for the DMLP have now been developed and will be consulted upon by Lewisham Borough Council. The Sustainability Appraisal has assisted with the development of these DMLP policy options with the likely significant effects on the environment of the DMLP including short, medium and long term-effects,

permanent and temporary effects, and secondary, cumulative and synergistic effects identified through the use of Sustainability Appraisal matrices.

The Sustainability Appraisal highlighted predicted significant effects of the Further Options in relation to:

- *The Local Economy* – Positive long term effects for economic growth and employment are expected, with the retention and protection of employment land and the promotion of retail and business within the town centre. The mixed-use approach adopted by the policy options makes provision for housing, business and open spaces which meet high design standards and contribute to making Lewisham a desirable place to live and work. The effect of these measures is likely to improve the general appeal of Lewisham (and in particular the town centres) for both the public and potential investors, thereby contributing to growing the local economy. The DMLP is therefore expected to have a broadly positive effect on the Lewisham economy and community employment.
- *The Environment* - Broadly positive effects for the environment with improvements to air quality, reductions in noise and vibration, and enhancement of biodiversity and open spaces, expected. These policy options also contribute to mitigation for many of the adverse environmental impacts associated with development and economic growth. Furthermore, the recognition of the importance of sustainable design (including BREEAM and Code for Sustainable Homes standards) and promotion of measures to reduce car-use and congestion are also likely to reduce resource use and contribute to climate change adaptation and mitigation. The cumulative impact of multiple development projects occurring simultaneously will need to be considered at implementation/construction. These could exacerbate short term impacts relating to noise/vibration and air quality, however they can be mitigated through careful phasing of projects and considerate construction practices.
- *Society* – Likely to contribute to long term positive effects on the social fabric of the borough. Various policy options make provision for new high quality housing in a central and easily accessible location, new community facilities, improved public realm and social infrastructure, and a thriving economy and jobs market. These measures, if implemented in conjunction with associated policies designed to reduce adverse effects on the local community (including measures to reduce crime/the fear of crime, sensitive placement of residential housing in relation to noise/antisocial behaviour etc.) will ensure that communities are not adversely impacted by proposed development within Lewisham.

Predicted negative effects have been identified throughout the development of the DMLP and mitigation recommendations have been made and incorporated into the

policy options. This report sets out the mitigation identified and which policies will ensure that the mitigation is addressed to ensure sustainable development is achieved.

The Directive requires that the significant environmental effects of implementing a plan or programme should be monitored “in order to identify unforeseen adverse effects and to be able to undertake remedial action”. Responsible authorities must ensure when designing their monitoring arrangements that they comply with this provision.

This report summarises the process completed to date and, in addition, sets out a proposed list of monitoring activities currently being considered by the borough for the Plan. Some of these have already been incorporated into the DMLP policy options. The list of monitoring activities, the responsibilities for monitoring, and the arrangements for dealing with any unforeseen effects of implementation of the Plan; will be finalised following examination.

### **1.1 Habitats Regulations Assessment**

A Habitats Regulations Assessment screening report will be prepared alongside the preparation of the Proposed Submission Version of the DMLP (or the draft plan). This will be done following the public consultation of the DMLP - Further Options. At this stage the likely significant effects of the draft policies can be properly assessed, in compliance with the Habitats Directive (92/43/EEC) and the Regulations. This approach has been supported by Natural England and was adopted for other Lewisham DPDs.

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European sites to be assessed will be those located within a 15 kilometre radius of the borough boundary as they are considered to be in close enough proximity to potentially be impacted. The report will identify Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation and the Lee Valley Special Protection Area (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors will be presented. The report will provide details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a policy set out in the proposed submission DMLP, could have on the European sites. This includes in combination and cumulative effects.

## 2 Introduction and Methodology

### 2.1 Introduction

This report has been prepared by Mouchel for the London Borough of Lewisham to support the development of the Lewisham Development Management Local Plan (DMLP). This document is the Sustainability Appraisal (SA) and the Strategic Environmental Assessment (SEA) of the DMLP.

This report has been produced following consultation on the SA Preferred Options Report 2007.

Table 2-1 shows all previous SA Reports and DPD Reports and the consultation period for each.

Table 2-1 SA Reports and DPD Consultation Periods

Sustainability Appraisal Reports	Local Plan	Consultation Period
Scoping Report 2005 Issues and Options Appraisal 2005	Issues and Options Papers 2005	May 2005
SA of the Preferred Options Report 2007	Preferred Options Report 2007	22 June to 3 August 2007
Revised Scoping Report 2011	N/A	2 Dec 2011 to 13 Jan 2012
SA of the Further Options 2012 (this report)	Further Options Report 2012	Dec 2012 to Jan 2013

#### 2.1.1 Local Development Framework

The Planning and Compulsory Purchase Act 2004 (the Act) placed a duty on Local Planning Authorities in England to produce Local Development Documents forming a Local Development Framework - a generic term to describe a portfolio of planning documents, prepared by the Council, which collectively deliver the planning strategy for the Local Authority. Since the publication of the Town and Country Planning (Local Planning) (England) Regulations 2012, the documents are now referred to as Local Plans. In Lewisham the following documents have been or are currently being prepared:

- Core Strategy (CS) - Adopted June 2011
- Site Allocations Local Plan
- Development Management Local Plan (DMLP)

- Local Plans for Lewisham and Catford town centres
- Policies Map
- Supplementary Planning Documents (SPD)
- Statement of Community Involvement (SCI) – Adopted July 2006
- Annual Monitoring Report (AMR) – Latest version 2010/2011
- Local Development Scheme (LDS) – Version 5 adopted September 2010

The London Borough of Lewisham has been actively engaged in developing its LDF since 2005.

### 2.1.2 *Lewisham Development Management Local Plan*

The London Borough of Lewisham Council (LBL) is preparing a Development Management Local Plan.

The development management policies will provide a set of criteria based policies by which planning applications for new development and change of use will be judged. These policies will implement the strategic policies of the Lewisham Core Strategy to ensure all proposed development accords with the spatial vision, objectives and strategy for the Borough.

The development management policies are generally criteria based and focus on the following issues:

- Protecting residential amenity;
- Ensuring adequate provision of housing;
- Facilitating environmental improvements;
- Protecting and managing a range of heritage assets;
- Addressing highway and transport issues;
- Protecting the viability and vitality of town centres and local employment areas;
- Addressing visual impact issues; and
- Providing a range of cultural and community facilities.

## 2.2 SEA Directive

Sustainability Appraisals must, where appropriate, incorporate the requirements of the Strategic Environmental Assessment Directive (2001/42/EC) (SEA Directive)<sup>vi</sup>. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. This has been transposed into UK law through the SEA Regulations (July 2004). Table 2-2 outlines the SEA Directive Requirements and how these requirements have been addressed within this report.

Table 2-2 SEA Directive Requirements

SEA Directive Requirements	Where reported
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	This SA report.
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 of this report.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
c) The environmental characteristics of areas likely to be significantly affected;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
d) Any existing environmental problems which are relevant to the plan 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;	Revised Scoping Report 2011. Table 4-1 of this report identifies the key issues.
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;	Section 4.1 and Appendix A of this report.
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. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Section 5 of this report. Plus Appendices C, D, and E.
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;	Section 5.3 of this report.

SEA Directive Requirements	Where reported
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;	Section 2 of the DMLP
i) A description of measures envisaged concerning monitoring in accordance with Article 10;	Section 6 of this report.
<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>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).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process.</p> <p>Tables 5-1, 5-2 and 5-3 summarise the consultation responses received on the SA of the Preferred Options and how these have been addressed.</p>
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	N/A
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process.</p> <p>Tables 5-1, 5-2 and 5-3 summarise the consultation responses received on the SA of the Preferred Options and how these have been addressed.</p>
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	To be confirmed following examination.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).	To be confirmed following examination.

SEA Directive Requirements	Where reported
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This table identifies how the requirements have been met.

## 2.3 Sustainability Appraisal

Guidance issued in November 2005 by the Office of the Deputy Prime Minister (ODPM – now superseded by the Department for Communities and Local Government (DCLG))<sup>vii</sup> states that “The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of Development Plans”.

This process is intended to ensure that planning decisions are made that accord with the principles defined in the government’s UK Sustainable Development agenda. The timing of the SA in the plan making process is aimed at ensuring that sustainability considerations are taken into account early in the process of policy development. Table 2-3 outlines the SA DCLG Guidance Stages.

Table 2-3 DCLG Guidance Stage

DPD Stage 1: Pre-Production – Evidence Gathering
<b>SA Stages and Tasks</b>
<p><b>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</b></p> <ul style="list-style-type: none"> <li>• <b>A1:</b> Identifying other relevant policies, plans and programmes, and sustainability objectives.</li> <li>• <b>A2:</b> Collecting baseline information.</li> <li>• <b>A3:</b> Identifying sustainability issues and problems.</li> <li>• <b>A4:</b> Developing the SA framework.</li> <li>• <b>A5:</b> Consulting on the scope of the SA.</li> </ul>
DPD Stage 2: Production
<b>SA Stages and Tasks</b>
<p><b>Stage B: Developing and refining options and assessing effects</b></p> <ul style="list-style-type: none"> <li>• <b>B1:</b> Testing the DPD objectives against the SA framework.</li> <li>• <b>B2:</b> Developing the DPD options.</li> <li>• <b>B3:</b> Predicting the effects of the DPD.</li> <li>• <b>B4:</b> Evaluating the effects of the DPD.</li> <li>• <b>B5:</b> Considering ways of mitigating adverse effects and maximising beneficial effects.</li> <li>• <b>B6:</b> Proposing measures to monitor the significant effects of implementing the DPDs.</li> </ul>
<p><b>Stage C: Preparing the Sustainability Report</b></p> <ul style="list-style-type: none"> <li>• <b>C1:</b> Preparing the SA Report.</li> </ul>
<p><b>Stage D: Consulting on the preferred options of the DPD and SA Report</b></p> <ul style="list-style-type: none"> <li>• <b>D1:</b> Public participation on the preferred option of the DPD and the SA Report.</li> <li>• <b>D2(i):</b> Appraising significant changes</li> </ul>

<b>DPD Stage 3: Examination</b>
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D2(ii):</b> Appraising significant changes resulting from representations.</li> </ul>
<b>DPD Stage 4: Adoption and monitoring</b>
<b>SA Stages and Tasks</b>
<ul style="list-style-type: none"> <li>• <b>D3:</b> Making decisions and providing information.</li> </ul>
<b>Stage E: Monitoring the significant effects of implementing the DPD</b>
<ul style="list-style-type: none"> <li>• <b>E1:</b> Finalising aims and methods for monitoring.</li> <li>• <b>E2:</b> Responding to adverse effects.</li> </ul>

### 2.3.1 SA Approach

The SA process needs to be fully integrated into the planning system to ensure that conclusions from the appraisal inform planning decisions. In order to assist with this process, the ODPM guidance needs to be read in conjunction with The Planning and Compulsory Purchase Act 2004, the SEA Directive, the SEA Guidance 2005, the National Planning Policy Framework (NPPF) and the Localism Act 2011.

An Environmental Report may be included within a document covering effects other than those on the environment, for example as part of a Sustainability Appraisal. Where this is done, the document must clearly show that the Directive's requirements in relation to the Environmental Report have been met. Table 2-2 shows how these requirements have been met.

The following Section outlines the DCLG SA stages and tasks (see Table 2-3), indicates how the process was undertaken for the DMLD, identifies which previous report was issued for consultation and when, and identifies which section of this report provides the relevant evidence. This Section is structured with specific reference to DCLG guidance on SA and, where appropriate, references the SEA Directive.

The Statement of Consultation contains further details of the consultation process.

#### **DCLG Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.**

What the SEA Directive Says: the Environmental Report shall include information on [inter alia] the *“relationship [of the plan or programme] with other relevant plans and programmes” (Annex I(a)) “the environmental protection objectives, established at international, [European] 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” (Annex I (e))*

*“relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” and “the environmental characteristics of areas likely to be significantly affected” (Annex I (b), (c))*

*“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” (Annex I (d))*

*“The authorities ... which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes ... shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report” (Article 5.4 and 6.3).*

- A1: Identifying other relevant policies, plans and programmes, and sustainability objectives.

The relevant plans, programmes and environmental protection objectives and the significance of these objectives in respect of the DMLP and the SA are included in Appendix A of this report.

- A2: Collecting baseline information.

Baseline information is set out to establish the current state of the area covered by the DMLP, and to identify trends in economic, environmental and social parameters. This information is then used to assess current sustainability issues that are evident in the area. The baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of dealing with them.

A Scoping Report was initially produced in 2005 and as a matter of good practice and given the time since the initial SA Scoping Report was produced, a revised Scoping Report was issued in January 2011. The full baseline information is thus set out in the SA Scoping Report 2011v.

- A3: Identifying sustainability issues and problems.

Identifying the sustainability issues and problems is an opportunity to define the key social, environmental and economic issues which needed to be taken into account when preparing the DMLP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Key sustainability issues were also identified through researching the baseline information, taking account of the results of workshops, and through other means of correspondence.

Table 4-1 of this report summarises those key issues that the DMLP area currently faces in social, economic and environmental sustainability terms.

- A4: Developing the SA framework.

The SA Framework provides a method for describing, analysing and comparing the sustainability effects of plans and policies. The Sustainability Objectives that form the SA Framework were developed and consulted on as part of the SA Scoping process taking into account the relationship between the DMLP and the objectives of other plans and programmes, along with the findings of the baseline information review.

- A5: Consulting on the scope of the SA.

Views on the content of the SA Scoping Report 2005i and the Revised Scoping Report 2011v including the proposed approach to the appraisal, were taken into account through a formal statutory five (5) week consultation period with the statutory consultees including Natural England, English Heritage, and the Environment Agency. The SA Framework was refined through consultation at the scoping stage.

### **DCLG Stage B: Developing and refining options and assessing effects**

What the SEA Directive says: *“an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” (Article 5.1). Information to be provided in the Environmental Report includes “an outline of the reasons for selecting the alternatives dealt with” (Annex I (h)).*

*(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;*

In the UK, the term ‘options’ is often referred to instead of ‘alternatives’.

- B1: Testing the DMLP objectives against the SA framework.

It is important that the aims and objectives of the DMLP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested

for compatibility with the SA objectives to assist, where necessary, in refining the DPD aims and objectives as well as in identifying options/alternatives.

The DMLP objectives were tested against the SA Framework in the form of a compatibility matrix within the DM DPD Scoping Report 2011v; this concluded that the DMLP objectives are consistent with the sustainability appraisal objectives.

- B2: Developing and refining options and assessing effects.

DCLG Guidance states the following: “Only **reasonable, realistic and relevant alternatives** need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each. Some alternatives are discrete, involving a choice between one alternative and another. These are often the broad options considered early in plan and programme preparation. Other alternatives can be combined in various ways. Alternatives may be grouped into scenarios, for instance rapid economic growth, ‘most sustainable’ option, etc.” (Emphasis added).

- B3: Predicting the effects of the DPD and B4: Evaluating the effects of the DPD.

In developing the DMLP a series of options and alternatives were produced. Initial Issues and Options Reports were produced in 2005. Sustainability Appraisal of these issues and options was undertaken between January and August 2006 and is reported in Appendix B of the Preferred Options SA Report.

Following consultation on the Issues and Options Report (2005) a detailed range of policy options which reflected the comprehensive coverage of the issues and options identified by the DPD process was produced. The Preferred Options Report 2007 was produced along with a Sustainability Appraisal of these draft policies produced by LBL<sup>iv</sup>.

Section 4 of this report summarises the reasons for choosing the Preferred Options and the likely significant effects on the environment of the DPD including short, medium and long term-effects, permanent and temporary effects, and secondary, cumulative and synergistic effects.

The Preferred Options were chosen through a review of saved policies from the Lewisham Unitary Development Plan, a need to be in general conformity with the policies contained in the London Plan, a review of national planning requirements and the consultation responses received at the Issues and Options stage.

Section 5 appraises the policy options, including the ‘business as usual options’ for the DMLP.

- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.

Annex I of the SEA Directive requires the SEA Report to *include measures to prevent, reduce or offset any significant adverse effects on the environment of implementing the plan or programme*. For convenience, these measures are referred to in DCLG guidance as ‘mitigation measures’, however they include proactive avoidance of adverse effects as well as actions taken after effects are noticed.

Section 5 of this report includes the recommendations identified from the SA process and how these were addressed within the Plan.

- B6: Proposing measures to monitor the significant effects of implementing the DPDs.

What the Directive says: *“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action” (Article 10.1).”*

Section 6 of this report sets out a proposed list of monitoring activities currently being considered. Monitoring arrangements will be finalised following examination.

### **DCLG Stage C1: Reporting**

What the SEA Directive says... *“The environmental report shall include information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, [and] its stage in the decision-making process” (Article 5.2). Information to be provided in the Environmental Report includes:*

*“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. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects” (Annex I (f) and footnote)*

*“an outline of the reasons for selecting the alternatives dealt with” (Annex I (h))*

*“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” (Annex I (g))*

### **DCLG Stage D Pre- Examination**

- D1: Public participation on the further option of the DPD and the SA Report.
- D2(i): Appraising significant changes

## **2.4 Next Steps**

### **DCLG Stage D: Examination**

- D2 (ii): Appraising significant changes resulting from representations.

### **DCLG Stage D: Adoption and monitoring**

- D3: Making decisions and providing information.

### **DCLG Stage E: Monitoring the significant effects of implementing the DPD**

- E1: Finalising aims and methods for monitoring.
- E2: Responding to adverse effects.

## **2.5 Equalities Analysis Assessment**

An Equalities Analysis Assessment (EAA) will be prepared as part of draft DMLP following consultation on the Further Options document. An EAA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of a policy for different groups in the community. Local authorities have a duty under race, disability and gender legislation to carry out an EAA of their Local Plans. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EAA will highlight key issues needing further consideration and the recommendations will be used in the preparation of the draft policies.

## **2.6 The Habitat Regulations Assessment (HRA)**

A Habitats Regulations Assessment screening report will be prepared alongside the preparation of the Proposed Submission Version of the DMLP (or the draft plan). This will be done following the public consultation of the DMLP - Further Options. At this stage the likely significant effects of the draft policies can be properly assessed, in compliance with the Habitats Directive (92/43/EEC) and the Regulations.

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European sites to be assessed will be those located within a 15 kilometre radius of the borough boundary as they are considered to be in close enough proximity to potentially be impacted. The report will identify Richmond Park, Wimbledon Common and Epping Forest Special Areas of

Conservation and the Lee Valley Special Protection Area (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors will be presented. The report will provide details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a policy set out in the proposed submission DMLP, could have on the European sites. This includes in combination and cumulative effects.

FOR CONSULTATION

## 3 Background

### 3.1 Purpose of the SEA

The purpose of the SEA Directive is “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

### 3.2 Development Management Local Plan Context

The DPD was initially part of a combined Development Policies and Site Allocations DPD (2005). Since that time, a decision has been made to separate the two DPDs; one for site allocations and the other for development management policies.

The DMLP will set out the Council's planning policies for managing development in the London Borough of Lewisham and will be used to guide, assess and determine planning applications. The plan will support the implementation of the Lewisham Core Strategy and The London Plan and will need to be read alongside the Site Allocations Local Plan, the Lewisham Town Centre Local Plan, the Catford Town Centre Local Plan and any Council supplementary planning documents (SPDs).

The DMLP will provide further detail to the Core Strategy policies to support its implementation. The objectives of the DMLP are as follows.

1. To facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the Core Strategy's strategic objectives.
2. To facilitate development which protects and enhances the amenity of the local area.
3. To ensure a high standard of design.
4. To create safe, attractive, accessible and functional environments for all.
5. To secure development that helps create a more sustainable Lewisham.

The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development. The Council sees development management as a positive and proactive approach to shaping, considering, determining and delivering development proposals. The emphasis is on collaboration instead of negotiation; coming to a balanced agreement which solves problems rather than a compromise which doesn't meet everyone's objectives.

The process is led by the local planning authority (London Borough of Lewisham), working closely with those proposing developments and others particularly the local community. It is undertaken in the spirit of partnership and inclusiveness, and supports the delivery of key priorities and outcomes. The policies to be included

within the DMLP positively promote sustainable development and help implement the Core Strategy.

It is important to note that development management retains the established practice of proper consideration and transparent determination of planning applications and does not mean allowing unacceptable development.

Figure 3-1 shows the location of Lewisham in relation to the wider London area.

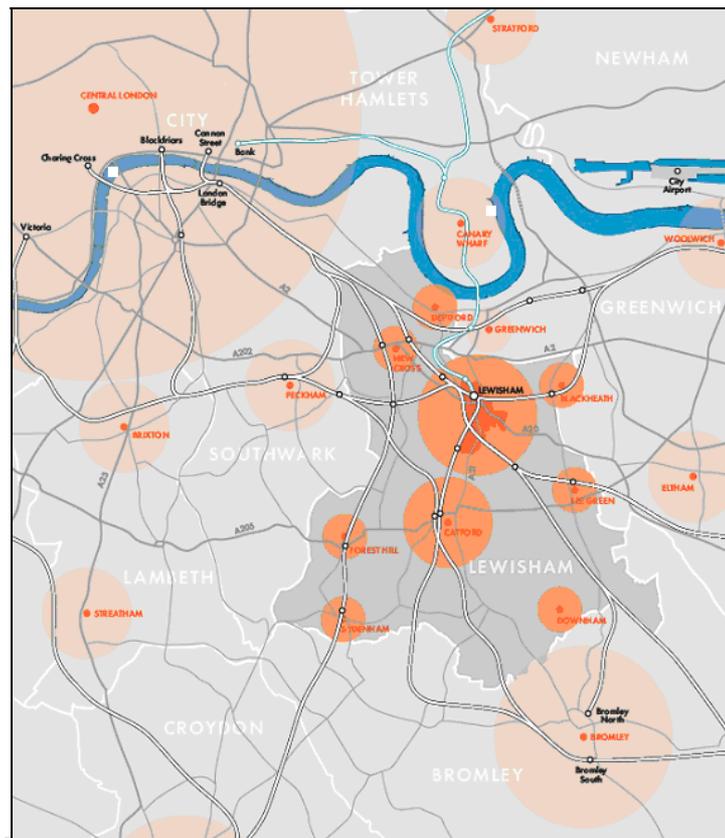


Figure 3-1 Lewisham in Context

### 3.3 Further Options

This further options stage is the third round of public consultation for the DMLP and follows on from the preferred options consultation in 2007. The further options stage is being undertaken in the consideration and context of:

- adoption of the Core Strategy in June 2011;
- preparation of a separate Site Allocations Local Plan rather than a combined plan with the development management policies (as was the case in 2007) The Site Allocations Local Plan was submitted to the Secretary of State for an independent Examination in Public on 28 September 2012;

- A review of the planning system by the Government and the publication of a National Planning Policy Framework (NPPF) The NPPF came into force on 28 March 2012 and replaces most national Planning Policy Statements (PPS) and Planning Policy Guidance (PPG); and
- Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This outlines the procedures for the preparation of a local plan, prior to its publication (the draft plan).

FOR CONSULTATION

## 4 Context, Baseline and SEA Objectives

### 4.1 Links to Other International, National, Regional, Local Plans and Programmes

This section summarises plans and programmes and related sustainability objectives established at other levels of the planning system that are relevant to the sustainability appraisal of the DMLP.

Sustainability Appraisals of Local Development Documents should take account of sustainability policies and objectives set at other levels of the planning system, e.g. in relation to Regional Spatial Strategies and national Planning Policy Statements (or Regional Planning Guidance and Planning Policy Guidance, which they replace respectively). National and international policy and objectives should also be considered where they are relevant.

The sections below show those policies reviewed in the context of the DMLP. Appendix A - Policies, Plans and Programmes of the SA Further Options Report provides further details on these explaining their relevance to the DMLP and the SA and how they have been considered during the SA process.

The relevant strategic and local plans and programmes and documents reviewed were:

#### 4.1.1 *International / European Policies, Plans and Programmes*

In most cases, International / European plans and programmes will not have an immediate or direct impact on the Local Plan. Rather, their objectives and requirements are reflected in lower-order plans and programmes, particularly at the National level and Regional level. The requirements of these plans and programmes (listed below) will filter down and indirectly influence the Local Plan:

- Kyoto Protocol to the UN Framework Convention on Climate Change (1997);
- The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) (2002);
- Convention concerning the Protection of the World Cultural and Natural Heritage (UNESCO) (1972);
- European spatial declaration on sustainable development Proponent body European Union (1999);
- European Spatial Development Perspective (ESDP) (1999);
- European Sustainable Development Strategy (2001);
- European Community Biodiversity Strategy (1998);

- European Directive on Ambient Air Quality Assessment and Management (96/62/EC);
- European Directive on Establishing a Scheme for Greenhouse Gas Allowance Trading (2003/87/EC);
- European Directive on Landfill (99/31/EC);
- European Waste Framework Directive (75/442/EEC, as amended in 1991);
- European Directive on the Conservation of natural habitats and of wild fauna and flora (The Habitats Directive 92/43/EEC);
- European Directive on Conservation of Wild Birds (79/409/EEC) (1979);
- European Directive 2000/14/EC (Noise);
- European Water Framework Directive (2000/60/EC);
- European Sixth Environmental Action Plan (2002);
- European Directive 2001/42/EC (SEA Directive);
- European Union Nitrates Directive (1991); and
- European Spatial Development Perspective (1999).

#### 4.1.2 *National Policies, Plans and Programmes*

The Department for Communities and Local Government determines national policies on different aspects of planning and the rules that govern the operation of the system. National planning policies are set out in the NPPF which was published in March 2012. This framework is a key part of government reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.

More broadly, a range of strategies are prepared by the Government for dealing with certain issues or problems, often as a result of international / European requirements. The Government also produces white papers on an ad-hoc basis, many of which have implications for planning.

It is a requirement that the Local Plan be consistent with the National Planning Policy Framework (2012) and with other plans and programmes which may be of relevance, including the following:

- Environmental Assessment of Plans and Programmes Regulations (Statutory Instrument 2004 No.1633).

- Planning and Compulsory Purchase Act (2004).
- Localism Act (2011).
- Town and Country Planning Act (1990).
- Planning and Energy Act (2008).
- Energy Act (2008).
- The Town and Country Planning (Use Classes) (Amendment) (England) Order 2010 (Statutory Instrument 2010 No.653).
- Climate Change Act (2008).
- Planning Policy Statement 10: Planning for Sustainable Waste Management (Department for Communities and Local Government) (2011).
- Community Infrastructure Levy: An overview (Department for Communities and Local Government) (2011).
- By Design: Urban Design in the Planning System – Towards Better Practice (Department for Communities and Local Government) (2000).
- Planning and access for disabled people: A good practice guide (Department for Communities and Local Government) (2003).
- National Air Quality Strategy 'Working together for clean air' (DEFRA) (2000).
- Homes for the future – more affordable, more sustainable (Department for Communities and Local Government) (2007).
- Energy White Paper 2003: Our energy, our future: creating a low carbon economy.
- Waste Strategy for England (DEFRA) (2007).
- Creating a better place strategy 2010-2015 (Environment Agency).
- Thames Catchment Flood Management Plan Summary Report – Managing Flood Risk (Environment Agency) (2009).
- TE2100 Flood Risk Management Plan (Environment Agency) (2012).
- Thames River Basin Management Plan (Environment Agency) (2009).
- Climate Change and the Historic Environment (English Heritage) (2007)

- Guidance on the Setting of Heritage Assets (English Heritage) (2011).
- Building in Context (English Heritage and CABE) (2007).
- Streets for All (English Heritage) (2006).

#### 4.1.3 *Regional*

It is a requirement that the LDF (within which the DMLP will sit) be in general conformity with the London Plan. This is to ensure that local planning policies and plans consider and advance the strategic policies of London as a whole.

The London Plan 2011 has been prepared by the Mayor of London. It sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031 and forms part of the development plan for Greater London. The London Plan acts as the overarching document for all of the Mayor of London's plans and programmes, including the following:

- The Mayor's Air Quality Strategy, Greater London Authority (GLA) (2010).
- The Mayor's Economic Development Strategy, GLA (2010).
- Connecting with London's Nature - The Mayor's Biodiversity Strategy, GLA (2002).
- Cultural Metropolis - The Mayor's Cultural Strategy 2012 and beyond (2010).
- The Draft Climate Change Adaptation Strategy for London, GLA (2010).
- The Mayor's Transport Strategy, GLA (2010).
- The Mayor's Draft Municipal Waste Management Strategy – London's Wasted Resource, GLA (2010).
- Sounder City: The Mayor's Ambient Noise Strategy, GLA (2004).
- London Housing Strategy, GLA (2010).
- London View Management Framework SPG, GLA (2011).
- Connecting Londoners with Trees and Woodlands - A Tree and Woodland Framework for London (2005).
- The London Rivers Action Plan - A tool to help restore rivers for people and nature (2009).

#### 4.1.4 *Local*

Local Plans and Programmes are the policies and strategies of the London Borough of Lewisham and other agencies operating in the local area. The existing Unitary Development Plan is included here. The DMLP will seek to ensure that any planning related needs arising from these plans and programmes are accommodated and advanced.

- Lewisham Core Strategy 2011 – 2026.
- Lewisham Unitary Development Plan 2004 (saved policies).
- Lewisham Sustainable Community Strategy 2008 – 2020.
- Community Safety Strategy Safer Lewisham Plan 2009-2010.
- Lewisham Regeneration Strategy 2008-2020.
- Healthier Communities – A health and well-being framework for Lewisham.
- Lewisham Borough Sports Plan 2010- 2013.
- Social Inclusion Strategy 2005- 2013.
- Local Biodiversity Action Plan – A Natural Renaissance for Lewisham 2006-2011.
- Lewisham Housing Strategy 2009 -2014.
- Better futures: Lewisham’s Homelessness Prevention Strategy 2009-2014.
- Lewisham Children and Young People’s Plan 2009-2012.
- Draft Lewisham Municipal Waste Strategy 2009/10.
- Lewisham Carbon Reduction and Climate Change Strategy (2008).
- Lewisham Local Air Quality Action Plan (2008).
- Fourth Round Updating and Screening Assessment For London Borough of Lewisham (2009).
- Lewisham Strategic Flood Risk Assessment (2008).
- Lewisham Flood Risk and Development Sequential Test (2009).
- Lewisham Local Implementation Plan 2011 – 2012.

- Lewisham Borough-wide Transport Assessment (2009).
- Deptford and New Cross Transport Infrastructure Study (2008).
- Lewisham Employment Land Study (2008).
- Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (2009).
- Lewisham Leisure and Open Space Study (2009).
- Lewisham Retail Capacity Study (2009).
- Lewisham Strategic Housing Market Assessment 2008 and the South East London Sub-regional (2009).
- Lewisham Infrastructure Delivery Plan (2010).
- South East London Boroughs' Waste Apportionment Paper (2010).
- Ravensbourne River Corridor Improvement Plan (2010).
- Lewisham Borough Wide Character Study (2010).
- Town Centre Health Checks (2009).
- Lewisham Conservation Area Management Plans (Various).
- Healthy Weight Healthy Lives (2009).

#### **4.2 Current and Predicted Future Social, Environmental and Economic Baseline Characteristics**

Baseline information is set out to establish the current state of the area covered by the DMLP, and to identify trends in economic, environmental and social parameters. This information is then used to assess current sustainability issues that are evident in the area.

The baseline information is intended to provide a basis for predicting and monitoring the effects of implementation of the plan. It also helps to identify sustainability issues and alternative ways of dealing with them. This information was reported in the SA Scoping Report July 2005i and was reviewed and updated for the SA Report 2011v.

Identifying the sustainability issues and problems is an opportunity to define the key social, environmental and economic issues which needed to be taken into account when preparing the DMLP. In some cases these are constraints which must be overcome, or impacts which must be avoided; in other cases these may be opportunities (e.g. stimulating the local economy and employment markets).

Table 4-1 highlights the key issues which were presented in the SA Scoping Report in November 2011.

Table 4-1 Key Sustainability Issues

Key Sustainability issues
<p><b>Economic</b></p>
<p><b>Local employment / training opportunities</b></p> <p><b>High commuter population working outside of Lewisham</b></p> <p><b>Fostering the borough's creative industries</b></p> <ul style="list-style-type: none"> <li>• There is a need to create and sustain employment and training opportunities in the borough to enhance the local economy. Opportunities need to be taken to support and retain local employment growth sectors.</li> <li>• The borough has recognised clusters of creative industries. There is a need to ensure employment areas and mixed use development provides suitable accommodation for this use.</li> </ul> <p><b>Provide and protect local shopping areas</b></p> <ul style="list-style-type: none"> <li>• Population growth will result in a need to enhance the vitality of local shopping areas, including markets, to reduce the need to travel outside the borough for goods and services.</li> </ul> <p><b>Finding a balance between meeting housing targets and maintaining economic and cultural vitality</b></p> <ul style="list-style-type: none"> <li>• A general conflict between meeting housing targets and protecting sites for other uses such as employment, retail, education, health, community in a built up environment.</li> </ul>
<p><b>Environmental</b></p>
<p><b>Protecting and improving biodiversity and natural habitats including local waterways</b></p> <ul style="list-style-type: none"> <li>• Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered declines.</li> <li>• The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</li> <li>• The continued protection and enhancement of the borough's 70 sites designated as Sites of Importance to Nature Conservation and 19 Local Nature Reserves.</li> </ul> <p><b>CO<sub>2</sub> emissions contributing to climate change</b></p> <ul style="list-style-type: none"> <li>• Climatic change due to greenhouse gas emissions are likely to affect the natural environment. The built environment will need to adapt to these changes and find ways of reducing carbon emissions. The domestic sector is the largest contributor to CO<sub>2</sub> emissions in Lewisham. The largest contributor to domestic emissions is space heating and cooling, which produce three times as many as either water heating or appliances and ten times as many as lighting.</li> </ul> <p><b>Climate change impacts</b></p> <ul style="list-style-type: none"> <li>• Climate change will have an impact on biodiversity, health, flooding, the historic environment, the urban environment such as heat island effect, increased surface water flooding and extreme weather conditions</li> </ul> <p><b>Climate change mitigation</b></p> <ul style="list-style-type: none"> <li>• CO<sub>2</sub> emissions can be reduced as part of a new development through improved energy efficiency, provision and promotion of renewable energy, improved water efficiency and less reliance on the private car.</li> </ul>

## Key Sustainability issues

### Climate change adaptation

- A range of adaptation measures will need to be adopted including SUDS, flood defence, green infrastructure, green walls/roofs and more sustainable transport etc.

### Traffic congestion and car dependence

- A growing population will place pressure on the road network and existing public transport. There is a need to locate development near existing transport links; improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking.

### High levels of air and noise pollution

- Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.

### Managing soil contamination and reducing the risk of land contamination

- An understanding of the solid and superficial geology is essential in order to determine whether potentially contaminated sites are likely to have an impact on controlled waters or adjacent sites. Land contamination from historical sources poses a particularly high risk to groundwater used for human consumption in the area of the lower Ravensbourne valley between Lewisham and Deptford. Criteria will be a necessary in the consideration of risk assessment processes applied to a site evaluation when development is proposed.

### Protect and provide opportunities to enhance local heritage assets (cultural, archaeological and historic) from redevelopment and recognise the beneficial contribution that the historic environment can make to an area

- Lewisham has 27 conservation areas and 357 designated heritage asset entries of which:
  - 323 are Grade II listed buildings (many of which represented groups of buildings)
  - 28 are Grade II\* listed buildings (many of which represented groups of buildings)
  - 2 are Grade I listed buildings (Boone's Chapel in Lee High Road and St Paul's Church in Deptford)
  - 3 are historic parks and gardens
  - 1 is a scheduled ancient monument
- The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development where appropriate. Social and economic benefits can arise from a well maintained and respected historic environment.

### Certain areas within Deptford New Cross and along the borough's river network are within Flood Zone 3a (high probability)

- Climate change is predicted to increase adverse weather patterns leading to more intense and severe flooding. There is a need to reduce and manage flood risk (including sewer flooding). Approximately 21,000 properties are at risk of flooding from tidal and river sources (16%) of all properties. Water and sewerage infrastructure may be necessary in flood risk areas.

### Low levels of recycling and the need to reduce total waste production

- There is a need to reduce waste generation and improve recycling and composting rates and manage our waste within the borough boundary.

Key Sustainability issues
<b>Social</b>
<p><b>High demand for housing, however affordability remains an issue as the population continues to grow</b></p> <ul style="list-style-type: none"> <li>There has been a decline in the proportion of detached and semi-detached houses and an increase in the number of single houses converted into flats. The London Mayor requires at least 11,050 new residential dwellings to be built in Lewisham by 2021. The average household income is insufficient to buy a house.</li> </ul> <p><b>Improved access to health care, education, community and cultural facilities</b></p> <ul style="list-style-type: none"> <li>Ensure health, education, community and cultural facilities are provided to accommodate the needs arising from new developments and meet existing needs. Loss of such facility needs to be assessed to determine appropriate replacement or re-provision.</li> </ul> <p><b>General perception of high crime</b></p> <ul style="list-style-type: none"> <li>Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment.</li> </ul> <p><b>Addressing deprivation, social exclusion and health inequalities</b></p> <ul style="list-style-type: none"> <li>Lewisham is the 31st most deprived local authority in England. Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot wards have the highest concentration of deprivation and are placed in the 10 per cent most deprived.</li> <li>There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</li> </ul> <p><b>Provision of, and access to, open space, community, cultural and recreational facilities</b></p> <ul style="list-style-type: none"> <li>Future growth in housing will result in a lower proportion of open space per 1,000 population. Opportunities to provide additional open spaces from potential developments and improve access to existing spaces, must be used to improve health and well-being.</li> <li>The provision of a range of community, cultural and recreational facilities needs to be monitored to ensure adequate provision and access.</li> </ul>

### 4.3 Sustainability Appraisal Objectives, Targets and Indicators

The SA objectives provide a method for describing, analysing and comparing the sustainability effects of plans and policies. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the DMLP and the objectives of other plans and programmes, along with the findings of the baseline information review.

The SA objectives were developed and consulted on as part of the SA Scoping process in 2005 and 2011.

These objectives formed the basis for the SA Framework within which the evaluation of different DMLP options and policies has been carried out; these are presented in Table 4-2 below.

The full list of SA objectives including targets and indicator sources is available in Appendix B.

Table 4-2 Sustainability Appraisal Objectives

Ref	Topic	Sustainability Appraisal Objectives
<b>Economic</b>		
1	Population, human health	To encourage sustained economic growth across a variety of sectors
2	Population, human health	To encourage and promote employment and new enterprises in Lewisham
<b>Environmental</b>		
3	Material assets	To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates
4	Climatic factors, water, air	To use and manage the consumption of natural resources in a sustainable manner
5	Biodiversity, flora and fauna, population, material assets	To protect and enhance the borough's open spaces
6	Biodiversity, flora and fauna, population	To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the borough
7	Air, population, human health	To improve air quality and reduce noise and vibration
8	Population, human health, air	To reduce car travel and improve accessibility by sustainable modes of transport
9	Climatic factors, water, air	To mitigate, and adapt to the impact of climate change
10	Climatic factors, water	To reduce and manage flood risk
11	Soil	To reduce land contamination and safeguard soil quality and quantity
12	Cultural heritage, material assets	To maintain and enhance landscapes and townscapes
13	Cultural heritage	To conserve and enhance heritage assets and use in the creation of sustainable places
<b>Social</b>		
14	Material assets, population, human health	To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home

Ref	Topic	Sustainability Appraisal Objectives
15	Population , human health	To improve the health and well-being of the population and reduce health inequalities
16	Population, human health	To address deprivation, promote social inclusion and ensure equitable outcomes for all communities
17	Population, human health, material assets	To provide for the improvement of education, skills and training
18	Population, human health	To enhance community safety by reducing crime, anti-social behaviour and the fear of crime
19	Population, human health, material assets	To improve accessibility to leisure and cultural facilities, community infrastructure and key local services

#### 4.3.1 Sustainability Appraisal of the DPD objectives

It is important that the aims and objectives of the DMLP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives (Table 4-4) to assist, where necessary, in refining the DPD aims and objectives as well as in identifying options.

The objectives of the DMLP as identified are:

- 1) To facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the Core Strategy's strategic objectives.
- 2) To facilitate development which protects and enhances the amenity of the local area.
- 3) To ensure a high standard of design.
- 4) To create safe, attractive, accessible and functional environments for all.
- 5) To secure development that helps create a more sustainable Lewisham and facilitates its positive impact on health and well-being.

Table 4-3 Key to Compatibility Assessment Matrix

Positive	✓	No direct relationship	•	Conflict	×	Uncertain	?
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Table 4-4 Compatibility Assessment Matrix

SA objectives	DMLP objectives				
	1	2	3	4	5
<b>Economic</b>					
1. To encourage sustained economic growth across a variety of sectors	✓	•	•	•	✓
2. To encourage and promote employment and new enterprises in Lewisham	✓	•	•	•	✓
<b>Environmental</b>					
3. To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates	✓	•	•	•	✓
4. To use and manage the consumption of natural resources in a sustainable manner	✓	✓	•	•	✓
5. To protect and enhance the borough's open spaces	✓	✓	✓	✓	✓
6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the borough	✓	✓	✓	✓	✓
7. To improve air quality and reduce noise and vibration	✓	✓	•	•	✓
8. To reduce car travel and improve accessibility by sustainable modes of transport	✓	•	•	✓	✓
9. To mitigate and adapt to the impact of climate change	✓	✓	•	•	✓
10. To reduce and manage flood risk	✓	✓	•	✓	✓
11. To reduce land contamination and safeguard soil quality and quantity	✓	✓	✓	✓	✓
12. To maintain and enhance landscapes and townscapes	✓	✓	✓	✓	✓
13. To conserve and enhance heritage assets and utilise the heritage environment in the creation of sustainable places	✓	✓	✓	✓	✓
<b>Social</b>					
14. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home	✓	•	•	•	✓

SA objectives	DMLP objectives				
	1	2	3	4	5
15. To improve the health and well-being of the population and reduce health inequalities	✓	•	•	•	✓
16. To address deprivation, promote social inclusion and ensure equitable outcomes for all communities	✓	•	•	✓	✓
17. To provide for the improvement of education, skills and training	✓	•	•	•	✓
18. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime	✓	✓	✓	✓	✓
19. To improve accessibility to leisure and cultural facilities, community infrastructure and key local services	✓	•	•	•	✓

The above compatibility assessment concludes that the DMLP objectives are consistent with the sustainability appraisal objectives.

## 5 DMLP Options and Alternatives

The following sections identify the issues and associated options that were considered during development of the DMLP.

### 5.1 Main Strategic Alternatives Considered and How They Were Identified

#### 5.1.1 *Options and Alternatives 2005/2006*

In developing the DMLP a series of options and alternatives were produced and a sustainability commentary on the proposed options was prepared to highlight potential conflict or issues and opportunities to strengthen the delivery of the sustainability objectives.

This SA Report should be read in conjunction with the Issues and Options Report (2005) and Appendix B of the Preferred Options SA Report (2007) prepared by Lewisham BC which discusses the issues and options in full details.

The results of the initial sustainability appraisal are presented in Appendix C of this Report.

### 5.2 Preferred Options

Following consultation on the Issues and Options Report (2005) and the initial Sustainability Appraisal, a detailed range of draft policies which reflected the comprehensive coverage of the issues, options and preferred options identified by the DPD process was produced. The DPD Preferred Options Report (2007) was accompanied by a Sustainability Appraisal of these draft policies produced by Lewisham BC. The assessment undertaken is contained within Appendix D of this Report.

#### 5.2.1 *Consultation on the SA of the Preferred Options*

Consultation on the Preferred Options was in accordance with Lewisham BC's Statement of Community Involvement (SCI). This included statutory and non-statutory organisations and over 1,500 residents, businesses and community groups. The statutory consultees included Natural England, the Environment Agency and English Heritage. Comments were received from Natural England, the Environment Agency and Brockley Cross Action Group.

*Table 5-1,*

Table 5-2, and Table 5-3 document the consultation responses received from each of these consultees and explain how the issues raised have been addressed.

Table 5-1 SA of the Preferred Options Consultation – Summary of responses received from the Environment Agency (10<sup>th</sup> August 2007)

Organisation	Environment Agency
Comment	Response
<p>We are concerned with the wording for objective 9 for the accompanying Sustainability Appraisals, which aims 'to mitigate flood risk'. Current national planning guidance in Planning Policy Statement (PPS) 25 calls for the reduction of flood risk. This can not always be achieved by mitigation measures. We would therefore advise that the objective be reworded accordingly. We have provided comments on the strategic objectives for the Core Strategy itself below.</p>	<p>The SA objective has been amended.</p>
<p>Flood risk is an integral part of spatial planning and should be taken into account not only at a site-specific level but also as part of the overall development framework. It is therefore imperative that the findings of the Strategic Flood Risk Assessment (SFRA) are incorporated into these documents and their accompanying Sustainability Appraisals at the submission stage. This is particularly crucial when allocating sites and land uses. SFRAs provide an appraisal of all types of flood risk to inform land use planning decisions. The SFRA will enable you to apply the sequential test, allocate appropriate sites for development, and identify opportunities for reducing flood risk.</p>	<p>The SFRA and other issues relating to flooding have been considered as part of the SA process (see SA Scoping Report 2011).</p>
<p>A number of additional comments were received from the Environment Agency under the following topic headings. These are included in detail within the Consultation Statement accompanying this report. None of these additional comments were relevant to the SA and no action was required. Hence they have not been included in detail here:</p>	<p>No action required, not relevant to the SA.</p>
<p>3.1 HOMES FOR ALL (HOUSING)            3.3 RETAIL AND TOWN CENTRES            3.4 OPEN SPACE AND BIODIVERSITY            3.4.3 Open Space Provision – Quality and Maintenance            3.4.4 Protection and Enhancement of Natural Habitats and Biodiversity            3.4.5 Protection and enhancement of Open Space Links and Corridors            Draft policy OS9            3.5.3 Flood Risk and SUDS            Draft policy SE4            3.5.4 Water            Draft policy SE6 Water Resources            Draft policy SE7 Sustainable Urban Drainage Systems (SUDS)            Draft policy SE9 Development on Contaminated Land</p>	

Organisation	Environment Agency
Comment	Response
3.5.11 Green roofs 3.6 URBAN DESIGN AND CONSERVATION U3 Development Sites – Trees, Landscape Planting and Nature Conservation 3.6.7 River Thames, Deptford Creek and the Ravensbourne River Network	

Table 5-2 SA of the Preferred Options Consultation – Summary of responses received from Brockley Cross Action Group (3<sup>rd</sup> August 2007)

Organisation	Brockley Cross Action Group
Comment	Response
Only one mention of Brockley in document: "42.8% of Lewisham households do not own a car, while 57.2% own one car or more. Wards in the north of the borough (Brockley, Evelyn, New Cross, Lewisham Central and Telegraph Hill) show higher rates of non car ownership than the rest of the borough, and are therefore more dependent on public transport provision". What is not mentioned is that Brockley ward are one of the highest users of car transport for the purposes of work in any ward in Inner London, which suggests that public transport is totally inadequate for the kind of community mix that exists in Brockley. There is no specific strategic fix mentioned to resolve this. It is exceptionally difficult to get from the west of the Borough to Lewisham Town Centre east west transport links are very poor.	This comment relates to the preparation of the plan itself rather than the SA. No action required.

Table 5-3 SA of the Preferred Options Consultation – Summary of responses received from Natural England (6<sup>th</sup> August 2007)

Organisation	Natural England
Comment	Response
<p><b>SA/SEA Preferred Options Report – Development Policies and Site Allocations</b></p> <p>Pages 2 and 3 of this document list the proposed Sustainability Appraisal Objectives, eighteen in total, grouped under the headings of Economic, Environmental and Social. All of the proposed Sustainability Appraisal Objectives can be broadly supported and in particular the following;</p> <p><u>Objective 5</u> “To maintain and enhance open space, biodiversity, flora and fauna”.</p> <p><u>Objective 7</u> “To reduce car travel and improve accessibility by sustainable modes of transport”</p> <p><u>Objective 10</u> “To maintain and enhance landscapes and townscapes”, this is supported where this relates to public/open/green spaces within the Borough, and not just built environment.</p> <p>The Council has recognised the issue and problem with respect to protecting and improving biodiversity and natural habitats within the Borough along with the issues and problems of open space and recreational facilities provision and this is welcomed and commended, pages 21 to 23 refer.</p> <p>The Policies, Plans and Programmes referred to in Appendix A are appropriate for this document.</p> <p>Proposed Monitoring Framework, Appendix D also seems appropriate and in line with other Borough approaches.</p> <p>However, in respect of Objective 5 “To maintain and enhance biodiversity, fauna and flora”, which also relates to open spaces within the Borough the Council may wish to give the following considerations for monitoring.</p> <p>The Number of Council owned Green/Open sites with an agreed management plan in place, the number of Parks achieving Green Flag status and the percentage that is fully accessible. These are quantifiable and measurable indicators which the Council can give consideration to. Objective 10 “To maintain and enhance landscapes”, the comments above under Objective 5 can also be used here.</p>	<p>Additional monitoring measures added in Table 6-1.</p>
<p><b>Appendix E – Appropriate Assessment</b></p> <p>Given that the nearest European site is approximately 15 kilometres away, the Council have felt it is not applicable to proceed to Stages 2 and 3 of the Appropriate Assessment and in this instance Natural England would agree with this approach.</p>	<p>No action required.</p>

### 5.3 DMLP Policy Options

#### 5.3.1 Significant environmental effects of the policies and proposals

The SEA Directive and related UK regulations require the SA to identify, describe and evaluate the likely significant effects on the environment of implementing the DPD.

The prediction of likely effects involves adopting an evidence based approach to:

- Identify the changes to the environmental baseline which are predicted to arise from the implementation of the DPD.
- Describe these changes in terms of their magnitude, geographical scale, time period over which they will occur, whether they are permanent or temporary, positive or negative, the level of probability of the effect eventuating and any secondary, cumulative and/or synergistic effects.

Predictions and evaluations may be both qualitative and / or quantitative but must be based on evidence. The SA expresses the likely predicted and evaluated effects of the DPD with a series of matrix tables using a scaled approach as shown below.

Table 5-4 Key Matrix Scores

Symbol	Meaning
++	Likely to have very positive impact
+	Likely to have positive impact
--	Likely to have very negative impact
-	Likely to have negative impact
	Depends upon implementation
0	Neutral impact identified
+/-	Positive and negative impacts identified
?	Unknown impact

#### 5.3.2 Assessment of the plan policy options

The DMLP policy options, presented in

Table 5-5, were assessed in terms of their impact against each objective in the Sustainability Appraisal Framework set out in Appendix B.

FOR CONSULTATION

Table 5-5 Development Management Policy Options

Topic & Policy Options
<b>Housing (Homes for All)</b>
1. Presumption in favour of sustainable development
2. Prevention of loss of existing housing
3. Conversion of residential dwellings and office space
4. Sheltered housing and care homes for older people
5. Homes in Multiple Occupation
6. Affordable Rent
7. Student Housing
<b>Employment Land</b>
8. Mixed Use Employment Locations
9. Local Employment Locations
10. Other Employment Locations
<b>Retail and town centres</b>
11. Town centre Vitality and Viability
12. Location of Main Town Centre Uses
13. District Centres Shopping Frontages
14. Neighbourhood and Local Centres
15. Local Shopping Parades and Corner Shops
16. Restaurants, Cafés (A3), and Drinking Establishments (A4)
17. Hot Food Take-away Shops (A5)
18. Shopfronts, Signs and Hoardings
19. Public Houses
20. Mini Cab or Taxi Offices
<b>Climate change and environmental management</b>
21. Sustainable Design and Construction
22. Air Quality
23. Open Space and Biodiversity
24. Landscaping and Trees

Topic & Policy Options
25. Noise and Vibration
26. Lighting
27. Contaminated Land
<b>Transport</b>
28. Car Parking
<b>Promoting good design</b>
29. Urban Design and Local Character
30. Alterations and extensions to existing buildings including residential extensions
31. Housing Design, Layout and Space Standards
32. Infill, Back-land, Back Garden and Amenity Area Development
33. Thames Policy Area and Deptford Creekside
34. Public Realm and Street Furniture
35. Listed Buildings, Conservation Areas and other Designated Heritage Assets
36. Non-designated heritage assets including Locally Listed Buildings, Areas of Special Local Character and Assets of Archaeological Interest
37. Demolition or substantial harm to designated and non-designated heritage assets
38. Domestic Satellite Dishes and other Telecommunications Equipment
39. Public Conveniences
<b>Community services</b>
40. Innovative Community facility provision
41. Nurseries and Childcare
42. Art, Culture and Entertainment Facilities
43. Places of Worship

The sections below summarise the appraisals of each policy option, including the business as usual option. The full appraisal matrices are set out in Appendix E.

### 5.3.3 *Option: Presumption in favour of sustainable development*

#### **DM Policy Option 1 – Presumption in favour of sustainable development**

1. *When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development*

*contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.*

2. *Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.*
3. *Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:*
  - a. *any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or*
  - b. *specific policies in that Framework indicate that development should be restricted.*

**Beneficial Impacts:** Population, Human Health,

The policy option promotes sustainable development and encourages development to occur in a manner consistent with the Lewisham Local Plan and the NPPF policies and intent. This will allow for sustainable development that may have beneficial outcomes such as improved health and wellbeing and social inclusion for the local population. Sustained economic growth across a variety of sectors may also lead to the promotion of local employment opportunities and new enterprises in Lewisham to the benefit of the local population.

**Adverse Impacts:** Material Assets, Biodiversity, Air Pollution, Human Health,

Sensible implementation of this policy option is important to ensure that the development occurs in a sustainable manner where policies are either out of date or not relevant. Without careful assessment, development may have the potential for adverse impacts on the local environment through increased waste generation locally, potential impacts on human health through air quality with increased construction and biodiversity through potential decreases in open/natural spaces.

Alternative

The policy option provides explicit reference to sustainable development, and no realistic alternatives are considered as the Government requires this policy to be included in a Local Plan as it reflects the NPPF presumption in favour of sustainable development.

5.3.4 *Option: Homes for all*

**DM Policy Option 2 - Prevention of loss of existing housing**

1. *The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use including change of use in the following circumstances:*
  - a. *the proposed redevelopment would result in housing gain which regenerate and replace older housing estates in line with an agreed plan or strategy*
  - b. *the land or premises are allocated for another use in an adopted Local Plan*
  - c. *a change of use to a local community service or facility is proposed that meets an identified need*
  - d. *an economic viability study confirms that the dwelling/s cannot be rehabilitated to a satisfactory standard at reasonable cost*
  - e. *evidence shows that environmental problems are such that demolition and redevelopment is the only effective option.*
  
2. *The reconversion of a former single dwelling house with multiple dwellings to a single dwelling may be acceptable in predominantly residential areas suitable for family occupation subject to amenity considerations and DM Options 29, 30, 31 and 32.*

**Beneficial Impacts:** Population, human health, cultural heritage, waste, landscape, material assets, biodiversity, natural resources.

The policy option seeks to prevent further loss of housing stock within Lewisham. which is likely to have long term positive effects on social cohesion and public health and well-being. There are also likely to be indirect long term positive effects as the townscape and cultural heritage assets are maintained (and possibly enhanced), and features important to biodiversity (such as old buildings for bats), are safeguarded.

**Adverse Impacts:** Population, water, air, climatic factors.

Land-use competition is likely to arise between the need for housing and requirement for other premises (such businesses and commercial enterprises). Protection of existing housing will make climate change and flood risk adaptation and mitigation more difficult, as retrofitting existing older buildings with sustainable design features may be expensive and problematic. Temporary adverse effects on air and noise quality during the construction phases were also identified.

### Alternative 1 - Reliance on the London Plan and Core Strategy:

London Plan Policy 3.14 addresses existing housing, however promotes the maintenance and enhancement of existing housing, directing the resistance of loss of housing to be incorporated into LDF preparation.

Core Strategy Policy 1 provides a clear and comprehensive policy on housing provision, mix and affordability. The key policy directions are:

- ensuring no net loss of housing and housing built to appropriate densities
- seeking 50 per cent affordable housing on sites capable of providing 10 or more dwellings, subject to financial viability
- provision of mixed tenure developments to provide market, intermediate (shared ownership) and affordable housing
- provision of family housing (3+ bedrooms), Lifetime Homes and wheelchair accessible housing
- ensuring a mix in dwelling types and sizes across all tenures.

However, Core Strategy Policy 1 does not address conversion of single residential houses to more than one dwelling, student housing, special needs housing (sheltered, older people etc), or affordable rent.

Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change, therefore this option depends upon implementation. There could be some temporary pollution nuisance during the construction phase.

### Alternative 2 - Excluding parts 1d and 1e from DM Option 2 which allows demolition / redevelopment / change of use for economic / environmental reasons:

There are similar positive and adverse effects as in DM Policy Option 2 in terms of waste, biodiversity, water, air and climatic factors. The positive effects identified for population and human health are however likely to be reduced / negated as a larger number of derelict / unused buildings (which cannot be redeveloped due to the 'retention of housing' policy option) are present in Lewisham. In the long term, this may also have adverse effects on the protection of the townscape and cultural / heritage assets, economic growth, crime and community safety if buildings are left unused.

### **DM Policy Option 3 – Conversion of residential dwellings and office space**

#### *Conversion of a single dwelling to two or more dwellings*

1. *The Council will not grant planning permission for the conversion of a single dwelling into flats other than in the following circumstances:*

- a. *physical situation, environmental conditions or lack of external amenity space means that the dwelling is not suitable for family occupation and the dwelling has a net internal floorspace greater than 130 sq.m. and*
- b. *any conversion permitted meets the general design requirements and housing standards in DM Option 24 (Landscaping and trees), DM Option 29 (Urban design and local character), DM Option 30 (Alterations and extensions to existing buildings including residential extensions) and DM Option 31 (Housing design, layout and space standards).*

*Conversions of office space and other commercial properties into flats*

2. *The Council will support the conversion of office space and other commercial properties into self contained flats in the following circumstances:*
  - a. *the proposal does not conflict with other policies in relation to employment floorspace and shopping frontages (DM Options 8, 9, 10, 11, 13, 14, 15)*
  - b. *the proposal meets the standards set out for residential development in DM Option 31 (Housing design, layout and space standards)*
  - c. *the proposal achieves a good living environment with adequate access, parking and safety standards, refuse storage and collection arrangements and*
  - d. *the conversion of a public house for residential use will need to meet the requirements of DM Option 19 (Public Houses).*

**Beneficial Impacts:** Population, Human health, Material assets

The aim of this policy option is to appropriately manage the future subdivision of family dwellings and commercial space into self contained flats. This will have positive effects on the population and human health through the promotion of sufficient housing of appropriate mix which will promote social inclusion and address inequalities through the opportunity to live in a decent home.

**Adverse Impacts:** Population, Human health, Material assets

With competition between different land uses within the borough likely, this policy may place extra pressure on retail space through it being allowed to be converted to residential use. Therefore careful implementation in the context of the wider DMLP will be necessary. There may also be minor negative effects on natural resources and waste generation through increased construction of new developments, however these are recognised as being temporary through construction only.

#### Alternative 1: Reliance on the London Plan and Core Strategy

The London Plan states that Londoners should have 'a genuine choice of homes that they can afford and which meet their requirements for difference sizes and types of dwellings in the highest quality environments.' The Core Strategy seeks to achieve mixed and balanced communities and preserve a choice of accommodation sizes in line with policies in the London Plan. However DM Policy Option 2 contains more specific guidance for conversions which incorporate stricter social and environmental controls and provides more certainty to developers than this alternative.

#### Alternative 2: The conversion of houses into flats will not be permitted where the net floorspace of a dwelling falls below 200/175/150 sq. m. as originally constructed.

This alternative would have similar impacts as for DM Policy Option 2, however with the difference of potentially increasing the buildings protected from conversion which may result in less of a mix of different residential properties, however is off-set by the enhanced beneficial impacts detailed above.

#### Alternative 3: Retain the UDP threshold (see saved UDP Policy HSG 9 (Conversion of residential property) for allowing conversions at a net floorspace of 130 sq.m as originally constructed.

This alternative would have similar impacts as for Alternative 2, however it would not necessarily reduce the conversion of larger family sized units which would have increased adverse impacts through impacting on the range and diversity of residential options across the borough.

#### Alternative 4: The conversion of houses in areas of the borough where there are a large number of family houses potentially available and/or where conversion of these would result in the number of flats in the area predominating over single family dwellings or an increase in the concentration of flats will not be permitted (known as Areas of Restraint).

This alternative would increase the number of buildings which would be available to be converted from family homes into flats. This may result in less of a mix of different residential properties, however is off-set by the enhanced beneficial impacts detailed above.

### **DM Policy Option 4 - Sheltered housing and care homes**

1. *The Council will support proposals for sheltered housing and care homes provided that the development:*
  - a. *will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and or care*



have adverse effects for cultural and heritage assets. Sensible implementation in both instances is therefore very important.

Alternative 1: Reliance on the London Plan and Core Strategy:

Positive sustainability impacts in terms of providing a range of housing across the borough and tackling social exclusion by meeting the housing needs of various groups; however the London Plan and the Core Strategy do not detail specific policy requirements for sheltered housing and care homes. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporary pollution nuisance during the construction phase.

Alternative 2: Locating sheltered housing and care homes anywhere rather than in easily accessible areas:

This alternative has similar positive and adverse effects to DM Policy Option 4 although access to community services is likely to be reduced, affecting accessibility, social cohesion and potentially health equality. This will have increased adverse impacts on the population and human health within the communities.

**DM Policy Option 5 - Homes in Multiple Occupation**

1. *The Council will consider the provision of new Houses in Multiple Occupation where they:*
  - a. *are located in an area with a public transport accessibility level (PTAL) of 3 or higher*
  - b. *do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood*
  - c. *do not result in the loss of existing larger housing suitable for family occupation*
  - d. *satisfy the housing space standards outlined in DM Option 31 and*
  - e. *satisfy the appropriate Environmental Health standards.*
2. *The Council will resist the loss of good quality Houses in Multiple Occupation.*
3. *The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.*
4. *All new HMOs are required to provide 10% wheelchair accessible rooms and must be fully fitted from occupation.*

**Beneficial Impacts:** Population, human health.

The policy option promotes affordable, good quality housing for young people and those on low incomes. This will have positive effects on equality and health and well-being. It promotes housing which makes provision wheelchair accessibility, the provision of which is likely to have long term positive effects on social cohesion and public health and well-being.

There may also be positive effects for social enterprise and employment as a solid base (a good home) for young and on lower incomes may facilitate greater employment and stability for new enterprise.

**Adverse Impacts:** Population, biodiversity, water, air, climatic factors, material, material assets, cultural heritage, landscape, waste.

The policy option does not make explicit reference to sustainable design principles and the provision of HMOs may therefore have adverse effects on the environment if not implemented in a sustainable manner, or in accordance with other relevant policies. The development of new HMOs may also alter the townscape and have adverse effects for cultural and heritage assets. Sensible implementation is important to ensure that HMOs do not adversely impact the surrounding amenity of a neighbourhood and are placed in areas with access to public transport and community facilities.

Alternative 1: Reliance on the London Plan and Core Strategy:

Positive sustainability impacts in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups; however the London Plan and the Core Strategy do not detail specific policy requirements for sheltered housing and care homes. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporary pollution nuisance during the construction phase.

Alternative 2: Restricting HMOs to certain locations such as town centres or those with a high PTAL

The alternative has similar positive and adverse effects to DM Policy Option 5 although access to services and community services is likely to be improved leading. Concentrating HMOs within certain areas may however intensify adverse effects relating to social cohesion and community health and well-being.

### **DM Policy Option 6 - Affordable Rent**

1. *The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.*
2. *If providing affordable rented housing:*
  - a. *the percentage of dwellings designated for this tenure shall be negotiated with the Council to ensure homes are genuinely affordable for households on low incomes,*
  - b. *rents should not exceed 'target rents', for dwellings of 3 bedrooms or more,*
  - c. *such dwellings are to remain at 'target rent' levels in perpetuity.*

**Beneficial Impacts:** Population, human health.

The policy option promotes affordable homes for those on low incomes and is likely to have positive effects for health equality and community well-being. New affordable/rented housing is also likely to have beneficial impacts on social cohesion and inclusion. It is also likely to be positive for social enterprise and employment as a solid base (a good home) for the young and those on lower incomes may facilitate greater employment and stability for new enterprise.

**Adverse Impacts:** Population, biodiversity, water, air, climatic factors, material, material assets, cultural heritage, landscape, waste.

The policy option does not however make explicit reference to sustainable design principles and the provision of affordable rented housing may have adverse effects or not contribute to the enhancement of biodiversity or climate change and flood-risk adaptation. New affordable/rented housing may also alter the townscape and have adverse effects for cultural and heritage assets. Implementation is important to ensure that these premises do not adversely impact the surrounding amenity of a neighbourhood and are placed in areas with access to public transport and community facilities.

**Alternative 1: Reliance on the London Plan and Core Strategy: The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.**

Positive sustainability impacts were identified in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups.. Housing provision may place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth.

Alternative 2: The Council does not prescribe target rent levels for any type of affordable rented housing and leaves this for the housing provider to determine.

This alternative has potential negative effects on health equality and community wellbeing as without target rent levels, there is likely to be lower provision of this type of development in Lewisham, negating the positive impacts identified for DM Policy Option 6.

### **DM Policy Option 7 - Student Housing**

1. *The Council will, support proposals for student housing provided that the development:*
  - a. *will not involve the loss of permanent self-contained homes*
  - b. *will not involve the loss of designated employment land*
  - c. *will not involve the loss of leisure or community space*
  - d. *will not prejudice the Council's ability to meet its annual London Plan housing target for additional self-contained homes*
  - e. *has an identified end user affiliated with an educational institution or student housing company*
  - f. *is well served by public transport and is accessible to a range of town centre, leisure and community services*
  - g. *provides a high quality living environment and includes a range of unit sizes and layouts, with and without shared facilities, to meet the requirements of the educational institutions it will serve*
  - h. *complies with all relevant national and local standards and codes including Accredited Network UK (ANUK) and any relevant standards for houses in multiple occupation (HMOs)*
  - i. *demonstrates that it is suitable for year round occupation and that it has long term adaptability and sustainability, including adequate and suitable cycle parking*
  - j. *contributes to creating a mixed and inclusive community and*
  - k. *does not cause harm to residential amenity or the surrounding area.*
2. *The Council will resist development that involves the net loss of student housing unless:*
  - a. *adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or*

- b. the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Lewisham or adjoining boroughs.*
3. *Where the Council is satisfied that a development involving the loss of student housing is justified, the replacement development is to provide an equivalent amount of residential floor space for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.*

**Beneficial Impacts:** Population, human health, water, climatic factors, waste, biodiversity.

The policy option seeks to provide sustainable, high quality housing for students without adversely impacting Lewisham's other residents and businesses. It promotes environmentally sustainable and affordable student housing, the provision of which is likely to have long term positive effects for students and encourage education and skills development.

The promotion of sustainable design is also likely to result in long term positive effects to climate change and flood risk adaptation and provide opportunities for biodiversity enhancements. The policy option considers access to education facilities which may beneficially minimise long term congestion and air quality impacts.

**Adverse Impacts:** Population, human health, cultural heritage, landscape,

Land-use competition is likely to arise between the need for student housing and requirement for commercial premises. The provision of new student housing may therefore adversely impact townscape and cultural heritage assets.

There is an element of nuisance / social disturbance that may be associated with students and the night time economy - sensible implementation will be needed to avoid adverse effects on neighbours and the well-being of the community. Temporary adverse effects on air and noise quality during the construction phases were also identified as possible adverse impacts.

Alternative 1: Relying on the London Plan and Core Strategy:

Positive sustainability impacts were identified in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups, however the London Plan and the Core Strategy do not detail specific policy requirements for student housing to the extent DM Policy Option 7 does. Housing provision may place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change

depend upon implementation. There could be some temporary pollution nuisance during the construction phase.

Alternative 2: Only locating student housing within town centres or near to public transport:

Similar positive and adverse effects to DM Policy Option 7 in terms of biodiversity, water, air, climatic factors, material assets, landscape, and waste. Town centres and areas near public transport are likely to be very high density and therefore this option may result in increasing environmental pressure on areas already under stress. Students will also be concentrated within certain areas which may lead to an intensification of the adverse social issues discussed above. This may lead to greater social exclusion and an adverse effect on community safety and well-being.

5.3.5 *Option Employment Land*

**DM Policy Option 8 – Mixed Use Employment Locations**

1. *The Council will require applications for changes of use of B Use Class floorspace to ensure that these sites continue to meet the Core Strategy aims for high density mixed use development that contributes to the local economy and provides a range of local employment opportunities. Core Strategy Policy 4 requires 20% of the built floorspace of mixed use developments on these sites to be in the B Use Class. Future changes of use should ensure that the proportion of B uses within the development does not fall below that which was originally granted permission in line with the aims of the Core Strategy.*
2. *New development or proposals for a change of use, should ensure that a variety of uses continues to be provided that take advantage of the location which is close to central London, to supply spaces in flexibly specified buildings that allow for the continued employment functioning of an area in line with Core Strategy Policy 4, for businesses in identified growth sectors such as business services, food and the creative industries.*
3. *New proposals will need to be provided with an internal fit out to an appropriate level to ensure the deliverability and long term sustainability of the employment uses on the site and be designed to ensure future flexibility of use by a range of businesses in the B Use Classes in line with Core Strategy Strategic Site Allocations 2, 3, 4, 5.*
4. *Proposals for changes of use of non residential floorspace to residential use will not be considered appropriate on MELs due to the need to ensure that the balance of uses on the site is retained.*

**Beneficial Impacts:** Population, Human health, Material assets

This policy option seeks to protect employment land and promote mixed-use and local business development within Lewisham and aims to encourage new buildings capable of attracting and accommodating a wide variety of new and established businesses on sites in industrial use. Through the improvements, there are positive effects on the population through encouraging sustained economic growth and promoting employment and enterprise in Lewisham. Promoting a range of mixed-use opportunities will likely have a positive impact on the local economy in Lewisham. This may also have indirect positive impacts through making the borough a nice place to live and work through improving the amenity and enhancing opportunities for residents.

**Adverse Impacts:** Population, Material assets

This policy applies restrictions on developers that may have an indirect (and temporary) negative effect on economic growth in the borough. However this will be off-set by the potential beneficial impacts through ensuring mixed use development in Lewisham is managed.

Alternative 1: Reliance on the London Plan and Core Strategy

DM Policy Option 8 is in accordance with the Lewisham Core Strategy, and therefore this alternative would have similar impacts as those listed above. However, DM Policy Option 8 is a lower tier policy with more detail and therefore may allow for greater clarity at implementation. London Plan Policy 4.3 provides strategic direction for mixed use development, however similarly does not provide the specific level of detail to ensure appropriate implementation in the context of Lewisham is achieved.

**DM Policy Option 9 – Local Employment Locations**

1. *The Council will consider uses within the B Use Class, within a Local Employment Location, subject to:*
  - a. *the use being appropriate in the location in relation to the surrounding built context,*
  - b. *the intensity of the use, and*
  - c. *the new use meeting the aims in the Core Strategy Policy 3.*
2. *Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses.*
3. *New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses.*

4. *Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.*

**Beneficial Impacts:** Population, Human Health, Air

The policy option seeks to protect employment land and promote mixed-use and local business development within Lewisham. It promotes the considered and balanced development of local employment locations which will encourage sustained economic growth across a variety of sectors in Lewisham. Promoting a range of local employment development will likely have a positive impact on the local economy in Lewisham. This may have benefits to the social inclusion and ensure equitable outcomes for the community. Considerations of intensity and flexibly specified spaces promote the minimisation of material use and encourage longevity of the development. This may also result in decreased pollution from reduced lifetime construction requirements.

**Adverse Impacts:** Population, Climate Change

Land use competition may arise between the need for employment land and residential or other community developments. Protection of existing employment developments will make climate change and flood risk adaptation/mitigation more difficult as retrofitting existing older buildings may be expensive and problematic.

Alternative 1: Relying on London Plan and Core Strategy.

The London Plan sets out in Policy 4.4 criteria whereby the boroughs stock of industrial land should be managed including 'the need to identify and protect locally significant industrial sites where justified by evidence of demand.' Local Employment Land as protected in DM Policy Option 9, represents good quality industrial land in short supply in Lewisham currently in active use. Therefore this Policy Option provides great detail at the implementation stage which may provide greater certainty for development.

Alternative 2: Allow free changes of use within the B Use Class within appropriate environmental parameters.

This alternative will likely have similar impacts as DM Policy Option 9, however this may have the additional adverse impact of allowing certain classes of use to predominate in local employment locations. This has the potential to limit the strategic mix of commercial uses which reduces the flexibility of use that smaller premises allow for.

## **DM Policy Option 10 – Other Employment Locations**

*Sites in Town Centres, District and Local Hubs and other clusters of commercial and/or retail uses*

1. *The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, District and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses and where the use is compatible with the surrounding built context by reason that they:
  - a. *Are well located in relation to the highway network*
  - b. *Are well located in relation to town centres and public transport*
  - c. *Offer the potential for the expansion of existing in-situ businesses*
  - d. *Offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area and*
  - e. *Provide lower cost industrial accommodation suitable for small, start-up businesses**
2. *Redevelopment of a site on a commercial street frontage will be supported when the site or building is redeveloped to a high standard of environmental and design quality in line with the other policies in this plan, and a business use is retained on the ground floor and a business and/or residential development on upper floors where an appropriate standard of amenity can be achieved. Uses not within the B Use class, such as retail or other uses appropriate to a town centre or district/local hub will be considered as part of a mix of uses where the number of jobs created by the proposal outweighs the loss of an employment site.*
3. *Where uses are proposed for a site or building in employment or retail use that propose that do not involve any job creation or retention, the Council will require evidence that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.*
4. *The change of use of the ground floor of a building in retail use to residential will be supported when the criteria in the retail policies in the plan are met.*

*Sites in residential areas*

5. *Applications for redevelopment for change to other business uses suitable for a residential area will be approved where:*

*a. The site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing or an alternative business use by reason of access difficulties or environmental incompatibility, and*

*b. that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.*

6. *A mix of uses in a new scheme will be considered positively subject to the context of the site and meeting the requirements of other policies in this plan, including, in the case of any residential development proposed as part of a scheme an appropriate level of amenity and the suitability of the site for this use.*

*All sites*

7. *The Council will seek contributions to training and/or local employment schemes where there is loss of local employment as a result of redevelopment or change of use.*
8. *New build business and retail premises should be provided with an internal fit out to an appropriate standard to attract new occupiers and ensure long term sustainable development.*

**Beneficial Impacts:** Population, Human Health, Material Assets, Air

This policy option seeks to protect employment land and promote mixed-use and local business development within Lewisham. It seeks to promote sustainable development in employment locations in the borough. Ensuring that employment related development is considerate of mixed use opportunities, employment generation in the local community and environmental impacts will likely produce a substantially beneficial outcome for Lewisham. It may contribute to sustained economic growth, promote employment and new enterprises, promote social inclusion and ensure equitable outcomes for the community.

Additionally, by specifically addressing sustainable environmental outcomes and transport accessibility, the pollution impacts of vehicle transportation, air quality and natural resource use are addressed for the borough.

The allocation for seeking contributions for education/training may also have benefits for improved education, training and skills for the population in Lewisham.

**Adverse Impacts:** Population, Material Assets, Climatic factors, Air

Enhancement, regeneration and new development of existing buildings will require resources for construction and operation of the buildings. Materials will need to be sourced and transported to the site and construction waste will be produced in the

process. These adverse impacts will however be short term. Implementation of appropriate sustainability considerations will need to be undertaken to ensure that growth in employment locations will not have adverse local impacts on resource use, climate change contribution and waste generation as this may have an adverse impact on the health and wellbeing of the local population.

Alternative 1: Reliance on London Plan and Core Strategy

This alternative has similar beneficial and adverse impacts as for DM Policy Option 10, however the comprehensive detail in this policy based on local information within the framework of the London Plan and Core Strategy policies should allow for greater certainty for developers in Lewisham which will assist in clarity in implementation.

Alternative 2: Grant planning permission for residential use on business sites and buildings in residential areas.

This alternative is likely to have similar impacts as per the DM Policy Option 10. However the granting of residential development on employment locations may result in a depletion of available land for commercial/business which impacts on economic growth and employment opportunities in Lewisham. Specifically it may lead to a greater reduction in the number of buildings/spaces which may meet the demand for good quality smaller premises for SME opportunities which would impact on the vitality and viability of the local economy. Additionally, it may result in a depletion of services in residential areas for the local population.

5.3.6 *Option: Retail and Town Centres*

**DM Policy Option 11 - Town Centre Vitality and Viability**

1. *Proposals within a designated town centre, as shown on the Policies Map, will be resisted unless the viability and vitality of the town centre is sustained and enhanced through the:*
  - a. *provision of a mix of uses to encourage a range of uses through the day and evening*
  - b. *incorporation of design principles such as active frontages at ground floor and effective street lighting with a view to making the town centre a safer place*
  - c. *provision of high quality shop fronts, in accordance with DM Option 18.*

**Beneficial Impacts:** Population, Human Health, Material assets.

Ensuring the vitality of the town centres through mixed land-use (business and residential) and the promotion of a high quality townscape is likely to have long term socio-economic benefits for Lewisham. A vibrant and attractive town will attract

business promote economic growth whilst also improving the safety and general wellbeing of the local community. There is also the opportunity for enhancements to the town centres to incorporate sustainable design features which contribute to climate change and flood risk adaptation. This is however very dependent on implementation.

**Adverse Impacts:** Water, Air, Climatic factors, Waste.

Enhancement and (in certain areas) regeneration of the townscape will require resources for construction, operation, and maintenance of the town centres. Materials will need to be sourced and transported to site and construction waste will be produced in the process. These adverse impacts will however be short term. Maintenance of a vibrant town centre is likely to require increased resource use (as more heat, energy, water, etc.) as more shops, bars, cafes, and retailers move into the area. Sustainability in both design and operation will be important so as to reduce the long term impacts of town centre growth, resource use and waste production.

#### Alternative 1: Reliance on the London Plan and Core Strategy:

The Sustainability Appraisal of Policy 6 of the Lewisham Core Strategy (which focuses on town centre development) states that the policy has:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

DM Policy Option 11 is a broad policy with overarching aims which are very similar to the Core Strategy Policy 6. The positive and adverse effects arising from each are therefore very similar; the key difference being that DM Policy Option 11 is a lower tier policy with slightly more detail and therefore may allow for greater clarity at implementation. As the London Plan policies provide high level strategic direction for town centre development than the Core Strategy, positive effects of DM Policy Option 11 are unlikely to be realised for Lewisham.

#### DM Policy Option 12 - Location of Main Town Centre Uses

- 1. The location of main town centre uses needs to be in accordance with Core Strategy Policy 6. For major retail development (over 1,000 square metres), if suitable sites are not available in the major and district centres then edge of centre sites should be considered, followed only then by out-of-centre sites in locations that are accessible by public transport, walking and cycling and are well connected to the town centre.*

2. *Proposals for retail provision of 1,000 square metres gross floor space or more on the edge or outside of the major and district centres will require an impact assessment and will only be considered if the following criteria are satisfied:*

- a. there is a quantitative and qualitative need for the proposal*
- b. there are no other sites available in accordance with the sequential test*
- c. the proposal, either by itself or together with other recently or committed developments, would not demonstrably harm the vitality and viability of an existing shopping centre*
- d. the proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres*
- e. the proposal is sited so as to reduce the number and length of car journeys and can serve not only car journeys but also those on foot, bicycle or public transport*
- f. the proposal is not on designated employment land as shown on the Proposals Map and for which a demand can be established and*
- g. if planning permission were to be granted then a planning obligation may be negotiated.*

**Beneficial Impacts:** Population, Human health, Material assets, Climatic factors.

The policy option promotes the locating of large scale retail developments within district centres, and places conditions on developments which seek to be located on the edge or outside of these areas. The policy is likely to promote economic growth within district centres and ensure that developments located outside of these areas do not detrimentally affect district centre economies. The policy requires developments to be accessible to all and is therefore likely to have long-term benefits for the local community. Improved accessibility via sustainable modes to retail centres may also have long term benefits for the environment

**Adverse Impacts:** Biodiversity, Water, Air, Landscape,

Construction of large scale retail developments, whether within or to the edge of district centres, is likely to result in increased resource use and production of waste. Depending on where these developments are situated and how they are designed, there may also be adverse effects for biodiversity and open spaces, and potentially the local townscape. Temporary adverse effects on air and noise quality during the construction phases were also identified.

Alternative 1: Relying on retail thresholds detailed in the NPPF:

The NPPF threshold for large scale retail developments is one and a half times greater than the threshold detailed in DM Policy Option 12. Relying on the NPPF

threshold may therefore result in reduced level of scrutiny for developments below 2500m<sup>2</sup> which, by Lewisham standards, are nonetheless of a significant scale. This reduced level of scrutiny (i.e. no requirement for an environmental assessment, not requiring PTAL level 4 etc.) may result in additional long term adverse impacts on the environment and potentially community wellbeing. Setting the threshold at 1000m<sup>2</sup> will ensure that all developments which are likely to have significant effects on Lewisham are considered through planning and impact assessment.

**Alternative 2: Reliance on the London Plan and Core Strategy:**

The Sustainability Appraisal of Policy 6 of the Lewisham Core Strategy (which focuses on town centre development and the retail development hierarchy) states that the policy has:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

DM Policy Option 12 is likely to present similar positive and adverse effects when compared to Core Strategy Policy 6 although DM Policy Option 12, being a lower tier policy with more detail, is likely to allow for greater clarity at implementation. . As the London Plan policies (including 4.7) provide high level strategic direction for town centre development than the Core Strategy, positive effects of DM Policy Option 12 are less likely to be realised for Lewisham.

**DM Policy Option 13 – District centres shopping frontages**

1. *Within the primary shopping frontages of the Blackheath, Deptford, Downham, Forest Hill, Lee Green and Sydenham district centres (as shown on the Proposals Map), the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:*

- a. *not harm the predominant retail character of the shopping frontage*
- b. *not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together and 70% of A1 uses maintained in the primary shopping frontage*
- c. *generate a significant number of pedestrian visits, thereby avoiding the creation of an area of relative inactivity in the shopping frontage*
- d. *occupy a vacant unit, having regard to both their number within the district centre as a whole and the primary frontage and the length of time the unit has been vacant*
- e. *not introduce a residential use at ground floor level, and*

- f. not result in adverse effects caused by crime, disorder and anti-social behaviour.*
- 2. Within the secondary shopping frontages of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Proposals Map) the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:*
- a. introduce an A2, A3, A4, A5 or D2 use*
  - b. not harm the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)*
  - c. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together*
  - d. not harm the retail character, attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units*
  - e. retain an appearance which is compatible with adjoining shop units including window presentation*
  - f. provide an active frontage at ground floor level*
  - g. not introduce residential uses at ground floor level.*
- 3. Outside the primary and secondary shopping frontages areas of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Proposals Map) the Council will consider applications for development or a change of use from a ground floor shop (Class A1) where the following are met:*
- a. the amenity of adjoining properties is not harmed*
  - b. the character, attractiveness, vitality and viability of the centre as a whole is not harmed*
  - c. in the case of a change to a residential use, the proposal would not result in a harmful break to the continuity of the retail frontage.*

**Beneficial Impacts:** Population, Human Health, Cultural Heritage, Material Assets,

This policy option promotes the location and preservation of retail and other commercial activities in district centres, and places conditions on any proposed change of use to maintain or enhance the townscape. The policy is likely to promote economic growth within district centres and may encourage and promote employment and enterprises in Lewisham. Through the consideration of the impacts on crime and anti-social behaviour and the amenity of the area, benefits to the local

population and human health may be realised with improved community safety, conservation of heritage assets and promote social inclusion.

**Adverse Impacts:** Population, Human Health, Climate Change

Through the focus on retail and other commercial spaces over residential development, this policy option may adversely impact on the creation of sufficient housing options in Lewisham. However when considered in the context of all other policy options, this policy in itself is considered to go sufficiently far to protect the amenity and character of district centres. Some minor negative impacts on climatic factors are potentially presented by this policy option through the requirement for residents to travel to district centres to visit the retail stores.

Alternative 1: Reliance on the London Plan and Core Strategy:

The Sustainability Appraisal of Policy 3 of the Lewisham Core Strategy (which focuses on district hubs) states that the policy has:

*“District Hubs will contribute to the protection of economic growth and employment as they protect core shopping areas for retail and employment purposes....positively impact on the general safety and the well-being of the population and will promote social inclusion.”*

DM Policy Option 13 is likely to present similar positive and adverse effects when compared to Core Strategy Policy 6 although DM Policy Option 13, being a lower tier policy more detail, is likely to allow for greater clarity at implementation. As the London Plan policies provide high level strategic direction for town centre development than the Core Strategy, positive effects of DM Policy Option 13 are less likely to be realised for Lewisham.

Alternative 2: Set the percentage of A1 uses in the primary shopping frontage at levels that are specific to individual centres based on the existing percentages.

The percentage of A1 uses in primary shopping frontages in the district centres ranges from 42% to 75% (Blackheath, 58%; Deptford, 75%; Downham, 75%; Forest Hill, 42%; Lee Green, 52%; Sydenham, 67%).

This alternative will have similar beneficial and adverse impacts as for DM Policy Option 13. However by setting targets for A1 development in different areas of the borough, this may have negative effects on economic growth within Lewisham and lead to inequalities in terms of accessibility and social inclusion across the borough.

Alternative 3: set the percentage of A1 uses in the secondary shopping frontage at levels that are specific to individual centres, based on the existing percentages.

The percentage of A1 uses in secondary frontages in the district centres ranges from 35% to 63% (Blackheath, 48%; Deptford, 42%; Downham, 63%; Forest Hill, 43%; Lee Green, 45%; New Cross & New Cross Gate, 35%; Sydenham, 51%).

This alternative is likely to have similar impacts as for alternative 2.

Alternative 4: Set a blanket percentage of A1 uses in the secondary shopping frontages at 50%.

The average percentage of A1 uses in secondary frontages in the district centres is 47%. By applying a target for development as opposed to the detailed criteria in the DM Policy Option 13, this would likely have negative effects on the population, human, health and material assets through the absence of assessment in the policy option against streetscape and amenity of the proposed development.

**DM Policy Option 14 - Neighbourhood and Local Centres**

1. *Within the designated neighbourhood local centres of Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, the Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.*
2. *A change of use to non-A1 uses will only be considered if the following criteria are satisfied:*
  - a. *a high standard of design and appropriate layout is achieved, including high quality shop fronts, in accordance with DM Option 18*
  - b. *provision of an attractive window display*
  - c. *reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent*
  - d. *the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)*
  - e. *a balance to the number and type of units within the parade (where 40% of A1 uses are maintained)*
  - f. *there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)*
  - g. *there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation*
  - h. *that adequate provision for access for people with disabilities is made*
  - i. *the use would not normally result in adverse effects caused by crime, disorder and anti-social behaviour.*
3. *A change of use to residential at ground floor will only be permitted at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage.*

**Beneficial Impacts:** Population, Human health, Climate change.

The policy supports retention of high quality Class A1 shops within neighbourhoods and local centres, and is likely to promote long term economic growth in Lewisham. The policy also ensures that any loss of A1 shops will not affect the amenity of neighbourhoods or reduce accessibility to the essential services they provide. The policy is therefore likely to have a long term positive effect on community wellbeing and reduce deprivation and lack of access to services. Retention of A1 shops within neighbourhoods is likely to reduce the need for local residents to travel and may therefore have a long term indirect positive effect on climate change adaptation.

**Adverse Impacts:** Waste, Human health.

Future developments which conform to DM Policy Option 14 are likely to produce construction waste and associated noise and vibration. This is likely to have short term adverse impacts on waste production and human health.

Alternative 1: Exclude 2(d) from the assessment criteria:

Removal of this requirement is likely to make A1 shops less accessible to parts of the community. As these shops usually stock essential daily goods, removing the requirement for other similar shops to be available to the community is likely to have adverse long term impacts on local wellbeing, increase deprivation, and potential increase car use and travel, which may have adverse impacts for the environment.

Alternative 2: Reliance on the London Plan and Core Strategy:

Taken from Lewisham Core Strategy Policy 6:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

While Core Strategy Policy 6 identifies the local neighbourhood to which DM Policy Option 14 applies, it is less detailed than DM Policy Option 14. It is therefore likely that reliance on the Core Strategy policy will result in confusion for both developers and the planning authority when A1 premises are concerned. This may have adverse socio-economic impacts for neighbourhoods and local communities. As the London Plan policies provide higher level strategic direction for town centre development than the Core Strategy, positive effects of DM Policy Option 14 are less likely to be realised for Lewisham.

### **DM Policy Option 15 - Local Shopping Parade and Corner Shops**

1. *The Council will seek to retain Class A1 shops located in a local shopping parade or operated as a corner shop in order to preserve or enhance the local character and support the provision of essential daily goods and services, unless an applicant can demonstrate:*
  - a. *the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)*
  - b. *a balance to the number and type of units within the parade*
  - c. *that reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent and*
  - d. *the replacement use will result in no harm to the amenity of adjoining properties.*
  
2. *A change of use to residential is located at the end of the row of a retail parade, but not in corner shops, in order to preserve the continuity of the retail frontage.*

**Beneficial Impacts:** Population, human health, material assets, climatic factors.

DM Policy Option 15 will result in similar positive socio-economic effects as DM Policy Option 14 as it promotes local business and accessibility to services for local communities. The policy options also protect the character and amenity of town centres and will have the indirect benefit of promoting climate change adaptation, as A1 shops are located within walking distance of local residents.

**Adverse Impacts:** Population, Human health, Waste.

Future developments which conform to DM Policy Option 15 are likely to produce construction waste and associated noise and vibration. This is likely to have short term adverse impacts on waste production and human health. There is the potential for land-use conflict with other businesses and housing.

Alternative 1: An additional criterion, expanding on 1(b), where various types of uses are restricted, for example proposals for hot food take-aways and betting shops will be resisted where they are in proximity (400 metres or less) to schools or sensitive community facilities.

Adding this extra criterion to DM Policy Option 15, may have additional positive effects on health and wellbeing and help address inequalities through restricting hot food take-aways near schools. However placing further restrictions on various types of development may adversely impact the local economy.

Alternative 2: Reliance on the London Plan and Core Strategy:

Taken from Lewisham Core Strategy Policy 6:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

While Core Strategy Policy 6 identifies the local neighbourhood to which DM Policy Option 15 applies, it is less detailed than DM Policy Option 15. It is therefore possible that reliance on the Core Strategy policy will result in confusion for both developers and the planning authority where A1 premises are concerned. This may have adverse socio-economic impacts for neighbourhoods and local communities. As the London Plan policies provide high level strategic direction for town centre development than the Core Strategy, positive effects of DM Policy Option 15 are less likely to be realised for Lewisham.

#### **DM Policy Option 16 - Restaurants, Cafes (A3), and Drinking Establishments (A4)**

1. *The Council will consider proposals for restaurants and cafés (A3) and drinking establishments (A4) where the following are met:*
  - a. *the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area*
  - b. *there is no harm to the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and un-neighbourly opening hours and*
  - c. *parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.*
  
2. *In addition applicants will be expected to provide acceptable arrangements for:*
  - a. *the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive*
  - b. *the collection, storage and disposal of bulk refuse and customer litter*
  - c. *sound proofing, especially if living accommodation is above or adjacent*
  - d. *the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00am to 11.00pm in neighbourhood local centres and local parades.*

#### **Beneficial Impacts: Population.**

The policy details conditions upon which applications for Class A3, and A4 will be approved. The policy promotes enterprise within Lewisham and is therefore likely to have a long term positive effect on employment and the local economy. The

conditions set out in the policy are likely to reduce adverse impacts commonly associated with these activities (noise, anti-social behaviour etc.) although implementation and monitoring will be critical to ensure these conditions are met.

**Adverse Impacts:** Population, Human health, Water, Air, Material assets, Waste

Although conditions set out in the policy option are designed to reduce the impact of these businesses on the environment and local community, given their very nature, it is nonetheless possible that some adverse impacts will arise. Cafes, restaurants and drinking establishments are high resource users and waste producers and their provision is therefore likely to have adverse effects in this regard. They are also generally often associated with noise and, at times, anti-social behaviour relating to the night-time economy. Care must be taken in the locating and provision of these facilities to ensure that they do not adversely affect the health, wellbeing, and safety of the local community.

Alternative 1: A new criteria 1(d) stating that the proposals for restaurants, cafes and drinking establishments in the town centres and local parades will not exceed 15% of the number of units in that centre/parade.

This alternative places further restrictions on development within Lewisham which may have negative effects on local economic growth. However restrictions on the number of units occupied by restaurants, cafes and drinking establishments may reduce the resource use and waste generation, and anti-social behaviour detailed for DM Policy Option 16.

Alternative 2: Reliance on the London Plan and Core Strategy:

Taken from Lewisham Core Strategy Policy 6:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

DM Policy Option 16 makes provision for A3 and A4 premises and places detailed requirements and conditions for their planning approval. Relying purely on the Core Strategy, while containing prescriptive policies for town centre development, is likely to offer less clarity at implementation for developers and the planning authority when compared to DM Policy Option 16. This may lead to inappropriate locating or provision of these businesses which could in turn have adverse socio economic and environmental impacts. The London Plan policies contain high level strategic direction for LDF preparation and as such will not provide the same level of detail for development in Lewisham as for DM Policy Option 16.

**DM Policy Option 17 Hot Food Take-away Shops (A5 Uses)**

1. *The Council will not grant planning permission for new hot food take-away shops (A5) that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).*
2. *The Council will only consider granting planning permission for new hot food take-away shops (A5) outside of the exclusion zone where:*
  - a. *the percentage of hot food take-aways (A5) in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10%*
  - b. *the number of hot food take-aways (A5) in Local Parades of nineteen units or less does not exceed one hot food take-away shop*
  - c. *the number of hot food take-aways (A5) in Local Parades of twenty or more units does not exceed two hot food take-away shops*
  - d. *the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area (in accordance with DM Option 18 - Shopfronts)*
  - e. *there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and*
  - f. *parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.*
3. *In addition, applicants will be expected to provide acceptable arrangements for:*
  - a. *the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive*
  - b. *the collection, storage and disposal of bulk refuse and customer litter*
  - c. *sound proofing, especially if living accommodation is above or adjacent and*
  - d. *the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00 am to 11.00 pm in neighbourhood local centres and local parades.*

**Beneficial Impacts:** Population, Human health,

The aim of this policy option is to manage the development of new hot food take-aways in Lewisham, with restrictions specifically relating to proximity to schools and their density in other retail areas. This is likely to have beneficial impacts on the local population in terms of human health and addressing health inequalities in the borough. Criteria aimed at managing the potential environmental impacts of A5 development also may have potential beneficial effects on the local population.

**Adverse Impacts:** Population, Human health

The restrictions within the policy option may impact on the promotion of new A5 enterprises within the borough, which may in turn have minor negative effects on economic growth within Lewisham. However this is likely to be off-set by the availability of space for other retail uses.

#### Alternative 1: Reliance on the London Plan and Core Strategy

The London Plan directs boroughs to promote the health and well-being of communities and identify and address significant health issues, for example by increasing access to healthy foods and developing local policies to address concerns over the development of fast food outlets close to schools.

Lewisham's Core Strategy promotes and supports local food growing and urban agriculture which is one way to increase access to healthy food, however the Council is also concerned about restricting access to unhealthy foods.

Neither of these documents contains policies that directly address the development of hot food take-away shops. Thus DM Policy Option 17 will provide much more specific guidance and certainty for their development for developers as compared to this alternative.

#### Alternative 2: Set the percentage of A5 uses in a shopping area to a blanket percentage of 10%, regardless of the type of centre/parade.

This alternative provides less of a restriction in development of hot food take-aways in the different types of shopping centres and parades in Lewisham. As the borough already has a significantly higher density of A5 uses and incidences of obesity, this alternative may lead to increased development of hot food take-aways leading to an increased negative impact on the health of the local population and subsequently health inequalities.

#### **DM Policy Option 18 – Shopfronts, Signs and Hoardings**

1. *Shop fronts should be designed to a high quality and reflect and improve the character and quality of their surroundings. This will be achieved by the following:*
  - a. *retention of high quality shop fronts both within and outside Conservation Areas. This would include retention of original fascia, pilasters and columns including where shop units are combined. Where retention is not possible replacements should use high quality materials and use a design appropriate to the period and character of the building*
  - b. *new shop fronts and the replacement of non-period shop fronts should use high quality materials, and use a design that relates well to the proportion, scale and detailing of the host building and makes a positive contribution to the streetscape. Where possible existing original pilasters,*

*brackets and fascia should be retained and the new shopfronts should relate well to these features.*

- c. new shop signs should relate successfully to the architectural features and detailing of the building. Architectural features such as cornices, pilasters and columns should not be obscured*
- d. provision of separate access to any residential accommodation on other floors, an encourage the restoration of such access if already removed*
- e. provision of suitable access for people with disabilities in new shop fronts*
- f. provision of storage for refuse bins where possible*
- g. refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and character of an area*
- h. roller grilles and shutters for security purposes should be of an open mesh variety leaving the shop window visible, with the box for any grille or shutter contained behind the fascia where possible*
- i. within Conservation Areas and residential areas, internally illuminated box signs and projecting signs will not be permitted unless they are successfully related to the design and detailing of the building and positively contribute to the special character of a group of buildings or the street.*

*2. The Council will not grant planning permission for the display of poster hoardings which are considered to be out of scale and character with the building/site on which they are displayed. Temporary hoardings may be suitable for some form of public art.*

**Beneficial Impacts:** Population, Material assets, Cultural heritage.

The policy option sets out conditions and requirements for shop-fronts within Lewisham's town centres. It is likely to improve the aesthetic appeal of these centres, with indirect long term positive effects for the economy and for the general wellbeing for local residents. The townscape and cultural heritage assets are also likely to receive long term positive effects as sensitive design measures are incorporated into shop front design.

**Adverse Impacts:** Waste, Material assets, Climatic factors.

Enhancement and maintenance of shop frontages in line with DM Policy Option 18 is likely to require construction works and use of various types of materials. This is likely to have short term adverse effects on waste production and resource use. Appropriate materials will need to be sourced and transported to sites with potential short term adverse consequences for air quality and fossil fuel use. There are also likely to be short term increases in construction related noise and disturbance.

### Alternative 1: Reliance on the London Plan and Core Strategy:

Taken from Lewisham Core Strategy Policy 6:

*“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”*

There is limited policy detail with regard to shop frontage design, in the Core Strategy. Without DM Policy Option 18, direct adverse impacts may arise as shop frontages may detract from the townscape (without appropriate guidance) with further indirect socio-economic impacts for Lewisham. The London Plan does not provide any significantly relevant policies that relate directly to shop fronts and hoardings therefore DM Policy Option 18 provides specific detail to manage this development in Lewisham.

### **DM Policy Option 19 Public Houses**

1. *The Council will only permit the change of use or redevelopment of a public house (A4) after an assessment of the following:*

- a. *a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including the length of time the public house has been vacant, evidenced by the applicant of active and appropriate marketing for a constant period of at least 36 months at the existing use value*
- b. *the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision, including evidence that the premises have been offered to use or to hire at a reasonable charge to community or voluntary organisations over a 12 month period and there is no longer a demand for such use*
- c. *the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance*
- d. *the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.*

2. *Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a*

*significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained, and for the ground floor to remain in use for a range of non-residential uses, including D1, as appropriate.*

3. *The proposed change of use of a public house for residential use will only be acceptable where:*
- a. *the proposal has been assessed against parts 1c and 1d of this policy option and the impact of the proposal on these features and*
  - b. *where the Council is satisfied that residential use is acceptable, the accommodation to be provided is of the highest quality and meet the requirements outlined in DM Policy Option 31 (Housing design, layout and space standards).*

**Beneficial Impacts:** Population, Human Health, Cultural heritage, Material assets

This policy option encourages the protection of the space and function that public houses provide to the community. There may be minor positive impacts on population and human health through the access to community infrastructure and feelings of social inclusions that such facilities may provide. Additionally there may be minor positive impacts realised through the maintenance and enhancement of local townscapes and the promotion of employment opportunities in Lewisham.

**Adverse Impacts:** Population, Human health

The policy option presents restrictions and conditions for developers, and may increase the cost of development leading to adverse effects on the local economy.

Allowing public houses to be changed to residential use may lead to the loss of opportunities for economic growth in Lewisham, however this is mitigated through the restrictive criteria identified in this policy option.

#### Alternative 1: Reducing the 36 month time period specified in 1a. to 24 months

This alternative is likely to have similar impacts as per DM Policy Option 19 above, however with the shorter timeframe for proving economic non-viability of the facility as a public house, may not account for changes within the wider market place that the extra 12 months may capture. It would however, provide reduced financial pressures on developers and potentially allow for vacant public houses to be redeveloped within shorter timeframes.

#### Alternative 2: Not requiring a viability report to justify the loss of a public house

This alternative is likely to have similar impacts to Alternative 1, however by removing part 1a of the policy option, there is an added minor negative impact

through the potential greater loss of public houses to other use. This would negatively impact the local population due to the role that public houses have as community spaces.

Alternative 3: Not requiring a building to be retained if loss of the A4 use is deemed acceptable

Through not protecting the potential heritage assets that public houses may be, additional negative impacts associated with loss of these buildings and the impact that may have on the townscape/streetscape, and the impacts on air, water, waste and natural resources through increased new build work in Lewisham may be realised.

Alternative 4: Reliance on the London Plan and Core Strategy:

There is limited policy detail with specific regard to public houses in either the London Plan or Core Strategy. Without DM Policy Option 19, direct adverse impacts may arise as public houses are converted to other uses within Lewisham (without appropriate guidance) with further indirect socio-economic impacts for Lewisham.

**DM Policy Option 20 Mini Cab or Taxi Offices**

1. *The Council will grant planning permission for mini cab or taxi businesses only in locations where they:*
  - a. *would not cause any adverse impact on the surrounding area by virtue of traffic congestion, including parking, which would be of detriment to the safety of other vehicle users, pedestrians and cyclists*
  - b. *are well lit and have good CCTV facilities; and*
  - c. *would not have a detrimental effect on the amenities of adjoining property, especially residential occupiers, including that caused by noise disturbance.*

**Beneficial Impacts:** Population, Human Health,

This policy option promotes the safe and inclusive operation of mini-cab / taxi offices in the Lewisham community. Through encouraging consideration of traffic congestion, safety and potential nuisance factors, this policy option has minor positive effects on the local population through enhancing community safety, health and well-being as well as maintaining the townscape aesthetic. There may be minor positive effects from the encouragement of new enterprises in Lewisham which may have positive effects on employment.

**Adverse Impacts:** Population, Human health and Air.

Minor negative effects as a result of this policy include the impacts associated with increased car travel on air, climate change, etc.

#### Alternative 1: Reliance on the London Plan and Core Strategy

DM Policy Option 20 provides clear direction for the development of mini cab/taxi offices in Lewisham, guidance which is not explicitly provided by the London Plan or Core Strategy policies for this type of development in the borough. This provides greater certainty in the implementation for developers.

#### 5.3.7 *Option: Climate Change and Environmental Management*

##### **DM Policy Option 21 - Sustainable Design and Construction**

1. *The Council will require all developments to maximise the incorporation of passive design measures to manage heat gain and deliver passive cooling using the following hierarchy:*
  - a. *passive solar design to optimise energy gain and reduce the need for heating,*
  - b. *passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat,*
  - c. *mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical cooling followed by air conditioning, and*
  - d. *full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.*
2. *For conversions to residential from other uses, the Council will require cost effective and proportional energy efficiency measures to be carried out where feasible to a value not exceeding 10% of the overall construction costs.*
3. *For minor residential extensions, the Council will seek to deliver the highest BREEAM standard provision possible for the new part and will encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.*
4. *For non-residential extensions and conversions, the Council will seek to deliver the highest BREEAM standard provision possible for both the new and existing parts of the development. Evidence will be required to justify the standard proposed.*
5. *In relation to Core Strategy Policy 8 bullet 4, where industrial (B2 and B8) uses cannot achieve a minimum of BREEAM 'Excellent' standard, the Council will*

*ensure that a minimum of 'Very Good' is achieved, scoring the maximum BREEAM points possible.*

**Beneficial Impacts:** Population, Human health, Waste, Water, Air, Climatic factors, Material assets, Biodiversity, Natural resources.

The policy option promotes the incorporation of sustainable design into conversions, refurbishments and change of use developments within Lewisham. Implementation of the policy option is likely to have long term positive effects for the environment, with sustainable design and the adoption of BREEAM standards in construction promoting (both directly and indirectly) energy efficiency, waste reduction, climate change and flood risk adaptation, and biodiversity enhancement. Environmental improvements are likely to have indirect positive effects for human health and social cohesion within the community, which are likely to lead to potential economic benefits in the long term as Lewisham becomes a more desirable place to live and work.

**Adverse Impacts:** Population, Cultural heritage.

The policy option imposes certain restrictions/conditions on developers, and this may have short term adverse effects on development and economic growth. Incorporation of sustainable design principles into historical assets may be difficult, and conflicts may therefore arise.

Alternative 1: Relying on Building Regulations, the London Plan, London Plan Sustainable design and construction SPG (2006) and the Mayor's Climate Change Mitigation and Energy Strategy (2011):

Policy Option 21 provides more detailed implementation guidance of Core Strategy Policies 7 and 8, which deliver the approach in the London Plan policies 5.2, 5.3 5.9 which are supported by the London Plan SPG: Sustainable Design and Construction, 2006. The Policy Option is more detailed and prescriptive than this alternative and is therefore likely to be clearer for developers and interested parties to follow in order to deliver the beneficial and adverse impacts detailed above.

Alternative 2: For Part 3 of the Policy Option, do not encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.

Alternative 2 is likely to result in similar positive effects as DM Policy Option 21, as most of the Policy Option would remain the same. However with the removal of the requirement for developments to meet with greater energy efficiency and enhancement benefits promoted through sustainable design of residential and non-residential developments. Potential adverse effects are also evident for development and the economy, as the requirement to adhere to sustainable design principles imposes greater controls/restrictions on developers.

This policy does not promote innovation or detail the type of measures and standards required to promote sustainable design, beyond current buildings regulations.

### **DM Policy Option 22 - Air Quality**

- 1. The Council will only grant planning permission for developments that have the potential to impact on air quality to submit an Air Quality Impact Assessment (AQIA) considering the potential impacts of pollution from individual and cumulative development on the site and on neighbouring areas and detailing any appropriate mitigation measures that would reduce exposure to acceptable levels.*
- 2. Applications for planning permission for all new development proposals that have the potential to impact on air quality in an Air Quality Management Area (AQMA) will not be permitted to include a biomass boiler.*

**Beneficial Impacts:** Population, Human health, Air, Climatic factors, Material assets, Landscape, Cultural heritage, Biodiversity.

The policy option seeks to improve air quality within Lewisham by limiting development types which may exacerbate the problem. Air quality improvements are likely to have long term benefits for the environment and human health and wellbeing. There are also likely to be long term indirect positive impacts as environmental and social benefits make Lewisham a better place to live and work.

**Adverse Impacts:** Population, Material assets, Climatic factors.

Conflicts with economic development and natural resource use may arise due to the restrictions and controls imposed by the policy option. Certain developments which could provide employment and encourage enterprise may not be feasible if they conflict with standards for the AQMA. Furthermore, restricting the use of biomass boilers may increase the use of more carbon intensive types of fuel, leading to increased non-renewable resource use.

### **Alternative 1: Reliance on the London Plan and Core Strategy:**

The Core Strategy and DM Policy Option 22 promote the same goal - improving air quality within the borough and consequently will have similar positive effects for the environment and community health and wellbeing. However, Alternative 1 is less prescriptive than DM Policy Option 22 and therefore may have reduced negative effects on the economy, but will also have reduced positive impacts on the environment and human health and well being.

London Plan policy 7.14 has criteria to guide development to have low impact on air quality and address air pollution which would have positive effects on the local population and environment, health and well-being for the region. However the

requirement for AQIA for development in Lewisham may lead to slight strengthening of these benefits on local air quality in the borough.

### **DM Policy Option 23 - Open Space and Biodiversity**

1. *The Council will require all new development to:*

  - a. *take full account of appropriate Lewisham and London Biodiversity Action Plans in development design and ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity.*
  - b. *use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Institute of Ecology and Environmental Management [IEEM]. The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value.*

2. *New living roofs are required to be designed and fitted by a qualified and accredited installer and include an extensive substrate base, except where it can be demonstrated that such a base is not feasible and achievable. Developers are required to provide a Living Roofs Management and Maintenance Plan for the first 5 years to demonstrate the ecological impact of the living roof and how it will be monitored and maintained.*
3. *Artificial grass sport pitches are required to be delivered on hard surfaces and previously developed land rather than on existing natural grass, wherever feasible. Applicants should give consideration to the potential loss of open space, the effect on drainage and surface water flooding and the impact of the pitch, lighting and use on the amenity of the adjacent areas.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Soil, Water, Air, Climatic factors, Landscape.

The policy option promotes biodiversity and quality open spaces within Lewisham and is likely to have long term positive effects for the environment. The enhancement of biodiversity will assist in mitigating and adapting to climate change, and reducing resource use. Improved open spaces will also positively affect community health and wellbeing and social cohesion in the long term and may have indirect benefits for the local economy as Lewisham is viewed as an attractive place to live and work.

**Adverse Impacts:** Population.

The policy option presents restrictions and conditions for developers, and therefore may increase the cost of development leading to adverse effects for the local economy.

Alternative 1: Reliance on the London Plan and Core Strategy:

From the Sustainability Appraisal of Core Strategy Policy 12:

*“Positive sustainability impacts, particularly in terms of protecting existing habitats and contributing to biodiversity. This policy would also help to promote healthy communities by retaining space for leisure pursuits which would also help to facilitate social cohesion and improve air quality.”*

DM Policy Option 24 provides greater detail for the protection and promotion of open spaces and biodiversity within Lewisham, than relying on the London Plan and Core Strategy alone. Whilst the London Plan and Core Strategy will need to be addressed in all planning application, the further detail specific to the borough that DM Policy Option 24 provides will allow for greater certainty for developers on implementation locally.

**DM Policy Option 24 - Landscaping and Trees**

1. *Applicants for all major development and, where appropriate, non-major development will be required to submit a Landscape Scheme, proportionate to the size of the development, containing:*
  - a. *a Landscape Plan for areas not occupied by buildings that takes note of the relevant site features and indicates those that are to be retained, including trees and the presence of any species of nature conservation interest,*
  - b. *details of all enabling work required to ensure the implementation of the Landscape Plan,*
  - c. *an enforceable 5 year Landscape Management Plan detailing the provision, management and maintenance of quality hard and soft landscapes and trees.*
2. *Applicants for all major development and, where appropriate, non-major development (and always when there is a Tree Preservation Order in place) will be required to:*
  - a. *submit an Arboricultural Survey carried out by an appropriate, competent person, in line with BS5837.*
  - b. *retain existing trees for the most part and in the event of tree removal, replacement planting will normally be required. New and replacement tree planting must use an appropriate species that reflects the existing biodiversity in the borough.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Soil, Water, Air, Climatic factors, Landscape.

The policy option promotes retention of trees, tree planting and enhancement of the Lewisham landscape. This is likely to have long term positive effects for the environment within Lewisham, and make Lewisham a more desirable place to live. This is likely to have indirect long-term positive effects on human health and well-being. Additionally, there is an indirect minor positive effect on climate change adaptation through the positive environmental impact increased vegetation may have on air quality more broadly.

**Adverse Impacts:** Population, Water

The policy option presents restrictions and conditions for developers, and therefore may increase the cost of development leading to adverse effects on the local economic growth. Additional trees within Lewisham will require excess water which will increase use of this resource.

There may be issues associated with the planting of trees due to the cable and pipe lines under the street surfaces.

Alternative 1: Reliance on the London Plan and Core Strategy, the GLA's Trees and Woodland Strategies SPG (Draft April 2012), the Mayor's Biodiversity Strategy – Connecting with Nature (2002), Lewisham Biodiversity Action Plan and Lewisham Tree Strategy.

Relying on these strategies are likely to promote similar positive and negative effects as for DM Policy Option 24. However, Alternative 1 relies on a large volume of other information and documents. This may make implementation of the alternative cumbersome as well as difficult to monitor for developers and the Council. It may also discourage developers and frustrate the promotion of enhanced landscapes and retention of trees within Lewisham.

### **DM Policy Option 25 - Noise and Vibration**

1. *The Council will require:*

- a. *noise and/or vibration generating development or equipment to be located in the Strategic Industrial Locations and Local Employment Locations as shown on the Local Plan Policies Map,*
- b. *new noise sensitive developments are to be located away from existing or planned sources of noise pollution, except if it can be demonstrated through design or mitigation that:*
  - i. *internal and external noise levels can be satisfactorily controlled and managed by the noise sensitive development; and*

- ii. *there will be no adverse impact on the continued operation of any existing or proposed business or operation.*
  - c. *a Noise and Vibration Assessment for noise and/or vibration generating development or equipment and new noise sensitive development, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken.*
2. *The Council will designate, safeguard, protect and enhance tranquil open space by refusing planning permission for development that will affect a tranquil area, as identified in Table 2.1, by increasing the predicted traffic noise levels over 55 dB Leq (day), unless noise screening, barriers and natural sound features mitigate and offset the impact.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Material assets, Cultural heritage

The policy option seeks to reduce the impact of noise and vibration within the borough. This is likely to have long term positive effects on the Lewisham local environment, not only for people and their health and well-being, but also for biodiversity such as birds and bats which favour low levels of disturbance. Reduced levels of noise and vibration will improve Lewisham's liveability which may have long term economic and employment benefits for the borough.

**Adverse Impacts:** Population.

The policy option presents restrictions and conditions for developers, and therefore may increase the cost of development leading to adverse effects on the local economy.

Alternative 1: Reliance on the London Plan and Core Strategy, the Mayor's Ambient Noise Strategy (2004) and Lewisham's Control of pollution and noise from demolition and construction sites code of practice (2008):

There is a limited policy detail in the London Plan and Core Strategy with which to guide noise and vibration management and reduction within Lewisham. The Mayors Ambient noise strategy is relatively comprehensive although it is lacking in detail which is specifically relevant to Lewisham. Lewisham's Control of pollution and noise from Demolition and Construction document, whilst applicable and comprehensive, focuses solely on reducing noise arising from construction and does not address other sources of noise and vibration production within the borough.

Therefore, DM Policy Option 25 is likely to provide increased certainty for developers in implementation within the borough compared to this alternative. Similarly for this alternative, the positive effects for the Lewisham community detailed for the DM

Policy Option 25 less likely to be realised. Alternative 1 also relies on a large volume of other information and documents. This may make implementation of the alternative cumbersome as well as difficult to monitor. It may also discourage developers and frustrate the promotion of enhanced landscapes and retention of trees within Lewisham.

### **DM Policy Option 26 - Lighting**

1. *The Council will require applicants to protect local character, residential amenity and the wider public, biodiversity and wildlife from light pollution and nuisance, by:*
  - a. *taking appropriate measures in lighting design and installation in line with the Institute of Lighting Professionals' Guidance Notes for the Reduction of Obstructive Light (2011) to control the level of illumination, glare, spillage of light, angle and hours of operation,*
  - b. *using energy efficient and solar powered lighting for energy conservation where feasible,*
  - c. *providing sensitive lighting for footpaths, cycling paths and public parking areas in the development with particular consideration of the potential adverse impact on biodiversity,*
  - d. *preventing the adverse impact of light pollution at all stages of development, from building demolition and construction to occupation.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Landscape

The policy option seeks to reduce the impact of light pollution in the borough whilst also promoting sensitive lighting to enhance accessibility. Lighting which is sensitive to the needs of the community and biodiversity will have long term positive effects for the local environment as well as human health and well-being. Appropriate lighting is important for health and safety, to reduce the fear of crime and encourage social cohesion.

**Adverse Impacts:** Population, Material assets.

The policy option presents restrictions and conditions for developers, and may increase the cost of development leading to adverse effects on the local economy. Additional lighting within the borough may also have an adverse effect on resource use due to the increased electricity usage. This will, however, depend on how the policy is implemented.

### Alternative 1: Reliance on the London Plan and Core Strategy:

There is limited policy detail in the London Plan and Core Strategy with which to guide light management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage light pollution and sensitive lighting within the borough, which may impact on implementation. This would likely result in reduced beneficial impacts to those presented for DM Policy Option 26.

### DM Policy Option 27 - Contaminated Land

1. *The Council will require applicants to comply with the following step approach to minimise and mitigate any harmful effects to human health and the environment by requiring an appropriate level of Land Contamination Assessment. This is applicable wherever development is proposed on contaminated land, land suspected of being contaminated, or if a sensitive use is proposed to ensure contamination is properly addressed. Applicants are required to:*
  - a. *complete a Preliminary Risk Assessment, consisting of a desk top study and site walkover report that shows all previous and existing uses of the site and adjacent land, and which assesses what the potential contamination risks to identified receptors are,*
  - b. *undertake a Site Intrusive Investigation, where necessary, to provide sufficient information to characterise the site and provide for a detailed assessment of the risks to all receptors that may be affected, including those off site,*
  - c. *obtain a Remediation Strategy, where contamination exists, for the Council's approval to deal with the identified hazards to ecosystems, humans, property and controlled waters and subsequent management and monitoring arrangements,*
  - d. *submit a Verification Plan for any remediation works, completed by a suitably qualified person that would be fully implemented and verified before occupation of the site to ensure effective measures would be taken to treat, contain or control the contamination in order to protect:*
    - i. *the occupiers of development and neighbouring land uses,*
    - ii. *the structural integrity of new and existing buildings and*
    - iii. *any watercourse, water body or aquifer.*
  - e. *submit a Verification Report, before occupation of the site, demonstrating completion and validation of works set out in the approved Remediation*

*Strategy and the effectiveness of the remediation, for approval in writing by the Council. The report shall include results of sampling and monitoring carried out in accordance with the approved Verification Plan to demonstrate that the site remediation criteria have been met.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Soil, Water, Air, Climatic factors, Material assets, Landscape.

The policy option requires planning applications to manage the impact of and remediate contaminated land. Remediation of contaminated land can have far reaching benefits for the environment and for community health and wellbeing although the outcome and the benefits accrued from remediation are dependent on the subsequent land-use type after remediation. Open spaces are likely to be of greater benefit to biodiversity, climate change adaptation, etc. as well as human health and well-being.

**Adverse Impacts:** Population.

The policy option places tight controls on developers seeking to develop or own contaminated land. Remediation can result in a high cost and may constrain development in these locations, therefore contaminated land sites may be left undeveloped for an extended period of time.

Alternative 1: Reliance on the London Plan and Core Strategy:

There is limited policy detail in the London Plan and Core Strategy with which to guide contaminated land management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage contaminated land within the borough., which may impact on implementation. This would likely result in reduced beneficial impacts to those presented for DM Policy Option 28.

5.3.8 *Option: Transport*

**DM Policy Option 28 – Car parking**

1. *The Council will require parking standards in accordance with Core Strategy Policy 14.*
2. *Car limited development will only be considered where there is:*
  - a. *PTAL level 4 or higher, or where this can be achieved through investment in transport infrastructure and services,*
  - b. *no detrimental impact on the provision of on-street parking in the vicinity,*
  - c. *no negative impact on the safety and suitability of access and servicing,*
  - d. *protection of required publicly accessible or business use car parking,*

- e. *inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site car parking provision,*
  - f. *an equitable split of parking provision between private and affordable residential development,*
  - g. *on-site accessible priority parking for disabled drivers.*
3. *Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street car parking.*
  4. *Wheelchair accessible car parking is required to be provided in accordance with best practice standards.*
  5. *All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed. Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.*
  6. *Applicants will be required to negotiate appropriate provision of parking for motorcycles.*

**Beneficial Impacts:** Population, Human health, Air, Climatic Factors, Landscape. The policy option presents various conditions upon which car limited development will be approved. Promotion of car limited development is likely to have long term benefits for the environment, as air quality improves and the reduction in private cars use/fossil fuel dependency assists with climate change adaptation. There are also likely to be direct benefits for community health and wellbeing as local air quality improves and, as long as new developments remain accessible through public transport or other sustainable modes, accessibility to community services are maintained. The policy option may also have indirect benefits for the economy as reductions in congestion and improvement in air quality make Lewisham a better place to live and work.

**Adverse Impacts:** Population.

Potential for conflicts with the economy as provision of car limited development may discourage some users from using shopping centres etc.

Alternative 1: Allowing car limited development for those sites located within PTAL level 3 or higher:

The alternative is likely to result in a greater amount of car limited development which is likely to have long term, direct positive effects for the environment. However, these developments will not be as accessible when compared to PTAL 4

sites, and there may be adverse effects for the local economy and increased deprivation as people find it more difficult to access these sites..

Alternative 2: Reliance on the London Plan and Core Strategy:

Taken from the Sustainability Appraisal of Core Strategy Policy 14

*“Positive sustainability impacts, particularly in terms of reducing reliance on private motorised transport and the associated benefit that this would have on air quality and healthy communities. The promotion of public transport would also help to tackle social exclusion by providing a transportation option which is accessible to all. Accessibility improvements will help to contribute to economic growth. The movement of freight will be reliant on implementation to reduce negative impacts on river quality and local air quality.*

Core Strategy Policy 14 and DM Policy Option 28 are both aimed at managing the sustainable transport in Lewisham, however DM Policy Option 28 provides much more detail to guide the appropriate provision of car parking in the borough for developments. This provides much more certainty to developers and provides clear criteria for car limited development to achieve the beneficial impacts detailed above. This is similar as for the London Plan policies which provide overarching policies dealing with transport across the region for strategic direction to be incorporated into LDF preparation. Similarly, the benefits and adverse effects are as reliance on the Core Strategy.

5.3.9 *Option: Promoting Good Design*

**DM Policy Option 29 - Urban Design and Local Character**

*General principles*

1. *The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met. This policy option is supported by various Supplementary Planning Guidance Documents as referenced in the Core Strategy.*
2. *Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in the Lewisham Character Study.*
3. *The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and where appropriate should influence the future character of new development and the development of a*

*sense of place. If necessary the value and significance as a heritage asset will be assessed as part of any development proposal.*

- 4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.*

#### *Detailed design issues*

- 5. Development applications will also be required to address the following detailed matters in the Design and Access Statement to demonstrate the required site-specific design response:*
  - a. how the development will establish a satisfactory relationship to the existing townscape, natural landscape, open spaces and topography to preserve and/or create an urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape, open space and views and vistas taking all available opportunities for enhancement*
  - b. height, scale and mass in relation to the surrounding built context*
  - c. layout and access arrangements. Large areas of parking and servicing must be avoided.*
  - d. how the scheme relates to the scale and alignment of the existing street including its building frontages*
  - e. the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities and the public transport network, including meeting the needs of disabled and older people and people with young children*
  - f. the quality and durability of building materials and their sensitive use in relation to the context of the development. Materials used should be high quality and either may match or complement existing development and the reasons for the choice of materials should be clearly justified in relations to the existing built context*
  - g. details of degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials*
  - h. how the development at ground floor level will provide visual interest for the public including to the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain*
  - i. new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8*

**Beneficial Impacts:** Population, Human health, Water, Air, Climatic factors, Material assets, Biodiversity, Landscape.

The policy option promotes the incorporation of sustainable design principals and consideration of local character and open spaces into building and townscape design. The policy option is broadly positive over a range of objectives as it promotes climate change and flood risk adaptation and management, biodiversity enhancements, protection of historical assets and character, and social cohesion and health equality. The policy option is likely to have positive economic benefits for Lewisham in the long term, as the borough becomes a more attractive place to live and work.

**Adverse Impacts:** Population, Waste.

The policy option will impose various restrictions on development which may have a short term adverse impact on the local economy if restrictions are too stringent. The policy option will also drive future development which is likely to result in construction waste. It is also important to consider from where the materials for development driven by DM Policy Option 29 will be sourced. Materials should be sustainable and sourced locally wherever possible to reduce adverse impacts on resource use.

Alternative 1: Provide a simple, criteria based policy as well as Supplementary Planning Documents (SPD's) and/or Neighbourhood Plans:

The benefits and adverse effects for Alternative 1 are likely to be very similar to those described for DM Policy Option 29, above. Positive social and environmental effects are expected, with indirect economics benefits expected in the long term. Alternative 1 will offer a greater amount of detail which may be better tailored to local requirements as Supplementary Planning Documents and Neighbourhood Plans are produced. The inclusion of a criteria-based policy in the current DM is also likely to be beneficial as it will guide development in the interim between the DM being published and the Supplementary or Neighbourhood plans being produced.

Alternative 2: Reliance on the London Plan and Core Strategy:

Policies relating to urban design within the London Plan and Core Strategy, while promoting sustainable design and protection of townscape and historical assets, are less detailed than DM Policy Option 29. Reliance on the London Plan or Core Strategy alone is likely to be less effective than using DM Policy Option 29 which is more prescriptive and focussed on promoting good urban design and protecting local character.

**DM Policy Option 30 - Alterations and extensions to existing buildings including residential extensions**

1. *Development proposals for alterations and extensions, including roof extensions will be required to be of a high site specific, sensitive design quality and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, porches etc., and use high quality matching or complementary materials sensitively in relation to the context. New rooms provided by extensions to residential buildings will be required to meet the space standards in Policy Option 31 Housing Design, layout and space standards.*
2. *In addition, where it is necessary:*
  - a. *side extensions should normally be set back from the main building line to allow for a clear break between existing buildings and the new work to maintain architectural subordination to the original building.*
  - b. *Rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope. Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building.*
  - c. *residential extensions, roof terraces and balconies and non-residential extensions adjacent to residential dwellings should result in no appreciable loss of privacy and amenity (including sunlight and daylight) for adjoining houses and their back gardens. Residential extensions should retain an accessible and usable private garden that is appropriate in size in relation to the size of the property, and retain 50% of the garden area.*
  - d. *additional or enlarged windows, doors etc. should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows, where controllable by the Council, should closely match the pattern of the original windows. The repair of original windows will be encouraged.*
  - e. *details of plant, pipework, fire escapes, lifts and other mechanical equipment including ducts and flues should be included within the initial planning application and be enclosed within the envelope of the building or, where that is impracticable, sited where they will have the least visual impact*

3. *Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area.*
4. *Where the roofline or party walls are exposed to long views from public spaces and where a roof extension in any form would have an obtrusive impact on that view will not be permitted.*

**Beneficial Impacts:** Cultural heritage/townscape, Material assets.

The policy option seeks to protect and enhance the townscape and preserve the local character by ensuring conditions are applied to specific developments involving building extensions and alterations. The policy option is likely to have positive effects on the look and character of the townscape, and protect cultural heritage assets.

**Adverse Impacts:** Population, Human health, Air, Waste, Climatic factors.

The policy option places certain conditions on development which may adversely affect the local economy in the short term. The policy option also requires the use of certain types of materials which may be difficult to source locally; this may result in materials being transported long distances thus increasing congestion and reducing air quality. Transportation will also have a negative effect on climate change mitigation.

Alternative 1: Use of Supplementary Planning Documents (SPD) and other general policies within the DM:

The benefits and adverse effects for Alternatives 1 are likely to be very similar to those described for DM Policy Option 30, above, with benefits for the townscape and historical assets expected. The Alternative will offer greater detail which may be better tailored to local requirements. A possible short-coming of Alternative 1 is the fact that limited policy detail will be available until the SPD is published which could result in loss of urban character in the interim

Alternative 2: Provide a greater level of details in the current DM, negating the need for Supplementary Planning Guidance:

The benefits and adverse effects for Alternative 2 are likely to be very similar to those described for DM Policy Option 30 and Alternative 1, above. Greater detail will allow for clearer guidance and potentially better implementation. Greater detail in the current DM policy option will also ensure a good level of detail is available to developers in a timely fashion.

Alternative 3: Reliance on the London Plan and Core Strategy:

The applicable Core Strategy Policy (Policy 15) is not directly applicable to the aims of DM Policy Option 30, and is therefore likely that reliance on the Core Strategy will

be less successful at achieving the development aims currently set out in DM Policy Option 30. This may lead to confusion for developers and potentially greater adverse effects for the townscape and cultural heritage assets in the long term if loss of urban character. The London Plan does not provide specific policies for this type of development, thus is not likely to have the positive effects on townscape that DM Policy Option 30 does.

### **DM Policy Option 31 - Housing Design, Layout, and Space Standards**

#### *Siting and Layout of development*

1. *The siting and layout of new build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.*
2. *New build housing development will be required to be:*
  - a. *sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment. Table 2.3 Sustainable Residential Quality Matrix will be used to assess the appropriate density of development in relation to public transport accessibility and character areas*
  - b. *provided with a readily accessible, secure, private and usable external space suitable for children's play*
  - c. *designed so that that schemes in mixed tenure do not distinguish visually between public and private housing provision either in terms of quality of materials and design, or in level of amenities*
  - d. *designed to be safe and secure and reduce crime and the fear of crime.*
3. *The South East London Housing Partnership Wheelchair Homes Design Guidelines (or as subsequently amended) will be used to assess whether new build housing schemes meet Lifetime Homes and Wheelchair Housing Standards both in terms of internal layout and the external design features needed to ensure houses are accessible to their users.*

#### *Internal Standards*

4. *The London Plan and the London Plan Housing Supplementary Planning Guidance will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals provide accommodation that meet the following criteria:*
  - a. *meet the minimum space standards for new development (including any flat conversions allowed under Option 3) meet the standards which*

*should conform with the standards in the London Plan and the London Plan Supplementary Planning Guidance on Housing (as updated).*

- b. habitable rooms and kitchens and bathrooms are required to have a minimum floor height of 2.5 m between finished floor level and finished ceiling level. Space that does not meet this standard will not count towards meeting the internal floor area standards*
- c. provide accommodation of a good size, a good outlook, with acceptable shape and layout of rooms, with main habitable rooms receiving direct sunlight and daylight. Single aspect dwellings will not usually be considered acceptable. Residential units provided should normally be dual aspect. Any single aspect dwellings provided will require a detailed justification as to why a dual aspect dwelling is not possible and a detailed demonstration that adequate lighting and ventilation can be achieved. North facing single aspect flats will not be supported.*
- d. family housing (dwellings with three or more bedrooms) should be designed to have the potential to separate dining and living accommodation from the kitchen area in order to ensure privacy for the occupants*
- e. studio flats (one person dwellings at GIA 37 sq. m.) will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations in the major and district town centres.*
- f. include sufficient space for storage and utility purposes in addition to the minimum space standards.*

**Beneficial Impacts:** Population, Human health, Climatic factors, Material assets, Landscape.

The policy option is focussed on housing layout and design and promotes housing development which does not adversely affect the amenity and character of the land and townscape, and which provides good quality, accessible housing for the occupant. This policy option is likely have a number of direct, long term benefits for protecting and enhancing the townscape and in promoting equality in human health, social cohesion and reducing crime and the fear of crime. By promoting placement near to public transport and designing environmentally sustainable homes, the policy option is also likely to have indirect positive benefits on resource use and climate change.

**Adverse Impacts:** Population

The policy option seeks to place housing in accessible areas with the consequent potential for land-use competition with businesses or other industries. This may have adverse effects for the local economy, however is mitigated through the other DM Policy Options discussed above which seek to maintain and enhance business,

commercial and other uses, with restrictions placed on any proposed change to residential use.

Alternative 1: Producing Supplementary Planning Documents and using less detailed policy in the DM:

The benefits and adverse effects for Alternatives 1 are likely to be very similar to those described for DM Policy Option 31, above, with similar socio-economic and environmental benefits, as are detailed for DM Policy Option 31 above. The Alternative will offer greater amounts of detail which may be better tailored to local requirements. A possible short-coming of Alternative 1 is the fact that limited policy detail will be available until the SPD is published, within this time period detailed design principles will not be applied to new developments. This could lead to confusion for developers and the planning authority in the interim between.

Alternative 2: Reliance on the London Plan and Core Strategy:

The London Plan policies provide guidance for LDF preparation and thus reliance on it would not provide the beneficial outcomes from a more detailed DM Policy Option 31. The applicable Core Strategy Policy (Policy 15) is not completely appropriate for the aims of DM Policy Option 31, and is therefore likely that reliance on the Core Strategy will be less successful at achieving the development aims currently set out in DM Policy Option 31. This uncertainty may have adverse affects for the townscape, as well as health and wellbeing of the local community.

**DM Policy Option 32 – Infill, Backland, Back Gardens and Garden Amenity Areas development**

*General principles*

1. *Depending on the character of the area and the urban design function a space fulfils in the streetscape, some sites will not be considered suitable for development and planning permission will not be granted.*
2. *If a site is considered suitable for development planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape. This includes the importance of spaces between buildings which may be as important as the character of the buildings themselves , and the size and proportions of adjacent buildings.*
3. *Development on these sites must meet the policy requirements of DM Option 29 (Urban design and local character),DM , Option 31 (Housing design and space standards) and Option 24 (Landscaping and trees).*

4. *Development on these sites should retain existing form or informal pedestrian through routes.*

#### *A. Infill sites*

1. *Development within street frontages and on street corners will only be permitted where they:*

- a. *make a high quality positive contribution to an area*
- b. *provide a site specific creative response to the character and issues of the street frontage typology identified in the Lewisham Character Study, and any relevant Conservation Area Appraisal*
- c. *result in no significant overshadowing or overlooking to adjacent houses and gardens*
- d. *provide appropriate amenity space in line with DM Option 31 (Housing Design, Layout and Space Standards)*
- e. *retain appropriate garden space for adjacent dwellings*
- f. *repair the street frontage and provide additional natural surveillance*
- g. *provide adequate privacy for the new development and*
- h. *respect the character, proportions and spacing of existing houses.*

#### *B. Backland sites*

1. *New development on sites of this type will only be permitted where they provide:*

- a. *a proper means of access and servicing which is convenient and safe both for drivers and pedestrians*
- b. *no significant loss of privacy, amenity and no loss of security for adjoining houses and rear gardens and*
- c. *the provision of appropriate amenity space in line with the policy requirements in DM Option 31 (Housing Design, Layout and Space Standards).*

2. *Gated developments on these sites that prevent access which would normally be provided by a publicly accessible street will not be supported.*

#### *C. Back gardens*

1. *The development of back gardens for separate dwellings in perimeter form residential typologies identified in the Lewisham Character Study will not be granted planning permission.*

#### *D. Amenity areas*

1. *Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:*

- a. *repair or re-provide active street frontages*
- b. *increase natural surveillance*
- c. *retain existing private rear gardens where they are provided*
- d. *retain adequate amenity space for the existing development according to the requirements of Option 31 Housing design, layout and Space Standards*
- e. *provide no significant loss of privacy and amenity and no loss of security for adjoining residential development and private back gardens and*
- f. *provide adequate privacy for the new development.*

**Beneficial Impacts:** Population, Biodiversity, Soil, Water, Air, Climatic factors, Landscape.

The policy option guides development of infill, back gardens, garden amenity sites and back-land areas in a manner which will not adversely impact the townscape and character of an area, reduce the amenity, or result in a reduction in wildlife habitat. The policy option also stipulates that this development type must not exacerbate parking or congestion problems within a given area. It is therefore likely to have benefits for the environment, as well as long term indirect benefits for the local economy.

**Adverse Impacts:** None noted.

Alternative 1: Reliance on the General Principles detailed in DM Policy Option 31

Alternative 1 is likely to have similar positive and negative environmental, social, and economic effects when compared to DM Policy Option 32, as are detailed above. The key difference is that DM Policy Option 32 related specifically to infill and back-land development and therefore is likely to provide clearer and more effective guidance, in this regard.

### **DM Policy Option 33 - Thames Policy Area and Creekside**

1. *New development within the Thames Policy Area or on sites adjacent to Deptford Creek will need to, where appropriate, improve the relationship of the River Thames or Deptford Creek with the local context, by:*

- a. *maintaining and improving the relationships of local views, existing visual links and physical connections, landmarks, recreational facilities, listed buildings and the archaeological heritage with the river or creek*

- b. providing a mixture of uses on sites to be developed adjacent to the river or creek*
- c. addressing the river or creek as an important part of the public realm, and contribute to the liveliness of the waterfront by providing a mixture of uses including where appropriate the inclusion of public uses on the ground floor of buildings along the Thames Path.*
- d. encouraging river-related and marine uses where appropriate in line with other policies in the Plan*
- e. maintaining and where appropriate enhancing the appearance and nature conservation interest of the river corridor including the river or creek walls and foreshore*
- f. resisting encroachment in to the creek or river and foreshore and*
- g. maintaining the stability of the flood defences, and examining opportunities to retreat the flood defences to increase flood storage, wildlife and aesthetic value and visual connections with the river or creek.*

**Beneficial Impacts:** Population, Human health, Biodiversity, Water, Material assets, Cultural heritage

The policy option seeks to develop and enhance the portion of the Thames Path and surrounding area which falls within Lewisham. The policy option acknowledges the need for mixed land-use, the protection and enhancement of the land/townscape and historical assets, improved access, and retention and development of the flood defences. It is anticipated that the policy option will benefit the local economy as the living and working environment is improved, with further positive effects for community health and wellbeing and social cohesion. The protection afforded to the surrounding landscape and promotion of nature conservation interests will benefit biodiversity and the consideration given to the Thames flood defences will reduce flood risk.

**Adverse Impacts:** Population, Material assets.

The policy option promotes development in the area which will require resource use and the production of waste. Short term noise, vibration and air quality impacts are also likely during construction.

#### Alternative 1: Reliance on the Core Strategy and London Plan

There is limited policy detail in the London Plan and Core Strategy with which to guide development of the Thames area within Lewisham. This could reduce the likelihood of the enhancement and development detailed above occurring, and may result in many of the economic, environmental and social benefits being lost.

### **DM Policy Option 34 - Public Realm and Street Furniture**

1. *Public spaces should be designed to be safe, inclusive, accessible, attractive and robust, enhancing existing connections and providing new connections as appropriate. The provision of public art will be encouraged. The Council will require street paving and furniture, public art and street signage to:
  - a. *be well designed using high quality materials*
  - b. *harmonise with the street scene*
  - c. *be sited to minimise visual clutter*
  - d. *allow level and safe passage for all including people with disabilities including the careful design of shared surfaces with cyclists**
2. *Trees are an important part of the street scene and should be accommodated wherever possible and carefully sited in line with the above principles.*
3. *In Conservation Areas the Council will seek to ensure that street furniture and paving is compatible with the character of the area.*
4. *The Council will seek the preservation of historic street furniture and other non-designated heritage assets that are of value to the local street scene.*

**Beneficial Impacts:** Population, Biodiversity, Material assets, Cultural heritage, Landscape.

The policy option seeks to reduce the impact of street furniture on the townscape and for people using pedestrian walkways. It also seeks to improve the townscape through the use of appropriate street furniture which matches the local character. There are also likely to be indirect positive effects on the environment through the promotion of street trees and vegetation which provides mitigation against air pollution and the urban 'heat island' effect. Overall, the policy option is likely to improve the aesthetic value of Lewisham, making it a nicer place to live and work.

**Adverse Impacts:** Water use

Additional trees within the borough are likely lead to increase use of natural resources, as the trees require watering and upkeep, however this is considered to be offset through the benefits this vegetation provides.

#### **Alternative 1: Reliance on the Lewisham Streetscape Guide and Core Strategy:**

Reliance only on the Lewisham Streetscape Guide and Core Strategy is likely to have similar positive and adverse effects to DM Policy Option 34. The Lewisham Streetscape Guide is very detailed and provides good guidance on streetscape design within Lewisham. It is likely that implementation of DM Policy Option 34 in

conjunction with the use of the guidance, will bring about the greatest benefits to the Lewisham streetscape.

### **DM Policy Option 35 – Listed Buildings, Conservation Areas and other Designated Heritage Assets**

*New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens*

#### *A. General principles*

- 1. For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.*
- 2. Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.*
- 3. The Council encourages the adaptation of historic buildings to improve energy efficiency in line with the detailed guidance provided by English Heritage. Careful consideration should be given to the most appropriate options for insulation, power use and power generation. Intrusive interventions, such as externally mounted micro-generation equipment or external wall insulation, should be avoided where these would unacceptably alter the character and appearance of the heritage asset. The Council encourages the retention and thermal upgrading of historic windows.*

#### *B. Conservation areas*

- 1. The Council having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving and enhancing their character and appearance, will not grant planning permission where:*
  - a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials*
  - b. development, which in isolation would lead to less than substantial harm to the building or area, but would cumulatively adversely affect the character and appearance of the conservation area*



**Beneficial Impacts:** Cultural heritage, Air, Population, Human health, Climatic factors, Material assets

This Policy Option provides detailed policies for the conservation and enhancement of heritage assets within Lewisham and their use in the creation of sustainable places. Through considering the retrofit of environmentally sustainable features to heritage assets, impacts associated with air, water and climate change may be mitigated. Through the protection of landscaping features, the maintenance and enhancement of landscapes and townscapes will benefit the health and wellbeing of the Lewisham population.

The policy option seeks to protect and enhance buildings (and in particular cultural heritage assets) within conservation areas. This is likely to have long-term benefits for cultural heritage assets as buildings of historical significance are protected. There may be other indirect benefits for biodiversity, as bats favour older buildings; community identity, as cultural heritage assets give character to an area and have a historical significance; and waste production, as few buildings are demolished and re-built in the conservation area.

**Adverse Impacts:** Climate factors, water, air

The retrofitting of existing heritage assets with environmentally sustainable equipment (e.g. energy efficiency) may be limited and/or restricted in heritage listed buildings which may not provide the efficiencies/savings of new development, leading to resource consumption.

Protection of cultural heritage assets may result in land-use conflicts as various use-types may be prohibited within certain buildings. This may restrict development and have adverse effects on the local economy in the short - medium term. Retention of heritage assets may also have an adverse effect on the environment and resource use; older buildings may not be able to meet current energy efficiency standards. Although dependent on implementation, retention of older housing stock may also reduce the range of housing types and tenures available, thereby entrenching existing inequalities in the borough. There may also be related adverse effects on human health and social cohesion as older buildings are retained, and a reduced amount of good quality, affordable housing is available.

#### Alternative 1: Reliance on the London Plan and Core Strategy

The London Plan policies provide guidance on the protection of listed and other protected assets within London, however with most detail directed for LDF preparation for local context. The Sustainability Appraisal of Core Strategy Policy 16 states that '*the policy will contribute to maintaining or enhancing heritage assets and the historic environment of the borough*'. However, although the Core Strategy mentions a number of conservation areas within Lewisham and promotes the protection and enhancement of these areas, there is far less detail in the Core

Strategy policy, when compared to DM Policy Option 36. The DM policy option is more detailed and prescriptive and is likely to be clearer for developers and interested parties to follow.

**DM Policy Option 36 - Non designated heritage assets including Locally Listed Buildings, Areas of Special Local Character and Assets of Archaeological Interest**

*A. General principles*

- 1. The Council will protect the local distinctiveness of the borough by sustaining and enhancing the significance of non-designated heritage assets.*
- 2.. Development proposals affecting non-designated heritage assets should be accompanied by a heritage statement proportionate to the significance of the asset which justifies the changes to the asset.*
- 3.. Non-designated heritage assets may be identified during the development management process.*

*B. Locally listed buildings*

- 1. The Council will seek to ensure and encourage the conservation and enhancement of locally listed buildings and structures, and use its powers to protect their character, significance and contribution made by their setting where appropriate.*
- 2. The Council will generally resist the demolition of locally listed buildings and expect applicants to give due consideration to retaining and incorporating them in any new development.*

*C. Areas of special local character*

- 1. Development in areas of special local character should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas.*
- 2. The Council will resist demolition of unlisted buildings in areas of special local character where these contribute to architectural and townscape merit and local distinctiveness of the area.*

*D. Non designated heritage assets of archaeological interest*

- 1. The Council will ensure that non designated heritage assets of archaeological interest that are demonstrably of equivalent significance to schedule monuments will be considered subject to the policies for designated heritage assets.*

2. *The conservation, protection and enhancement of the archaeological heritage of the borough will be promoted through:*

- a. *Requirements to assess and plan for the archaeological implications of development proposals that may affect the archaeological heritage of a site which may require preliminary archaeological site evaluations. Proposals on sites within Areas of Archaeological Priority as shown on the Proposals Map should be accompanied by an evaluation. Evaluations should be commissioned from professionally qualified archaeological organisations or consultants.*
- b. *Ensuring development proposals safeguard archaeological sites and seeking to ensure that where justified important archaeological remains are where possible permanently preserved in situ with public access, display and where appropriate given statutory protection.*
- c. *Where permanent preservation is not justified the remains are investigated recorded and subsequently published by a recognised archaeological organisation prior to the start of development.*
- d. *Where remains unexpectedly come to light seeking ensure their preservation or their recording in consultation with the applicant.*

**Beneficial Impacts:** Biodiversity, Material assets, Cultural heritage, Landscape.

The policy option promotes the protection of other cultural heritage assets and is likely to result in direct long term benefits for the protection of these features. Protection and retention of old building stock may also reduce the amount of building waste produced and could have indirect benefits for biodiversity as bats often favour older buildings as roost sites.

**Adverse Impacts:** Population, Human health, Climatic factors, Water, Air

The policy option may impose restrictions on certain development within Lewisham which may have an adverse effect on the local economy. Furthermore, retention of older housing stock may entrench inequalities in health and access to good affordable homes, thereby having an adverse effect on human health and wellbeing. However, these adverse impacts on human health might be mitigated by the positive impacts on perceptions of health and mental well-being by ensuring the retention of heritage assets that are familiar, well-loved and provide a sense of stability, history, continuity and place in the community.

Older building stock is also unlikely to meet current energy efficiency standards and may therefore have an adverse effect on resource use and climate change mitigation and adaptation.

#### Alternative 1: Reliance on the London Plan and Core Strategy:

The Sustainability Appraisal of Core Strategy Policy 16 states that '*the policy will contribute to maintaining or enhancing heritage assets and the historic environment of the borough*'.

However, although the Core Strategy mentions a number of conservation areas within Lewisham and promotes the protection and enhancement of these areas, there is far less detail in the Core Strategy policy, when compared to DM Policy Option 36. The DM policy option is more detailed and prescriptive and is likely to be clearer for developers and interested parties to follow. This is the same situation for the London Plan policies and guidance.

#### Alternative 2: Reliance on the National Planning Policy Framework and on the guidance in the Companion Guide to PPS5.

Reliance on the NPPF and Companion Guide to PPS5 is likely to have similar positive and adverse effects to DM Policy Option 36. The key difference being that DM Policy Option 36 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.

#### **DM Policy Option 37 Demolition or substantial harm to designated and non-designated heritage assets**

1. *Proposals for the demolition or substantial harm to a heritage asset will only be considered under exceptional circumstances where the public benefits outweighs the loss of, or harm to, the asset. The Council will require applicants to demonstrate that there is no practical way of realising the benefits without demolishing the building or causing substantial harm.*
2. *Where demolition is proposed, the following will be taken into account:*
  - a. *The significance of the asset, architecturally, historically, contextually; and any communal value*
  - b. *The condition of the asset and the economic viability of its repair and re-use*
  - c. *The adequacy of marketing efforts made to retain the asset in use*
  - d. *The adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership*
  - e. *The public benefits of any alternative proposal for the site.*

3. *Development proposals involving substantial structural alterations to a heritage asset need to demonstrate that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.*
4. *Where demolition is proposed on grounds that a building's condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably qualified conservation professional and must describe, explain and illustrate the structural problems, and discuss repair options.*
5. *Where repair is not economically viable, the Council will require full supporting evidence, for example*
  - a. *A valuation of the existing building and site*
  - b. *A full survey identifying the repairs required*
  - c. *Development costs including a costed schedule of repairs*
  - d. *An estimate of the value of the repaired property, including potential yields*
  - e. *Evidence that the property has been marketed for a reasonable period at a price reflecting its condition*

*Where there is evidence of deliberate neglect or damage to a heritage asset, the deteriorated state of the asset will not be taken into account in the Council's decision*
6. *Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.*
7. *Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development.*

**Beneficial Impacts:** Population, Human health

This Policy Option aims to provide very clearly criteria that developers would need to satisfy in order for the demolition or substantial harm to heritage assets to be considered. This provides protection to these assets in all but circumstances where it can be demonstrated their retention is no longer viable. The requirement for replacement development will provide beneficial impacts to the community through the provision of sustainable places which may be difficult when considering the retrofit of existing infrastructure.

Protection and retention of old building stock may also reduce the amount of building waste produced and could have indirect benefits for biodiversity as bats often favour older buildings as roost sites.

**Adverse Impacts:** Material assets, Population, Air, Cultural Heritage

Adverse impacts may be realised by the community through the loss of heritage assets within Lewisham and the subsequent material use and construction impacts associated with new development (including air, water and waste).

#### Alternative 1: Reliance on the London Plan and Core Strategy

Reliance on the London Plan and Core Strategy is likely to have similar positive and adverse effects to DM Policy Option 37. The key difference being that DM Policy Option 37 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.

#### Alternative 2: Reliance on the National Planning Policy Framework and on the guidance in the Companion Guide to PPS5.

Reliance on the NPPF and Companion Guide to PPS5 is likely to have similar positive and adverse effects to DM Policy Option 37. The key difference being that DM Policy Option 37 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.

### **DM Policy Option 38 – Domestic Masts and Other Telecommunications Equipment**

#### *Domestic Satellite Dishes and Telecommunications Equipment*

1. *Satellite dishes and other telecommunications equipment should always be designed and sited where they will have the least detrimental visual impact, in particular not on a principal street frontage. They should also not be detrimental to the character of Conservation Areas, Listed buildings and other designated and non designated heritage assets or to the amenities of a residential area. This will usually entail permitting not more than one satellite dish per building and resisting visually harmful development in respect of premises subject to an Article 4 Direction.*
2. *In carrying out this Policy the Council will:*
  - a. *encourage the provision of communal telecommunications equipment in new development and rehabilitation schemes and where time limited consents have been granted and*

- b. *encourage the removal or upgrading of older telecommunications equipment in order to minimise visual impact.*

#### *Radio and Telecommunications Masts and Infrastructure*

*1. In the case of development proposals for radio and telecommunications masts, including for prior approval under Part 24 of the General Permitted Development Order, these should be supported by the necessary evidence to justify the proposed development. The Council will seek to ensure, in conjunction with operators and developers that in each case the best possible environmental and operational solution is arrived at. This will include:*

- a. *provision of evidence that the possibility of erecting antennae on an existing building, structure, or mast site has been explored, and/or in the case of a new mast or base station that the cumulative exposure when operational will not exceed International Commission in non-ionising radiation protection guidelines*
- b. *in the case of site sharing provision of evidence that the site can accommodate any additional apparatus required*
- c. *Use of design that minimises the size of or camouflages telecommunications apparatus*
- d. *Provision of evidence that new telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or other national services requiring radio communications*

**Beneficial Impacts:** Human health, Material assets, Cultural heritage, landscape.

The policy option protects the landscape and townscape from adverse impacts arising from telecommunications equipment. The policy option is likely to protect cultural heritage assets and improve the aesthetic appeal of Lewisham. This may make Lewisham a more attractive place to live and work, thereby having indirect positive impacts on health and wellbeing.

**Adverse Impacts:** Waste

The policy option promotes the replacement and upgrade of infrastructure. This may increase waste production within the borough.

#### Alternative 1: Reliance on Guidance within the NPPF:

Reliance on the NPPF and legislation is likely to have similar positive and adverse effects to DM Policy Option 38. The key difference being that DM Policy Option 38 is prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation.

### Alternative 2: Reliance on the London Plan and Core Strategy

Reliance on the London Plan and Core Strategy instead of the implementation of DM Policy Option 38 would lead to much greater uncertainty over the considerations and restrictions to the development of telecommunications equipment in Lewisham. This alternative would not have the same beneficial impacts as the policy option and does not provide the implementation certainty for this type of development.

### **DM Policy Option 39 – Public Conveniences**

*The Council will expect new developments which attract large numbers of visitors/customers to make adequate provision for public conveniences, which are well located and signed in relation to pedestrian flows, car parks, public transport and other public places and are accessible for all..*

#### **Beneficial Impacts:** Population, Human health

Through encouraging the adequate provision of accessible public conveniences for new developments, there may be minor positive effects on improving the health and well-being of the population. The provision of equitable facilities as community infrastructure also promotes social inclusion and has the potential to reduce anti-social behaviour.

**Adverse Impacts:** No adverse impacts are identified.

### Alternative 1: Use floorspaces in the policy to identify minimum requirements.

This alternative is likely to have similar impacts as per DM Policy Option 39, however, whilst this alternative may provide greater detail for developers in implementing this policy option, the inclusion of specific floorspaces for minimum requirements may lead to unnecessary restrictions on development within Lewisham. This may have indirect impacts on economic growth within the area.

### Alternative 2: Reliance on the Core Strategy

There are very similar positive and adverse effects as in DM Policy Option 39, however as public conveniences are not specifically referenced in Core Strategy policies, this alternative is unlikely to provide the detail and certainty to ensure this public infrastructure is development to the benefit of the Lewisham community.

#### 5.3.10 *Option: Community Services*

### **DM Policy Option 40 - Innovative Community Facility Provision**

*The Council will encourage the use of innovative solutions to the provision of community meeting space including:*

1. *The potential for new or extended schools to make usable community, sports and leisure space accessible to local people outside of teaching hours.*
2. *The temporary use of vacant or unused inside and outside space for community uses, where it is able to provide a safe and appropriate environment and there is no detriment to local amenity.*

**Beneficial Impacts:** Population, Human health, Cultural Heritage

The use of school facilities for all members of the community will be positive to health inequalities and assist with reducing long term deprivation across Lewisham.

The policy option promotes the temporary use of vacant and unused space; this will assist with reducing crime and ensuring that vacant premises are occupied and maintained in the short term.

**Adverse Impacts:** Population, Water, Air, Climatic factors, Waste

Any new or extended community facilities will put pressure on existing resource use and production of waste; these are likely to increase in the long term, as population grows.

Temporary adverse effects on air and noise quality during the construction phases were also identified, specifically for extensions of existing facilities, use of such facilities maybe disrupted/suspended in the short term during construction.

The removal of permeable surfaces will result in surface run off and increase the likelihood of flood risk, long term this will have detrimental effects on climate change adaptation in severe weather conditions.

Alternative 1: Reliance on the London Plan and Core Strategy

Relying on the London Plan and Core Strategy is likely to have very similar positive and adverse effects as in DM Policy Option 40; the Core Strategy approach is positive towards protecting community facilities; however more detail will strengthen the policy option by enhancing community facility provision.

**DM Policy Option 41 Nurseries and Childcare**

1. *Applications for day nurseries and facilities for the care, recreation and education of children will be required to consider:*
  - a. *the acceptability of the loss of the existing use,*
  - b. *traffic volumes and the effect on congestion,*
  - c. *accessibility by walking, cycling and public transport,*

- d. *Access, egress, cross-site movement and parking / drop off areas, including for disabled users,*
- e. *the impact on local residential amenity, including noise.*

**Beneficial Impacts:** Population, Human health

The detailed policy option seeks to provide day nurseries and facilities for the care, recreation and education of children; this will lead to a positive impact on improving access to skills and training for both children and parents.

Community safety is a key aspect to this policy option which will be beneficial to reducing health inequalities and ensuring that no negative impacts on the community in the long term occur.

**Adverse Impacts:** Population, Water, Air, Material assets, Landscape, Waste.

Land-use competition is likely with other premises such as commercial businesses. All new development will result in use of natural resources and the production of waste during both the construction and operational phases. Temporary adverse effects on air and noise quality during the construction phases were also identified. Long term impacts on the historic environment may occur and loss of permeable surfaces may have a negative impact on flood risk.

Alternative 1: Reliance on the London Plan and Core Strategy

Reliance on the London Plan and Core Strategy without a detailed is likely to have very similar positive and adverse effects as in DM Policy Option 41. The policy within the Core Strategy seeks to limit adverse impacts on local amenity however specific detail is lacking, whereas DM Policy Option 41 includes a greater emphasis on the prevention of negative impacts on local residential amenity.

**DM Policy Option 42 - Art, Culture and Entertainment Facilities**

1. *New or extended art, culture and entertainment uses (including commercial uses) will be encouraged where there is no unacceptable impact on local amenity.*
2. *Existing art, culture and entertainment uses will be protected. Re-development of such sites will only be allowed where there is re-provision in another form / location.*

**Beneficial Impacts:** Population, Human health, Material assets, Landscape.

The detailed policy option seeks to protect and encourage art, culture and entertainment within the Borough of Lewisham; this will be beneficial to economic growth of a variety of sectors. The policy option will also be beneficial to social inclusion, education, skills and training and ensures protection of amenity.

**Adverse Impacts:** Water, Cultural heritage, Waste, Water

All new development will result in use of natural resources and the production of waste during both the construction and operational phases. Long term impacts on the historic environment may occur and loss of permeable surfaces may have a negative impact on flood risk.

Alternative 1: Locate facilities in existing town centres only

Concentration of these facilities in one area may prevent anti-social behaviour and disruption within other areas of Lewisham, affecting the health and well-being of the local population. However, by locating them in town centres, access to facilities would be more likely served by sustainable transport options.

Concentration of art, culture and entertainment facilities in towns centre areas, will not promote social inclusion as accessibility will be reduced. There is a likelihood of an increase in anti-social behaviour in town centre areas.

Impacts on noise, air and vibration will be concentrated in one area which may lead to a negative impact on local amenity and reduce health inequalities.

If accessibility to these facilities is not served by sustainable transport options from all areas across the borough, there may be a negative effect on air quality.

Alternative 2: Allow redevelopment of art, culture and entertainment facilities to other commercial uses

This alternative policy option will be beneficial to other commercial uses in promoting their development in Lewisham, which may have positive effects in terms of economic growth.

However, the implementation of this policy option will result in loss of art, culture and entertainment facilities across Lewisham; this will be detrimental to social inclusion. The long term impacts will be negative as people are likely to leave the borough for art, culture and entertainment facilities, this will result in an imbalance of the population.

Alternative 3: Reliance on the London Plan and Core Strategy

There are very similar positive and adverse effects as in DM Policy Option 42. Policy 4.6 in the London Plan aims to encourage provision of facilities in accessible locations for their sustainable inclusion in the community. The policy within the Core Strategy seeks to ensure a range of health, education, policing, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. However DM Policy Option 42 includes a greater emphasis on the prevention of negative impacts on local

amenity than this alternative, and provides further detail on this type of development in Lewisham.

### **DM Policy Option 43 Places of worship**

1. *The Council's preferred locations for the development of public places of worship are the network of major and district town centres as defined in Core Strategy Policy 6.*
2. *Proposals for development in the major and district town centres and all other areas will only be considered in locations that are:*
  - a. *highly accessible to users through public transport and cycling and walking routes*
  - b. *able to provide an adequate level of parking*
3. *All applications for places of worship will be required to:*
  - a. *demonstrate they are not causing a detrimental affect to employment or future employment space,*
  - b. *demonstrate that there will be no detrimental affect on local amenity through noise, hours of operation or any other environmental impacts,*
  - c. *provide a travel plan to show that the points detailed in Part 1 of this option and other transport issues can be mitigated,*
  - d. *be delivered to the highest design standards.*
4. *Existing places of worship that meet the criteria above will be protected from redevelopment.*

**Beneficial Impacts:** Population, Human health

The detailed policy option seeks to provide places of worship as a suitable land use providing that they are appropriately located, designed, constructed and managed. In order to be acceptable there are a number of criteria that must be met.

**Adverse Impacts:** Water, Air, Waste

The adverse impacts associated with this policy option are associated with the use of natural resources during construction and operation of the facilities.

### **Alternative 1: Allow provision only in edge of town centre locations**

Allowing provision only in edge of town centre locations, will not promote social cohesion due to location restrictions.

Other negative impacts identified were the impacts on congestion and air quality if locations were not accessible by a range of sustainable transport options.

#### Alternative 2: Reliance on the London Plan and Core Strategy

Alternative 2 does not promote high quality design, accessibility and protection of amenity resulting in less positive impacts, which the Policy Option 43 does. DM Policy Option 43 provides detail which should ensure negative impacts such as air quality and resource use are likely to decrease in the long term.

The proposed mitigation measures are summarised in Section 5.3 (Table 5-7).

## **5.4 Equalities Analysis Assessment**

### *5.4.1 Introduction*

An Equalities Analysis Assessment (EqAA) will be prepared as part of draft DMLP following consultation on the further options document. An EqAA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of a policy for different groups in the community. Local authorities have a duty under race, disability and gender legislation to carry out an EqAA of their Local Plans. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EqAA will highlight key issues needing further consideration and the recommendations will be used in the preparation of the draft policies.

### *5.4.2 Monitoring*

The Council understands the importance of monitoring the implementation of plans and developments to ensure that the findings of the EqAA are put in place. Therefore, relevant measures will be included in the DMLP draft plan monitoring framework as part of the next phase of plan preparation.

Monitoring arrangements in the Lewisham Annual Monitoring Report (AMR) will enable the Council to examine and assess more closely the implementation of policies in the DMLP once they are adopted, and how they impact on equalities issues. Monitoring will be undertaken by the Planning Management Team, Resources & Regeneration Management Team, the Corporate Equalities Board and Mayor and Cabinet.

## **5.5 The Habitat Regulations Assessment (HRA)**

### *5.5.1 Process*

The purpose of a HRA is to assess the impacts of a land-use plan, in combination with the effects of other plans and projects, against the conservation objectives of a Natura 2000 site (also known as a European Site) and to ascertain whether that plan would adversely affect the integrity of such a site.

Guidance from the Department of Communities and Local Government (DCLG) on Habitat Regulation Assessment summarises the HRA process prescribed in Article 6(3) and (4) of the Habitats Directive into three main stages:

- Task 1 Assess likely significant effects.
- Task 2 Appropriate Assessment and ascertaining the effect on site integrity.
- Task 3 Mitigation and alternative solutions.

Task 1 of the process is to identify whether the plan policy is 'likely to have a significant effect' on a European site, referred to as 'Screening'. If the Screening process identifies the potential for significant adverse impacts on Natura 2000 sites, tasks two and three of the HRA need to be completed.

In accordance with the Habitat Regulations a HRA is required when, in view of a European site's objectives, a land use plan:

- is likely to have a significant effect on a European site (Natura 2000 site) in Great Britain (either alone or in combination with other plans and/or projects); and
- is not directly connected with or necessary to the management of the site.

#### 5.5.2 *Outcome*

A Habitats Regulations Assessment screening report will be prepared alongside the preparation of the Proposed Submission Version of the DMLP (or the draft plan). This will be done following the public consultation of the DMLP Further Options. At this stage the likely significant effects of the draft policies can be properly assessed, in compliance with the Habitats Directive (92/43/EEC) and the Regulations. This approach has been supported by Natural England and was adopted for other Lewisham DPDs.

There are no designated European sites within the London Borough of Lewisham. Through consultation with Natural England, the European sites to be assessed will be those located within a 15 kilometre radius of the borough boundary as they are considered to be in close enough proximity to potentially be impacted. The report will identify Richmond Park, Wimbledon Common and Epping Forest Special Areas of Conservation and the Lee Valley Special Protection Area (the Natura 2000 sites) for screening purposes. Key habitats, species, qualifying features, conservation objectives, current condition and key ecosystem factors will be presented. The report will provide details of the results of the screening by allocating the most appropriate category (or categories) describing the likely effect that a policy set out in the proposed submission DMLP, could have on the European sites. This includes in combination and cumulative effects.

## 5.6 Cumulative and long term effects

Many environmental problems result from the accumulation of multiple small and often indirect effects, rather than a few large and obvious ones. Examples include loss of tranquillity, changes in the landscape, loss of open space, and climate change impacts.

Cumulative effects can arise where several developments each have effects but combined together have a significant effect, or where several individual effects of a plan (e.g. noise, dust and visual) have a combined effect.

Cumulative effects have been considered throughout the SA and development of the DMLP. The cumulative effects of other plans and programmes were considered within Stage A of the SA process.

Core Strategies set out the key elements of a Local Authority's planning vision and strategy and form the central part of the Local Development Framework (LDF). All other LDF documents must be consistent with the Core Strategy. Therefore all policies within the DMLP must be consistent with those in the Core Strategy.

The DMLP is directly influenced by the Lewisham Core Strategy and is in conformity with it at all times.

### 5.6.1 Assessment of cumulative effects

Assessment of cumulative effects focuses on identifying the total impact of both direct and indirect effects of a plan on receptors. Receptors may include natural resources (e.g. air, water, soil, landscape), sections of the population (e.g. people living in particular areas or vulnerable members of the community) or ecosystems and species.

The likely significant effects on the environment of the DMLP policy options including short, medium and long-term effects, permanent and temporary effects, and secondary, cumulative and synergistic effects were identified and discussed throughout the SA of the policy options.

There are many potential and complex interactions between the DMLP and the environment, and many of the impacts predicted are cumulative in their nature but difficult to predict with certainty.

Implementation of the DMLP may result in cumulative negative effects on air quality, landscape, soils, biodiversity, water quality and climate change, as can development pressure on land use in general.

However, without implementation of the DMLP i.e.: the "business as usual" scenario, the impacts will be far greater, for example 'ad hoc' development is more likely, resulting in further degradation of the environment, that will not promote active travel, include climate change adaptation techniques, reduce traffic congestion etc.

Taking into account the results of the SA at various stages, proposed mitigation measures have been included in the DMLP in the form of policy options, or revision of initially proposed options, to ensure that negative effects are reduced.

The following summarises the predicted cumulative effects.

- *The Local Economy* – Positive long term effects for economic growth and employment are expected, with the retention and protection of employment land and the promotion of retail and business within the town centre. The mixed-use approach adopted by the policy options makes provision for housing, business and open spaces which meet high design standards and contribute to making Lewisham a desirable place to live and work. The effect of these measures is likely to improve the general appeal of Lewisham (and in particular the town centres) for both the public and potential investors, thereby contributing to growing the local economy. The DMLP is therefore expected to have a broadly positive effect on the Lewisham economy and community employment.
- *The Environment* - Broadly positive effects for the environment with improvements to air quality, reductions in noise and vibration, and enhancement of biodiversity and open spaces, expected. These policy options also contribute to mitigation for many of the adverse environmental impacts associated with development and economic growth. Furthermore, the recognition of the importance of sustainable design (including BREEAM and Code for Sustainable Homes standards) and promotion of measures to reduce car-use and congestion are also likely to reduce resource use and contribute to climate change adaptation and mitigation. The cumulative impact of multiple development projects occurring simultaneously will need to be considered at implementation/construction. These could exacerbate short term impacts relating to noise/vibration and air quality, however they can be mitigated through careful phasing of projects and considerate construction practices.
- *Society* – Likely to contribute to long term positive effects on the social fabric of the borough. Various policy options make provision for new high quality housing in a central and easily accessible location, new community facilities, improved public realm and social infrastructure, and a thriving economy and jobs market. These measures, if implemented in conjunction with associated policies designed to reduce adverse effects on the local community (including measures to reduce crime/the fear of crime, sensitive placement of residential housing in relation to noise/antisocial behaviour etc.) will ensure that communities are not adversely impacted by proposed development within Lewisham.

## 5.7 Proposed Mitigation Measures

Mitigation is one of the key outputs of the SEA and appraisal process. The SEA Regulations require that “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”<sup>vi</sup> must be documented in the Environmental Report.

Mitigation measures may themselves have adverse environmental effects which should be recognised. In identifying the need for mitigation and developing specific mitigation measures, attention has been given to the “mitigation hierarchy” set out in Table 5-6. The initial focus of the mitigation hierarchy is avoidance of adverse effects wherever possible.

Table 5-6 Mitigation Approach

Mitigation Approach	Comment
Avoidance or prevention	This involves modifying alternative options and policies for the DPD.
Reduction	At the level of SEA/SA mitigation could focus on timing or phasing to reduce adverse effects.
Offsetting or compensation	This approach is used where opportunities are not available to either avoid or reduce adverse effects.
Remediation	Remediation is used where an adverse effect is unavoidable but the long term effects can be reduced by restoring the affected area to its original state.
Enhancement	Although not strictly a measure to mitigate an adverse effect, enhancement is an opportunity to improve social, environmental and economic conditions. Enhancement could be used successfully to improve conditions.
Further information	Although the overall effects of the preferred options have been assessed through the SA there may be a degree of uncertainty as to the anticipated effects of specific project measures on the ground. In such circumstances mitigation could include specification of the need to conduct further assessments at the measure / scheme level e.g. EIA, HIA.

Table 5-7 Mitigation and where addressed within the DMLP

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Economic			
Eco 1	To encourage sustained economic growth across a variety of sectors	<p>Ensure employment policies are in place to prevent loss of employment land and conflict with other land-uses.</p> <p>Encourage independent mixed local business</p> <p>Improved public realm</p>	<p>DM Option 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham.</p> <p>Employment Land DM Options 8 – 10 seek to protect employment land and promote mixed-use and local business development within Lewisham. Town Centres and Retail policy options including DM Options 11, 12, 13, 14, 17 and 18 promote protection and enhancement of town centres' vitality and viability, retention sensible location of local businesses, and protection of the local character and shop frontages. Furthermore, multiple policy options falling under Promoting Good Design (DM Options 29 to 39) and Climate Change and Environmental Management (DM Options 21, 22, 23, 25 and 28) seek to protect and enhance the public realm and general liveability of Lewisham, encouraging people to live and work within the borough.</p>
Eco 2	To encourage and promote employment and new enterprise in Lewisham	<p>Ensure employment policies are in place to prevent loss of employment land and conflict with other land-uses.</p> <p>Encourage independent mixed local business</p> <p>Improved public realm</p>	<p>DM Option 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham.</p> <p>Employment Land DM Options 8 – 10 seek to protect employment land and promote mixed-use and local business development within Lewisham. Town Centres and Retail policy options including DM Options 11, 12, 13, 14, 17 and 18 promote protection and enhancement of town centres' vitality and viability, retention sensible location of local businesses, and protection of the local character and shop frontages. Furthermore, multiple policy options falling under Promoting Good Design (DM Options 29 -39) and Climate Change and Environmental Management (DM Options 21 - 27) seek to protect and enhance the public realm and general liveability of Lewisham, encouraging people to live and work within the borough.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Environmental			
Env 3	To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates.	<p>Ensure all new developments achieve BREEAM excellent accreditation</p> <p>Promote the reuse and recycling of waste from all streams</p> <p>Promote the use of site waste management plans</p> <p>Ensure new developments incorporate appropriate waste storage facilities into design.</p>	<p>DM Options 14, 16 and 17 place conditions on new shop and restaurant/café/drinking establishments to not adversely affect the local amenity, with specific emphasis placed on waste management.</p> <p>The Core Strategy Policy 8 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Option 21 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. BREEAM sets requirements for waste management and Core Strategy policy 13 deals with waste management locally.</p>
Env 4	To use and manage the consumption of natural resources in a sustainable manner	<p>Ensure all new developments, as well as conversions, extensions, and refurbishments achieve BREEAM excellent accreditation</p> <p>Promote the reuse and recycling of waste from all streams</p> <p>Promote the use of locally sourced sustainable materials</p> <p>Promote energy efficiency designs in developments for example, solar, wind, passive solar</p> <p>Promote water efficiency designs in developments for example, rain water harvesting, grey water recycling</p>	<p>The Core Strategy Policy 8 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Option 21 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. DM Option 21 also promotes the incorporation of passive design measures to manage heating and cooling of buildings – both contributing to energy efficiency.</p> <p>DM Option 23 which encourages the use of green roofs in design will contribute to improving energy efficiency and reducing resource use.</p> <p>London Plan Policy 5.3(C)(h) – Sustainable Design and Construction. “Securing sustainable procurement of materials using local supplies where feasible” will also guide development in Lewisham.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 5	To protect and enhance the borough's open spaces	Promote enhancements of biodiversity through green roofs, green walls, creation of open space, roof gardens, planting of street trees, and provision bat and bird boxes etc.	<p>DM Option 23 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The Option also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Option 24 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity.</p> <p>DM Option 35 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p>
Env 6	To protect and enhance the borough's natural habitat, biodiversity, flora and fauna, and increase opportunities for people to access nature.	<p>Promote enhancements of biodiversity through green roofs, green walls, creation of open space, roof gardens, planting of street trees, and provision bat and bird boxes etc.</p> <p>Ensure adverse effects arising from disturbance (noise, vibration and light) and poor air quality are addressed.</p> <p>Promote use of native, locally appropriate species in plantings.</p>	<p>DM Option 23 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The Option also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Option 24 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity.</p> <p>DM Option 35 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>DM Options 22, 25 and 26 seek to reduce the impact of poor air quality, noise, vibration and lighting on biodiversity assets including designated sites and species.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 7	To improve air quality and reduce noise and vibration	<p>Reduce traffic congestion and car use</p> <p>Promote Considerate Construction Schemes phased construction to reduce the noise, vibration and air quality impacts associated with construction.</p> <p>Current noise levels should be surveyed to establish the current situation. Noise levels should be monitored adjacent to sensitive sites (e.g. dwellings and offices) during development works.</p> <p>Noise complaints should be monitored</p> <p>Considerate constructors schemes should be promoted through policy for all new developments</p>	<p>DM Options 22 seeks to reduce the impact of new development on air quality within Lewisham; only permitting development within AQMAs which will not adversely affect air quality. DM Policy Option 22 also implements restrictions on biomass boilers, Biomass boilers have implications on air quality, however on site renewable energy generation is a key requirement in Core Strategy Policy 8 which will provide further mitigation.</p> <p>DM Option 28 (along with Options 12, 13, 14) promotes car limited development which is likely to reduce vehicle congestion and improve air quality.</p> <p>DM Option 25 seeks to minimise the potential or actual noise pollution and vibration resulting from development by placing conditions on new development.</p> <p>DM Option 16, dealing specifically with provision of restaurants, cafes, and bars, also places conditions on where these developments will be permitted, in order to reduce noise disturbance. Similarly, DM Option 17 dealing with the provision of hot food take-away shops also addresses noise associated with this type of development.</p> <p>Retail and town centre development (including DM Options 12, 13, 14 and 15) through their management of over concentration of specific uses, also indirectly address noise and vibration generation.</p>
Env 8	To reduce car travel and improve accessibility by sustainable modes of transport	<p>Promote car limited development</p> <p>Promote active travel</p> <p>Ensure safe cycle routes and parking is provided</p> <p>Provide adequate walkways and good urban design</p>	<p>DM Option 28 (along with Options 12, 13, 14) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p> <p>Housing policy options including DM Option 4 and 6 promotes the placement of student housing and sheltered housing in close proximity to public transport – a move which will reduce the need for private car use.</p> <p>Core Strategy Policy 14 provides comprehensive sustainable transport policies, which would provide further mitigation for development in Lewisham.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Env 9	To mitigate and adapt to the impact of climate change	<p>Reduce private car use and congestion</p> <p>Promote the use of locally sourced sustainable materials</p> <p>Promote energy efficiency designs in developments for example, solar, wind, passive solar, green roofs, green walls, creation of open space, roof gardens, planting of street trees.</p>	<p>DM Option 28 (along with Options 12, 13, 14) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p> <p>Housing policy options including DM Option 4 and 6 promotes the placement of student housing and sheltered housing in close proximity to public transport – a move which will reduce the need for private car use.</p> <p>DM Option 23 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The Option also encourages the use of green roofs in design to provide biodiversity and landscape/townscape enhancements.</p> <p>DM Option 24 promotes the protection of existing trees and planting of new trees to enhance the aesthetic appeal of open spaces and provide resources for biodiversity. DM Option 34 also encourages the planting of trees and vegetation to enhance the streetscape and public realm.</p> <p>DM Option 35 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>The Core Strategy Policy 8 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Option 21 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM rating. DM Option 21 also promotes the incorporation of passive design measures to manage heating and cooling of buildings – both contributing to energy efficiency.</p> <p>DM Option 21 which encourages the use of green roofs in design will contribute to improving energy efficiency and reducing resource use.</p>
Env 10	To reduce and manage flood risk	Prevent flood risk and surface run off through the implementation of SUDS, greens roofs, roof gardens, open	DM Option 23 promotes the protection and enhancement of biodiversity and provision of high quality open spaces within Lewisham. The Option also encourages the use of green roofs in design. DM Option 24 promotes the protection of existing trees and planting of new trees to enhance the aesthetic

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
		spaces etc	<p>appeal of open spaces and provide resources for biodiversity.</p> <p>DM Option 34 also encourages the planting of trees and vegetation to enhance the streetscape and public realm.</p> <p>DM Option 35 requires development to consider the impact of development on Registered Parks and Gardens within Lewisham.</p> <p>The Core Strategy Policy 8 currently sets standards for new residential and minor and major non-residential development across the borough. In conjunction with this, DM Option 21 requires all conversions, extensions, and refurbishments to attain the highest possible BREEAM Excellent rating.</p>
Env 11	To maintain and enhance landscapes and townscapes	<p>Encourage good urban design</p> <p>Reduce the amount of derelict buildings</p> <p>Reduce the amount of contaminated land</p>	A large proportion of the policy options within the DMLP Further Options promote good urban design (DM Options 29 - 39) and seek to protect the townscape from developments which may detract from its cultural and aesthetic appeal (DM Options 11 – 20). DM Option 27 seeks to manage contaminated land within the borough, contributing to the enhancement of Lewisham's land and townscapes.
Env 12	To conserve and enhance heritage assets and use in the creation of sustainable places.	Conservation of cultural heritage assets.	A number of policy options within the plan deal with protection and management of cultural heritage assets within Lewisham. DM Options 35, 36 and 37 seek to protect cultural heritage assets in Conservation Areas, Listed Buildings, non-designated locally listed buildings, Registered Parks and Gardens, and archaeological assets.
<b>Social</b>			
Soc13	To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home	<p>Provide affordable homes close to sustainable travel opportunities</p> <p>Ensure policies are in place to protect existing housing stock.</p>	<p>DM Option 1 is in line with the NPPF and seeks to promote sustainable development across Lewisham.</p> <p>DM Options 2 – 7, promote the protection of existing housing stock, and provision of student housing, affordable housing, and sheltered housing – all with appropriate health, accessibility and design standards in mind.</p> <p>DM Option 29 and 31, dealing with housing space and design, also seeks to ensure that homes are of a high quality in terms of space, access to</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
			recreational grounds, and health.
Soc 14	To improve the health and well-being of the population and reduce inequalities in health.	Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities, including housing.	<p>Multiple policy options within the DMLP Further Options contribute to equitable health and wellbeing within Lewisham. Housing policy options (DM Options 2 – 7) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.</p> <p>DM Option 17 focuses on restricting take-away shops which will reduce access to unhealthy foods and will contribute to improved health and well-being.</p> <p>Environmental policy options (DM Options 21, 22, 23, 24, 26 and - 27) all contribute to improving Lewisham’s living environment and enabling access to natural areas (which are proven to positively impact a community’s health and wellbeing).</p> <p>DM Option 31, focused on housing design and space standards specifically mention using Lifetimes Homes and Wheelchair Housing standards, where appropriate.</p> <p>DM Option 29, a general design and local character policy, promotes an aesthetically appealing Lewisham which will undoubtedly contribute to community wellbeing.</p> <p>Furthermore, DM Options 40, 41, 42, and 43 promote access to community facilities and services such as community facilities, nurseries and childcare, and places of worship.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Soc 15	To address deprivation, promote social inclusion and ensure equitable outcomes for all communities	Ensure inclusive sustainable affordable access is provided and maintained to all amenities and community facilities, including housing.	<p>Housing policies (DM Options 2 – 7) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.</p> <p>DM Option 23 promotes access for all to Lewisham’s open spaces.</p> <p>DM Option 31, focused on housing design and space standards specifically mention using Lifetimes Homes and Wheelchair Housing standards, where appropriate.</p> <p>DM Options 40, 41, 42, and 43 promote access to community facilities, nurseries and childcare, and places of worship.</p> <p>DM Options 8 – 10 promote local enterprise and employment across various business types within Lewisham. This is likely to combat deprivation and promotes social inclusion.</p>
Soc 16	To provide for the improvement of education, skills and training	Ensure inclusive sustainable affordable access is provided and maintained to all to community facilities.	<p>DM Options 40, 41, 42, and 43 promote access to community facilities, nurseries and childcare, arts and culture and places of worship – all of which provide skills transfer and training to communities.</p> <p>DM Option 10 places a condition on developers to seek contributions to training and/or local employment schemes, regardless of its location, where there is loss of local employment as a result of redevelopment.</p>
Soc 17	To enhance community safety by reducing crime, anti-social behaviour and the fear of crime	<p>Ensure secured by design principles are applied to new developments and refurbishments</p> <p>Promote good urban design</p>	<p>Retail and Town Centre DM Option 11 seeks to incorporate design principles such as active frontages at ground floor and effective street lighting with a view to making the town centre a safer place.</p> <p>DM Option 29 promotes housing design which is safe and secure to reduce crime and the fear of crime.</p>

Ref	Sustainability Appraisal Objectives	Mitigation	Where addressed within the DMLP?
Soc 18	To encourage a sense of community identity, social cohesion and civic participation	Ensure inclusive sustainable affordable access is provided and maintained to all to community facilities.	DM Options 40, 41, 42, and 43 promote access to community facilities, nurseries and childcare, arts and culture and places of worship – all of which help to promote social cohesion and civic participation.
Soc 19	To improve accessibility to leisure facilities, community infrastructure and key local services	Ensure inclusive sustainable affordable access is provided and maintained to all to community facilities.	<p>DM Option 23 promotes access for all to Lewisham’s open spaces.</p> <p>DM Options 40, 41, 42, and 43 promote access to community facilities, nurseries and childcare, and places of worship.</p> <p>Housing policy options (DM Options 4, 5 and 6) promote locating housing for students, the elderly and vulnerable members of the community in areas with easy access to community services.</p> <p>DM Option 28 (along with Options 12, 13, 14, and 15) promotes car limited development and location of shops for essential services within walking distance for local residents. Both measures are likely to reduce reliance on private vehicles.</p>

## 6 Implementation Monitoring

### 6.1 Links to Other Tiers of Plans and Programmes and the Project Level

This SEA/SA has been developed taking account of the aims and objectives of related plans and programmes at the international, European, national, regional and local level. The DMLP provides a basis for development of appropriate design guidance and, in particular, a framework for project-specific applications and where required Environmental Impact Assessment (EIA).

#### 6.1.1 *Proposals for Monitoring*

The SEA Directive requires that “*Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*” (Article 10.1).”

DCLG guidance on SA for DPD states that the SA Report shall include a description of the measures envisaged concerning monitoring and that proposals for monitoring must be considered early in the SA process, included in the SA Report, and reviewed in the light of any responses to consultation.

The London Borough of Lewisham needs to ensure that monitoring information is appropriate to the need of the DMLP, up to date and reliable, and that sources of information are referenced. The SEA Directive specifically requires monitoring to identify unforeseen adverse effects and to enable appropriate remedial action to be taken. It may be difficult to implement monitoring mechanisms for unexpected effects, or to attribute such effects to implementation of the DMLP when they occur. However, in line with European Commission guidance, this provision may be understood as covering effects which differ from those which were predicted, or unforeseen effects which are due to changes of circumstances.

#### 6.1.2 *Monitoring Process*

The results of monitoring will be provided by the London Borough of Lewisham as part of the process of annual reporting on Local Plan progress. Contingency procedures will be developed to identify and address poor performance against objectives or unforeseen adverse impacts of the DMLP.

Table 6-1 sets out a proposed list of monitoring activities currently being considered. The following set of SA monitoring indicators along with the DMLP monitoring indicators set out have been selected in combination to monitor the performance of the DMLP.

By reviewing and monitoring the Plan the Council will be able to consider:

- The impact that the Plan is having in helping to achieve national, regional and local targets;

- Whether the policies are working effectively, or require adjusting; and
- Whether any wider national or regional strategy or policy changes require a change to the Plan.

This may be revised prior to adoption of the DMLP. Any changes to proposed monitoring and responsibilities that arise as a consequence of the proposed submission version and examination will be set out in the SA Adoption Statement.

FOR CONSULTATION

Table 6-1 Monitoring

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
<b>Social</b>					
Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property Prices (£)	Borough-wide only	Land Registry	Annual
		Proportion of rented accommodation (number of renting households)	Borough-wide only	LBL	3yrs
		Number of people applying for statutory homelessness	n/a	LBL	Annual
		Number of homeless applications accepted	n/a	LBL	Annual
		Number of households in temporary accommodation	n/a	LBL	Annual
		% of affordable housing	n/a	LBL	Annual
		Increase supply of new homes	n/a	LBL	Annual
		Number and percentage of dwellings by bedroom size	n/a	LBL	Annual
		Net additional pitches (Gypsy and Traveller)	n/a	LBL	Annual
Decent homes	To increase the provision of housing that meets decent homes standards	% of local authority houses designated as non-decent (number of dwellings)	n/a	LBL	3yrs
		% of new residential accommodation completed to lifetime homes standards	n/a	LBL	3yrs
Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	Numbers of the members of the public who attend council organised river activities?	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		Amount of new schemes increasing access to river	n/a	LBL	Annual
Community facilities	To increase the provision of accessible and inclusive everyday facilities	Funding secured through planning obligations for infrastructure, facilities, services and employment and training	n/a	LBL	Annual
Heritage	To protect and enhance heritage buildings	Levels of investment in retaining and maintaining list buildings	n/a	LBL	Annual
		Condition of listed building in the local area	n/a	LBL	Annual
		Number of listed buildings and scheduled monuments on the 'at risk' register	n/a	LBL	Annual
		No. of conservation areas covered by up-to date CA appraisals and management plans	n/a	LBL	Annual
		No. of planning permissions granted for buildings in protected vistas, the London Panorama, and local views and panoramas	n/a	LBL	Annual
		Number of planning applications in buffer zones of Scheduled Ancient Monuments, Heritage Sites etc	n/a	LBL	Annual
Culture	To protect and enhance cultural diversity	Numbers of the members of the public who attend council organised river activities?	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Crime	To reduce crime levels in the town centre	Gains and losses of community and recreational facilities completed	n/a	LBL	Annual
		Number of offences per 1000 of population Detailed indicators for the following: - violence against person - burglaries - robberies - violent crime - sexual offences	n/a	London Metropolitan Police	Annual
Education	To increase access to lifelong learning	Adult education provision	n/a	LBL	Annual
		% pupils receiving 5 or more GCSEs at grades A* to C equivalent	Borough wide only	LBL	Annual
		Participation of 16-18 year olds in education and training	Borough wide only	LBL	Annual
		Amount of apprentice schemes coordinated with local colleges	n/a	LBL	Annual
Social inclusion	To improve access to amenities for vulnerable members of the community.	% of population with access to services by walking / public transport (borough wide)	Borough wide only	LBL	Annual
		Number of shop mobility schemes	n/a	LBL	Annual
Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population / Serious or fatal) Detailed indicators could include: - number of road accidents with people slightly injured	Borough wide only	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Health	To improve inclusive access to local healthcare facilities	% respondents in 'good health'	Borough wide only	Census	10 year
		Life expectancy (years)	Borough wide only	National Health Service (NHS)	Annual
		Infant mortality rates	Borough wide only	NHS	Annual
		Mortality ratio	Borough wide only	NHS	Annual
		% of people with lifelong limiting illnesses	Borough wide only	NHS	Annual
Noise	To reduce noise from road traffic, construction and industry	Number of complaints related to noise from: Roads, Construction, Maintenance, Noisy neighbours and Other	n/a	LBL	Annual
Open space	To increase the quality and provision of publicly accessible open spaces	ha of accessible open space per 1000 population	Borough wide	LBL	2010
		Gain and Loss of open space	n/a	LBL	Annual
<b>Environmental</b>					
Effects of climate change	To reduce the risk and effects of flooding	Number of people and properties affected by fluvial flood incidents.	n/a	Environment Agency	Annual
		Length of river restored and amount of restoration projects	n/a	LBL	Annual
		Amount of planning permissions granted contrary to advice of Environment Agency	n/a	LBL	Annual
		Number of approved developments which incorporate SUDS	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		Number of flood prevention schemes	n/a	LBL	Annual
Sustainable transport	To reduce dependency on private cars	Proportion of people going to work by different means i.e. private car, cycle, walk, bus, train, underground etc.	n/a	Census	10 year
		Percentage of completed non-residential development complying with car-parking standards	n/a	LBL	Annual
		Percentage of residents surveyed using different modes of transport, reasons and distance travelled.	n/a	Census	10 year
		Number of car clubs and bays in the borough	n/a	LBL	Annual
		Number of completed car free or car limited development	n/a	LBL	Annual
		Electric car charging points	n/a	LBL	Annual
		% of permitted major developments with travel plans	n/a	LBL	Annual
		Cycle parking	n/a	LBL	Annual
Renewable energy	To increase on-site renewable energy provision	Per capita reduction in CO2 emissions	Borough wide only	LBL	Annual
		Renewable energy generation	n/a	LBL	Annual
		Provision of decentralised energy	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Energy efficiency	To increase the energy efficiency performance of existing buildings	% of new developments and refurbishments accredited to BREEAM excellent or other rating	n/a	LBL	Annual
		% CO2 energy savings from new developments	n/a	LBL	Annual
		Compliance with CSH (code for sustainable homes)	n/a	LBL	Annual
Waste and recycling	To increase the amount of waste recycling	kg of household waste per head per year	n/a	LBL	Annual
		% household waste recycled	n/a	LBL	Annual
		Number so Site Waste Management Plans submitted with planning applications	n/a	LBL	Annual
Water use	To provide sustainable sources of water	Water loss through leakages	n/a	Thames Water	Annual
		% of dwellings that have a water meter	n/a	Thames Water	
Air quality	To improve air quality	Air pollution levels of Fine Particles, Nitrogen Oxide, Carbon Monoxide, Ozone and Benzene	n/a	LBL	Annual
		Number of Local Air Quality Management Areas (LAQMA)	n/a	LBL	Annual
Biodiversity	To value, protect and enhance biodiversity	Achievement of Biodiversity Action Plan Targets	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
		Number of tree planting schemes	n/a	LBL	Annual
		Number of council owned Green/open spaces with an agreed management plan in place	n/a	LBL	Annual
		The number of parks achieving Green Flag status	n/a	LBL	Annual
		Percentage of parks that are fully accessible	n/a	LBL	Annual
		Number of biodiversity enhancements schemes	n/a	LBL	Annual
		Number of completed living roofs and walls	n/a	LBL	Annual
		Number of applications within Sites of Importance for Nature Conservation (SINC) granted or refused planning permission	n/a	LBL	Annual
		Change in areas and populations of biodiversity importance	n/a	LBL	TBC
<b>Economic</b>					
Retail offer	To increase the diversity of the retail offer	Retail floorspace	n/a	LBL	Annual
		% non-retail uses in primary shopping frontages	n/a	LBL	Annual
		Number of different retail functions and types accommodated in the area	n/a	LBL	Annual

Topic	Sustainability Appraisal Objectives	Indicators	Comments	Monitoring Responsibility	Timescale
Evening economy	To encourage a vibrant, well-managed evening economy	Evening Economy - available floorspace	n/a	LBL	Annual
Local business	To increase density of local business	Number of new businesses in the area	n/a	LBL	Annual
		Vacancy rates	n/a	LBL	Annual
		Amount of completed retail, office and leisure development	n/a	LBL	Annual
Employment opportunities	To increase access to local employment	% of population of working age who claim unemployment benefit by age	n/a	Census	10 years
		Number of years unemployed by age?	n/a	Census	10 years
		Total amount of additional employment floorspace – by type Losses of employment land No net loss of B use class floor space in defined employment land areas (Strategic Industrial Location (SIL), Local Employment Location (LEL), Mixed Use Employment Location (MEL))	n/a	LBL	Annual

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<sup>i</sup> London Borough of Lewisham Sustainability Scoping Report 2005

<sup>ii</sup> Issues and Options Report 2005

<sup>iii</sup> Preferred Option Report 2007

<sup>iv</sup> Sustainability Appraisal of the Preferred Options 2007

<sup>v</sup> Scoping report for Sustainability Appraisal and Strategic Environmental Assessment of Development Management DPD, November 2011 (London Borough of Lewisham) - <http://www.lewisham.gov.uk/myservices/planning/policy/Documents/DMScopingReportFinalNov2011.pdf>

<sup>vi</sup> European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the Strategic Environmental Assessment or ‘SEA Directive’)

<sup>vii</sup> A Practical Guide to the Strategic Environmental Assessment Directive - ODPM Sept 2005

## Appendix A – Plans, Policies and Programmes

FOR CONSULTATION

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
INTERNATIONAL			
<p>1.8 Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</p>	<p>1.9 Contains the key obligation requiring the reduction in anthropogenic CO2 levels</p> <p>1.10 Target: To reduce emissions by 5% of 1990 levels by 2008/12. UK target to reduce emissions by 12.5% below 1990 levels by 2008/12.</p>	<p>1.11 The Protocol provides a clear recognition of the importance of minimising greenhouse gas emissions and the need for emission considerations to feature in policy making.</p>	<p>1.12 Supporting programme.</p>
<p>The World Summit on sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) 2002 Status: Statutory</p>	<p>1.13 Adopts a 10-year framework of programmes of action seeking to accelerate the shift towards sustainable consumption and production and reverse the trend in the loss of natural resources and biodiversity by 2010.</p>	<p>1.14 The DPD should support the sustainability aims of Agenda 21 at the local level by reducing impacts on the environment and increasing the use of renewable energy sources.</p>	<p>1.15 Supporting programme.</p>
<p>1.16 Convention concerning the Protection of the World Cultural and Natural Heritage (1972) (UNESCO)</p>	<p>1.17 Article 5 – To ensure that effective and active measures are taken for the protection, conservation and presentation of cultural and natural heritage ... and to adopt a general policy which aims to give the cultural and natural heritage a function</p>	<p>1.18 The DPD will need to recognise the effect of the convention in relation to the protection of Lewisham’s cultural and natural heritage. This is reflected through national planning guidance.</p>	<p>1.19 Supporting programme.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes.		
<b>EUROPEAN UNION</b>			
<p>1.21 European spatial declaration on sustainable development</p> <p>1.22 Proponent body European Union</p> <p>1.23 1999, Status: voluntary</p>	<p>1.24 The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>1.25 Re-affirmed UK commitment to sustainable development.</p>	<p>1.26 Supporting programme.</p>
<p>1.27 European Spatial Development Perspective (ESDP) (1999)</p>	<p>1.28 ESDP aims to ensure that the three fundamental goals of European policy are achieved equally in all the regions of EU:</p> <ul style="list-style-type: none"> <li>• economic and social cohesion</li> <li>• conservation and management of natural resources and the cultural heritage</li> <li>• more balanced competitiveness of the European territory</li> </ul>	<p>1.29 DM DPD should seek to maximise resource sustainability and respect and preserve the existing historical and cultural landscape of Lewisham as far as possible. The DPD achieves this through the ongoing protection of the borough's conservation areas and policies promoting sustainable design.</p>	<p>1.30 The SA should include objectives and criteria related to protecting and enhancing historic and cultural heritage and reducing greenhouse gas emissions. The contribution to the form and function of the urban areas of the borough should be viewed positively and the plan's objectives should reflect this.</p>
<p>1.31 EU Sustainable Development</p>	<p>1.32 Environmental objectives and</p>	<p>1.33 The DPD will need to recognise</p>	<p>1.34 SA objectives should ensure</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Strategy (2001)	<p>priorities derived from the EU Sixth Environmental Action Programme focus on:</p> <ul style="list-style-type: none"> <li>• limiting climate change and increasing the use of clean energy</li> <li>• addressing threats to public health (e.g. hazardous chemicals, food safety)</li> <li>• combating poverty and social exclusion</li> <li>• dealing with the economic and social implications of an ageing society</li> <li>• managing natural resources more responsibly (including biodiversity and waste generation)</li> <li>• improving the transport system and land use management.</li> </ul>	the need to achieve social and economic cohesion and the need to foster the conservation and management of historical assets and the natural environment	criteria related to economic and social cohesion, protecting and enhancing historic and cultural heritage, and reducing greenhouse gas emissions are reflected.
1.35 European Community Biodiversity Strategy 1998	1.36 Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).	1.37 The DM DPD must seek to protect and enhance biodiversity levels in the borough.	1.38 The SA objectives should include the protection and enhancement of biodiversity.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>1.39 Sixth Environment Action Programme of the European Community 2002 - 2012</p> <p>1.40 Status: voluntary</p>	<p>1.41 The programme identifies four environmental areas for priority actions:</p> <ul style="list-style-type: none"> <li>• climate change</li> <li>• nature and biodiversity</li> <li>• environment and health and quality of life</li> <li>• natural resources and waste</li> </ul>	<p>1.42 The DM DPD should seek to address these priority areas for action.</p>	<p>1.43 Supporting programme.</p>
<p>1.44 Directive 2008/50/EC on ambient air quality and cleaner air for Europe (2008)</p>	<p>1.45 New air quality objectives for PM2.5 (fine particles) including the limit value and exposure related objectives – exposure concentration obligation and exposure reduction target.</p>	<p>1.46 The DPD should address air quality</p>	<p>1.47 The appraisal framework requires an objective relating to air quality, attainable targets, and recognised indicators that will allow for progress to be effectively monitored.</p>
<p>1.49 European Directive on Ambient Air Quality Assessment and Management (96/62/EC)</p>	<p>1.50 The Directives aim to reduce specified air pollutants.</p> <p>1.51 Targets: The exceedence limits have been translated into UK law in Air Quality Regulations.</p>	<p>1.52 Recognition of need to be aware that the location of development can have a direct effect on improving air quality.</p>	<p>1.53 The appraisal framework requires an objective relating to air quality, attainable targets, and recognised indicators that will allow for progress to be effectively monitored.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>1.55 European Directive on Establishing a Scheme for Greenhouse Gas Allowance Trading (2003/87/EC)</p>	<p>1.56 Introduces a European wide emissions trading scheme.</p> <p>1.57 Targets: To reduce emissions by 8% by 2008/12 of 1990 levels, and reduce global emissions by approximately 70% of 1990 levels.</p>	<p>1.58 DPD should focus on reducing greenhouse gas emissions to reduce the boroughs overall carbon footprint in all planning related areas.</p>	<p>1.59 The SA objectives must reflect the carbon reduction targets detailed in the Directive and other national legislation.</p>
<p>1.60 Directive 2009/29/EC amending Directive 2003/87/EC so as to improve and extend the greenhouse gas emission allowance trading scheme of the Community (2009)</p>	<p>1.61 Improves and extends the EU ETS for Phase III with the introduction of a centralised, EU-wide cap on emissions, new sectors and gases, and harmonised rules on free allocation with a move toward greater auctioning of allowances.</p>	<p>1.62 DPD should focus on reducing greenhouse gas emissions to reduce the boroughs overall carbon footprint in all planning related areas.</p>	<p>1.63 The SA objectives must reflect the carbon reduction targets detailed in the Directive and other national legislation.</p>
<p>1.64 European Directive on Landfill (99/31/EC)</p>	<p>1.65 The Directive is intended to prevent or reduce the adverse effects of the landfill of waste on the environment, in particular on surface water, groundwater, soil, air and human health.</p> <p>Targets: The targets have been</p>	<p>1.67 The DPD policies should aim to reduce waste generation by implementing the waste hierarchy.</p>	<p>1.68 The SA objectives must aim to minimise waste generation and maximise sustainable waste management in the borough.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	d into UK law.		
1.69 European Waste Framework Directive (75/442/EEC, as amended in 1991)	<p>1.70 The Directive seeks to reduce the quantity of waste going to landfill and introduces the waste hierarchy of prevention, reuse, recycle, recovery, disposal.</p> <p>1.71 Targets: Reduce waste going to final disposal by 20% from 2000 to 2010, and by 50% by 2050, with special emphasis on cutting hazardous waste.</p>	1.72 The DPD policies must seek to implement the waste hierarchy in order to meet the required target for waste minimisation.	1.73 The SA objectives must aim to reduce the amount of waste requiring final disposal. Indicators and targets are required for the proportion of waste reused/recycled/recovered.
1.74 European Directive on the Conservation of natural habitats and of wild fauna and flora (The Habitats Directive 92/43/EEC)	1.75 Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species.	1.76 The DPD will need to maintain or restore designated natural habitat types, and habitats of designated species; preserve linear structures (rivers/ streams/ hedgerows/ field boundaries etc) that enable movement and migration of species. Requirement to include an Appropriate Assessment at preferred options stage and policies to protect listed species and habitats.	1.77 The SA objectives must aim to minimise the impact on natural habitats.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.78 European Directive on Conservation of Wild Birds 1979 (79/409/EEC)	1.79 The maintenance of the favourable conservation status of all wild bird species across their distributional range.	1.80 The DPD will need to take measures ensure there is sufficient habitat area and habitat diversity for wild birds.	1.81 SA objectives must aim to preserve habitats for birds..
1.82 European Water Framework Directive (2000/60/EC)	1.83 To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe's waterways. Target: Member States to produce River Basin Management Plans by 2009 and to achieve the environmental objectives by 2016.	1.85 The DPD is required to ensure the protection and enhancement of water courses and reduce urban wastewater discharge into the river systems.	1.86 Supporting programme.
1.87 EU Sixth Environmental Action Plan (2002)	1.88 The Plan seeks a high level of protection of the environment and human health and for general improvement in the environment and quality of life.	1.89 The DPD should include robust policies at protecting and enhancing the overall environment in the borough.	1.90 SA objectives must include measures aimed at improving overall environmental quality.
<b>NATIONAL</b>			
1.92 Environmental Assessment of Plans & Programmes Regulations	1.94 Transposes the SEA directive into	1.95 Given effect through PPS12 and	1.96 The SA structure and content must reflect that outlined in the

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
2004  1.93 Status - Statutory	UK law.	Sustainability Appraisal of LDF.	regulations and associated guidance note
1.97 Town and Country Planning (Local Development) (England) Regulations 2004 as amended and the Town and Country Planning (Local Planning) (England) Regulations 2012	1.98 The Act provides the statutory planning framework for England.	1.99 Clause 38 places a duty on local authorities to contribute to the achievement of sustainable development. The local planning authority is required to produce a sustainability appraisal to accompany certain planning documents.	1.100 The SA structure and content must reflect that outlined in the regulations and associated guidance note
1.101 Town and Country Planning Act 1990  1.102 Status - Statutory	1.103 Sets out the procedures for the preparation, approval and adoption of DPDs and for the control of development.	1.104 Certain parts of the Act need to be adhered to in preparing the LDF.	1.105 Although not directly relevant the SA needs to comply with legislative requirements.
1.106 Planning and Energy Act 2008	1.108 An Act to enable local planning authorities to set requirements for energy use and energy efficiency in local plans.	1.109 The DPD can include policies aimed at increasing the proportion of energy generated from renewable energy sources.	1.110 The SA objectives should include measures to mitigate against the effects of climate change.
1.111 Energy Act 2008, Status	1.112 Among other energy matters, this Act makes provision for electricity	1.113 The legislation provides an enabling mechanism for the DPD to make provision for decentralised renewable	1.114 The SA objectives should include measures to mitigate against

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	generated from renewable sources.	energy generation.	the effects of climate change.
1.115 The Town and Country Planning (Use Classes) Amendment Order 2005	1.117 Two new use classes are introduced - A4 Drinking Establishments and A5 hot food take-aways.	1.118 The DPD can seek to control the concentration of these uses in the borough in order to enhance the borough's character.	1.119 The SA objectives should include measures aimed at encouraging economic growth, employment and new enterprises.
1.120 UK Climate Change Act (2008)	1.121 The Act creates a new approach to managing and responding to climate change in the UK. Targets: 80% cut in greenhouse gas emissions by 2050 - lower than 1990 baseline.	1.122 The DPD should reflect objectives for climate change mitigation and adaptation	1.123 The sustainability objectives should consider climate change to ensure that the Site Allocations DPD contributes to the target.
1.124 UK Strategy for sustainable development	1.125 Living within environmental limits. Ensuring a strong, healthy and just society. Achieving a sustainable economy. Promoting a good governance and using sound science reasonably.	1.126 These objectives must be considered in the allocation of sites	1.127 The objectives have been used to develop the sustainability objectives
1.128 The Localism Act 2011	1.130 The Localism Bill contains a number of proposals to give local authorities new freedoms and flexibility. It sets out a series of proposals with the potential to	1.131 The DPD will need to ensure complete compliance with the Localism Act	1.132 Although not directly relevant the SA needs to comply with legislative requirements.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>achieve a substantial and lasting shift in power away from central government and towards local people. They include: new freedoms and flexibilities for local government; new rights and powers for communities and individuals; reform to make the planning system more democratic and more effective, and reform to ensure that decisions about housing are taken locally.</p>		
<p>1.133 National Planning Policy Framework (NPPF) March 2012</p>	<p>1.135 The NPPF is a key part of national government reforms to make the planning system less complex and more accessible, to protect the environment and to promote sustainable growth.</p>	<p>1.136 The DPD will need to ensure complete compliance with all elements of the NPPF</p>	<p>1.137 The SA objectives must seek consistency with the NPPF</p>
<p>1.138 PPS10 Planning for sustainable waste management</p>	<p>1.139 Sets out the Government's policies on sustainable waste management and provides guidance on LDF preparation and on determining planning applications.</p>	<p>1.140 The DPD will need to address the requirement for sustainable waste management. In particular it will have to help ensure that facilities to allow the collection and treatment of waste are in place whilst ensuring that essential facilities are located appropriately and</p>	<p>1.141 The SA objectives must seek to minimise waste generation and increase recycling.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
		any environmental impacts are minimised.	
1.142 Community Infrastructure Levy: An overview	1.143 The Community Infrastructure Levy (CIL) is a new charge which local authorities in England and Wales will be empowered, but not required, to levy on most types of new development in their areas. The proceeds of the levy will provide new local and sub-regional infrastructure to support the development of an area in line with local authorities' DPDs.	1.144 Infrastructure planning is fundamental to the delivery of the borough's vision. The DPD should support the implementation of CIL.	1.145 THE SA needs to highlight the need for partnership working to improve the delivery and provision of infrastructure (physical, social and green) in response to the needs of the local communities.
1.146 By Design: Urban Design in the planning system 2000	1.147 Sets out the Government's aim to encourage better urban design.	1.148 The DPD should include policies promoting good urban design that is relevant to the local context.	1.149 SA objectives must include those promoting sustainable urban design.
1.150 Planning and access for disabled people: A good practice guide 2003	1.151 The guide aims to improve accessibility levels for disabled people by the adoption of appropriate urban design strategies.	1.152 The DPD should address accessibility for people with disabilities both in the public realm and proposed developments to maximise social inclusion.	1.153 The SA objectives must include measures that improve accessibility for all people in the community.
1.154 Delivering choosing health:	1.156 Highlights how the DH and the NHS	1.157 The DPD will need to include	1.158 The SA must identify

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
making healthier choices easier (2005) (Department of Health)	will help more people make more healthy choices and reduce health inequalities. Outlines clearly the priorities for delivery at national, regional and local levels and what will be done by whom and when. It brings into one place all of the actions on the White Paper commitments, alongside related Public Service Agreements and local targets to improve health.	policies that encourage healthy lifestyles and reduce health inequalities were appropriate	opportunities to enhance and mitigate health inequalities.
1.159 Homes for the future – more affordable, more sustainable	1.160 Everyone had the right to a decent homes at a price which they can afford, in a location where they would like to live and work.	1.161 The allocation of housing land should be based on the principles of Homes for the Future.	1.162 The sustainability objectives must reflect access to affordable housing.
1.163 UK Air Quality Strategy 'Working together for clean air'	1.164 Everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.	1.165 Local authorities are encouraged to develop their own strategies and advice on air quality.	1.166 The SA objectives must include measures that aim to improve ambient air quality in the borough.
1.167 Energy White Paper 2003 Our energy future: creating a low-carbon economy (2003)	1.169 The national energy policy has five key goals: 1.170 - to put ourselves on a path to cut	1.175 The DPD can include policies aimed at increasing the proportion of energy generated from renewable energy	1.176 The SA objectives should include measures to promote renewable energy and create a low

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>the UK's carbon dioxide emissions – the main contributor to global warming – by some 60% by about 2050, with real progress by 2020</p> <p>1.171 - to maintain the reliability of energy supplies</p> <p>1.172 - to promote competitive markets in the UK and beyond, helping to raise the rate of sustainable economic growth</p> <p>1.173 - to improve our productivity</p> <p>1.174 - to ensure every home is heated adequately and affordably</p>	sources.	carbon economy.
1.177 National Waste Strategy for England (House of Commons Environment, Food and Rural Affairs Committee, 2007)	<p>1.178 The Strategy seeks to:</p> <ul style="list-style-type: none"> <li>• Reduce waste by making products with fewer natural resources</li> <li>• Break the link between economic growth and waste growth</li> <li>• Most products should be used or their</li> </ul>	1.179 The DPD should ensure provision is made to ensure waste reduction and reuse.	1.180 An objective for waste should be included in the sustainability objectives.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>materials recycled</p> <ul style="list-style-type: none"> <li>• Energy should be recovered from other wastes where possible</li> </ul>		
<p>1.181 Safer Places: The Planning System and Crime Prevention (ODPM, 2004)</p>	<p>1.183 Focuses on seven attributes of sustainability that are particularly relevant to crime prevention. The attributes are general and descriptive. They are not prescriptive. Instead, they should be considered as prompts to thinking about crime prevention and promoting community safety through the planning system.</p>	<p>1.184 The DPD should promote safe town centres through policy.</p>	<p>1.185 The SA should include objectives to enhance safety.</p>
<p>1.186 Healthy Weight, Healthy Lives: A Cross-Government Strategy for England (Cross government strategy led by the Department of Health and DCSF) 2008</p>	<p>1.188 The first step in a sustained programme to reduce obesity and support people to maintain a healthy weight. It brings together employers, individuals and communities to promote children's health and healthy food; build physical activity into our lives; support health at work; provide incentives to be healthy; and provide effective treatment and support if people become overweight or obese.</p>	<p>1.189 The DPD will need to include policies that encourage healthy lifestyles and reduce health inequalities where appropriate</p>	<p>1.190 The SA must identify opportunities to enhance and mitigate health inequalities.</p>
<p>1.191 The Flood and Water</p>	<p>1.192 Addresses the threat of flooding</p>	<p>1.193 The DPD should address all</p>	<p>1.194 The SA should include</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Management Act 2010	and water scarcity. The Act updates the Reservoirs Act 1975 and reflects a more risk-based approach to reservoir regulation	flooding issues	objectives to flood prevent flood risk
1.195 Environment Agency, Creating a better place strategy 2010-2015	1.196 The strategy shows how the EA will work in specific areas to achieve its aims relating to biodiversity, climate change, flood risk, creating sustainable places and waste management.	1.197 The DPD should ensure issues relating to biodiversity, climate change, flood risk, creating sustainable places and waste management are adequately addressed as part of the site allocation and development management process.	1.198 The SA objectives should include a measures aimed at positively addressing biodiversity, climate change, flood risk, creating sustainable places and waste management.
1.199 Thames Catchment Flood Management plan and TE2100 Plan	1.200 Provides an overview of flood risk in the Thames catchment and sets out our the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	1.201 The DPD needs to ensure flood risk is addressed and appropriately managed.	1.202 The SA objectives should include a measure to address and manage flood risk.
1.203 Thames River Basin Management Plan (2009)	1.204 The Plan is about the pressures facing the water environment in this river basin district, and the actions that will address them. Targets include, by 2015, 22% of surface waters (rivers, lakes estuaries and coastal waters) are going to improve for at least one biological,	1.205 The DPD should ensure water quality can be managed and improved as part of site development.	1.206 The SA objectives should address water quality.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	chemical or physical element; 25% of surface waters will be at good or better ecological status; and 17% of groundwater bodies will be at good overall status by 2015.		
<b>REGIONAL - London</b>			
1.208 The Mayor's Air Quality Strategy (2010)	1.209 The Strategy concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem. Targets: Reduction in NO <sub>2</sub> and PM <sub>10</sub> .	1.210 The DPD should include a policy aimed at improving air quality in line with that in the London Plan and the Council's own Air Quality Management Plan.	1.211 The SA objectives should include a measure aimed at improving air quality.
1.212 The Mayor's Economic Development Strategy (2010)	1.213 The strategy sets out to encourage the expansion of opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life.	1.214 The DPD should include policies that promote employment and actively engage in London's economic growth.	1.215 The SA objectives should include measures that seek to encourage sustainable economic growth.
1.216 The Mayor's Biodiversity Action Plan (2002)	1.217 This Strategy sets policies and proposals to protect and care for London's biodiversity by encouraging the greening of the built environment and the use of open	1.218 The DPD should include policies that protect wildlife habitat and recognise opportunities for enhancement of	1.219 The SA objectives should contain measures that seek to protect and enhance biodiversity.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	spaces in ecologically sensitive ways.	biodiversity in the borough.	
1.220 London Biodiversity Action Plan and London Biodiversity Partnership (est. 1996)	1.222 The London Biodiversity Action Plan (BAP) identifies priority habitats that are of particular importance for biodiversity in London. The London Biodiversity Partnership brings together organisations to benefit wildlife and boost the capital's greenspaces.	1.223 The DPD should seek to enhance and protect biodiversity.	1.224 The SA objectives should seek to protect and enhance biodiversity.
1.225 The Mayor's Cultural Strategy (2010)	1.226 The Strategy sets out the Mayor's proposals for developing and promoting cultural life in London.	1.227 The collective DPD policies should aim to improve the cultural and social aspects of life in the borough.	1.228 The collective SA objectives should aim to ensure the enhancement of cultural and social growth.
1.229 London Climate Change Adaptation Strategy (2008)	1.230 Presents adaptation measures to address climate change within London.	1.231 The DPD policies should seek to ensure relevant adaptation is done at the local level to support the strategy.	1.232 The SA objectives should be underpinned by the overriding objective of reducing impacts and adapting to effects of climate change.
1.233 The draft climate change adaptation strategy for London: Public Consultation Draft (Greater London	1.235 The aim of the London Climate Change	1.237 The DPD policies should seek to ensure relevant adaptation is done at the	1.238 The SA objectives should be underpinned by the overriding objective of reducing impacts and

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Authority, February 2010)	1.236 Adaptation Strategy is to assess the consequences of climate change on London and to prepare for the impacts of climate change and extreme weather to protect and enhance the quality of life of Londoners.	local level to support the strategy.	adapting to effects of climate change.
1.239 The Mayor's Transport Strategy (2011)	1.240 Details priority areas for transport that directly or indirectly, benefit the environment and the London community.  1.241 Targets: Increase in rail capacity and cycling	1.242 The DPD policies should aim to complement the transport priorities for action set out in the Strategy.	1.243 SA objectives should contain measures that seek to reduce the need for car travel and encourage sustainable modes of transport.
1.244 London Plan (2011)	1.245 The overall strategic plan for London. Sets out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It forms part of the development plan for Greater London. London boroughs' local plans need to be in general conformity with the London Plan, and its policies guide decisions on planning	1.246 The DM DPD should reflect emerging policy, which represents current thinking.	1.247 The sustainability objectives should reflect the Integrated Impact Assessment of the emerging London Plan.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	applications by councils and the Mayor.		
1.248 The Mayors Draft Municipal Waste Management Strategy: London's Wasted Resource (2010)	1.249 The aim is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance, and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.	1.250 The DPD should contain a policy on waste management that ensures compliance with the London Plan and also ensures that the objectives of the waste hierarchy.	1.251 The SA objectives must include measures that seek to reduce waste production and sustainably manage waste.
1.252 Streets For All: A Guide to the management of London's Streets (English Heritage, 2000)	1.254 Purpose is to make the streets of London attractive, safe and enjoyable spaces for people. It builds on the 1999 report of the Urban Task Force Towards an Urban Renaissance and forms an important part of the work of EH and the other co-sponsors to secure access for all and sustainable community regeneration.	1.255 Good urban design and safety should be addressed within the DPD	1.256 The SA objectives should include urban design and safety

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.257 London Housing Strategy (2010)	1.258 Raise aspirations and promote opportunity: by producing more affordable homes, particularly for families, and by increasing opportunities for home ownership; Improve homes and transform neighbourhoods: Targets: Targets are reflected within London Plan	1.259 The DPD should support the strategy's objectives relating to housing provision, design and energy efficiency.	1.260 Sustainability objectives should consider the quality and affordability of housing supply.
1.261 Health and Urban Planning Toolkit – NHS London Healthy Urban Development Unit (2010)	<p>1.263 To assist PCTs and LPAs improve joint working to enable health to be addressed through the planning system.</p> <p>1.264 <i>Aims for PCTs</i> - strengthen understanding of the ways in which the wider determinants of health can be enhanced through effective planning policies and the ways in which planning for health services and plans for the physical development of boroughs can be integrated.</p> <p>1.265 <i>Aims for boroughs</i> - strengthen the common understanding of the ways in which the wider determinants of health can</p>	1.266 The DPD will need to include policies that encourage healthy lifestyles and reduce health inequalities were appropriate	1.267 The SA must identify opportunities to enhance and mitigate health inequalities.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	be enhanced through effective spatial planning policies.		
1.268 Souder City: The Mayor's Ambient Noise Strategy (2004)	1.269 Minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practises and technology. Targets: Targets are reflected within the London Plan	1.270 Protect noise sensitive land uses from noisy development and activities.	1.271 The SA objectives should include measures to minimise adverse effects of noise by separating incompatible land uses or mitigating against existing impacts.
1.272 Mayor of London 'Green Light to Clean Power' Energy Strategy (2004)	<p>1.274 The Strategy's specific aims are:</p> <p>1.275 - reducing London's contribution to climate change by minimising emissions of carbon dioxide from all sectors (commercial, domestic, industrial and transport) through energy efficiency, combined heat and power, renewable energy and hydrogen</p> <p>1.276 - helping to eradicate fuel poverty by giving Londoners, particularly the most vulnerable groups, access to affordable warmth</p>	1.278 The DPD can include policies aimed at increasing the proportion of energy generated from renewable energy sources.	1.279 The SA objectives should include measures to promote renewable energy and create a low carbon economy.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	1.277 - contributing to London's economy by increasing job opportunities and innovation in delivering sustainable energy, and improving London's housing and other building stock.		
1.280 Connecting Londoners with Trees and Woodlands: A Tree and Woodland Framework for London (2005)	1.282 Plant the right trees in the right places to enhance the environment and quality of life.	1.283 The DPD can facilitate the protection and provision of trees.	1.284 Sustainability objectives should relate to landscape features, including trees.
1.285 The London Rivers Action Plan (2009)	1.286 Identifies the Ravensbourne River for naturalisation. Targets: Supports the London Plan's biodiversity target to restore 15km of river (across London) by 2015, and supports the implementation of London Plan blue Ribbon policies.	1.287 The DPD should ensure river restoration is facilitated through the development process where relevant and access to rivers is maintained and provided.	1.288 Sustainability objectives should cover river restoration, access to rivers and an acknowledge the positive role rivers and river restoration play in biodiversity, climate change and flood risk management.
LOCAL - Lewisham			
1.290 Lewisham Unitary Development	1.291 The UDP sets out the Council's	1.292 The DPD should enable saved	1.293 SA objectives should be

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Plan (2004)	statutory planning policies.	UDP policies to be incorporated where relevant.	used to appraise all DPD policies that can lead to saved UDP policies from being included in the LDF.
1.294 Lewisham Core Strategy (June 2011)	1.295 The Core Strategy provides the spatial planning framework for the borough and is underpinned by five strategic objectives: <ul style="list-style-type: none"> <li>• Regeneration and growth areas</li> <li>• Providing new homes</li> <li>• Growing the local economy</li> <li>• Environmental management</li> <li>• Building a sustainable community</li> </ul>	1.296 The DPD needs to support the implementation of the Core Strategy.	1.297 The SA should seek for the DPD to primarily avoid, and secondarily minimise and compensate for, any significant negative effects on the community, in social and economic terms, or the environment.
1.298 Lewisham Sustainable Community Strategy (SCS) 2008-2020	1.299 The SCS sets out the vision for the borough up until 2020 and includes objectives to improve social, environmental and economic outcomes for the borough. The SCS is critically important when formulating the Core Strategy's vision for the borough.	1.300 The DPD vision should be informed by that of the SCS. The DPD also needs to be in broad conformity with the SCS objectives.	1.301 The SA objectives will appraise all elements of the DPD including the vision which is derived from the SCS.
1.302 Community Safety Strategy	1.303 This plan sets out the results of the	1.304 DPD policies should aim to	1.305 The SA objectives should

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
(2008-2011) (SCS), Safer Lewisham Plan (2009-10)	Strategic Assessment which identifies the key crime and disorder issues that face the borough, and the multi-agency actions that will be deployed to address them.	improve community safety by design and seek to improve education, economic growth and employment levels in the borough which will reduce the drivers of crime.	contain measures reducing crime and the fear of crime.
1.306 Safer Lewisham Strategy 2008-2011 Action Plan	<p>1.308 - Reducing the overall level of crime in Lewisham</p> <p>1.309 - Reducing the level of Anti Social Behaviour in Lewisham</p> <p>1.310 - Improve interventions for those in the criminal justice system</p> <p>1.311 - Improve safety for residents of Lewisham</p> <p>1.312 - Increase reassurance about the criminal justice system through improved victim support, and</p> <p>1.313 community engagement</p>	1.314 The DPD should promote safe town centres through policy.	1.315 The SA should include objectives to enhance safety.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>1.316 Safer Lewisham Plan 2011-2012 (Draft for approval)</p>	<p>1.318 - Reducing Anti-social Behaviour (ASB)</p> <p>1.319 - Reducing Reoffending – rehabilitation, punishment and payback</p> <p>1.320 - 'Volume Crime' – Offending that affects most people in Lewisham</p> <p>1.321 - Working with young people - both victims and perpetrators of crime – Youth Justice</p> <p>1.322 - Making Lewisham Safer Through Crime Prevention – and working with communities</p>	<p>1.323 The DPD should promote safe town centres through policy.</p>	<p>1.324 The SA should include objectives to enhance safety.</p>
<p>1.325 Lewisham Corporate Strategy 2011</p>	<p>1.326 The purpose of the Corporate Plan is to:</p> <ul style="list-style-type: none"> <li>• set out the Council's vision, values, strategic direction and key priorities for action up to 2009 and beyond</li> <li>• outline the Council's contribution to the</li> </ul>	<p>1.327 The DPD should have regard to the corporate priorities which are set out in the SCS and the Corporate Plan.</p>	<p>1.328 Sustainability appraisal objectives should have regard to those contained in the Plan.</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	delivery of the SCS		
1.329 Ageing well in Lewisham – A draft wellbeing strategy for older people 2007-10	<p>1.331 Aim - all older people in Lewisham 'age well' and continue to live active and independent lives.</p> <p>1.332 Vision - older people live healthier and longer lives, with greater choice and control over the services they receive. And where older people make a full contribution to community life, confident that their experience, skills and time are valued.</p>	1.333 The DPD should seek to promote an accessible area for all.	1.334 The SA should ensure the DPD promotes accessibility for all.
1.335 Lewisham Cultural Strategy 2009-2013 (November, 2009)	<p>1.337 Aims to:</p> <p>1.338 - provide a clear framework, and set priorities for the wide range of existing activity contributing to the cultural agenda in Lewisham</p> <p>1.339 - build on the extensive progress made during the last five years</p> <p>1.340 - reflect changing national and local</p>	1.342 The aims and objectives of the cultural strategy should be included within the development of the DPD were appropriate.	1.343 The SA should ensure cultural and diversity is integrated within the DPD.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>government priorities</p> <p>1.341 - capitalise on the opportunities presented to the borough by the London Olympics and Paralympics in 2012.</p>		
<p>1.344 People, Prosperity, Place: Lewisham Regeneration Strategy 2008-20</p>	<p>1.345 The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy for regeneration also complements the SCS.</p>	<p>1.346 The DPD should support the implementation of the strategy.</p>	<p>1.347 The SA objectives should contain objectives that seek to ensure the sustainable development of the borough. This includes measures that seek to promote sustainable regeneration in suitable locations.</p>
<p>1.348 Lewisham Physical Activity Plan 2010-2013: more people, more active, more often in everyday life &amp; leisure</p>	<p>1.350 Provides a context and recommendations for developing and building on existing success stories in Lewisham.</p> <p>1.351 <i>Vision</i> - For people living and working in Lewisham to enjoy the full physical, mental, economic, environmental and social benefits of increased physical</p>	<p>1.356 The DPD should consider how physical activity and health benefits can be promoted</p>	<p>1.357 The SA should ensure that physical activity and health are promoted within the DPOD</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>activity”</p> <p>1.352 <i>Goal</i> - For 70% of the Lewisham population to be reasonably active (i.e.30 minutes of moderate intensity exercise five times a week for adults) by 2020</p> <p>1.353 <i>Aims</i> - To get more people in Lewisham more active more often</p> <p>1.354 - To work towards getting 10,000 more adults reasonably active each year</p> <p>1.355 <i>Objectives</i> - activities are structured around 7 key themes identified in a National Institute of Clinical Excellence (NICE) “Physical Activity Framework”.</p>		
1.358 Lewisham Social Inclusion Strategy 2005-2013	1.359 Vision – to make Lewisham the best place in London to live, work and learn. To ensure that the barriers that prevent people from participating in social, cultural, community and economic activities are removed and that the effects of poverty	1.360 The DPD should promote social inclusion	1.361 The SA should ensure social inclusion is promoted through- out the DPD

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	and exclusion are balanced by properly targeted, quality services.		
1.362 Policy Submission: A Natural Renaissance For Lewisham 2006-2011 (Lewisham Biodiversity Partnership, February 2007)	1.364 Sets out the Partnership's aspirations for the immediate future. It identifies the opportunities and objectives which Lewisham's Biodiversity Partnership is committed to achieving and demonstrates the links that the conservation of Lewisham's biodiversity can make to the Council's continuing programmes within various directorates. Once embedded in Council policies, the Action Plans will serve as benchmarks against which we may monitor progress.	1.365 The DPD should protect and enhance biodiversity	1.366 The SA should include objectives to promote and protect biodiversity
1.367 'Homes for the future: raising aspirations, creating choice and meeting need' Lewisham's Housing Strategy 2009 - 2014	1.369 Focuses on delivering the right housing mix to meet the housing needs and aspirations of all the borough's residents and achieving the wider goals expressed within the SCS.	1.370 The DPD should support housing provision and enhance housing quality.	1.371 SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.372 Brighter futures: Lewisham's Homelessness Prevention Strategy 2009-2014	1.373 The Strategy complements the objectives of the Lewisham Housing Strategy and seeks to prevent homelessness by providing long term and sustainable housing and promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment.	1.374 The DPD should support housing provision and enhance housing quality to address social sustainability.	1.375 SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure and improve access to, and opportunities for, childcare, health, education, training and employment.
1.376 It's Everybody's Business: Lewisham Children and Young People's Plan 2009-2012	1.377 The Plan focuses on implementing actions to improving a number of key outcomes for children and young people which will improve their lives and life chances.	1.378 The DPD should include allocations that address access to and promotion of education, health and well-being, employment, open space and community facilities that will improve the life prospects for the borough's young people.	1.379 The SA objectives must include measures that will improve the life outcomes for residents – these can include measures on promotion of education, employment, housing and leisure and community facilities.
1.380 Lewisham Borough Sports Plan 2010-13	1.381 The Strategy provides a vision for sport to increase opportunities to participate in sport at all levels and for all ages	1.382 The DPD should seek to promote active lifestyles by protecting and maintaining open spaces and improving the quality of sports facilities in the borough.	1.383 The SA objectives should contain a measure seeking to enhance the health wellbeing levels in the borough.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.384 Social Inclusion Strategy 2005-13	1.385 This strategy centres around five broad themes. It identifies the links between the council's existing strategies and services to enable more joined-up working.	1.386 Social sustainability should be a key element in the DPD. This requires the promotion of sustainable transport and accessibility for all, implementing good urban design principles and the promotion of health, well being and education for all in the community. Good urban design principles will also enhance social inclusion.	1.387 The SA objectives should contain measures to promote social inclusion, measured by the DPD's efforts at improving urban design, transport, education and promoting health and well-being in the borough..
1.388 Local Biodiversity Action Plan – A Natural Renaissance For Lewisham	1.389 The key objective is the protection and enhancement of areas suitable for wildlife in the borough and to increase citizens' access to nature, even in urban areas.	1.390 The DPD should aim to protect and enhance local biodiversity across the borough, including in urban areas and areas that are set for regeneration.	1.391 The SA objectives should contain a measure to protect and enhance biodiversity across the borough.
1.392 Lewisham Municipal Waste Strategy	1.393 The Strategy aims to minimise Lewisham's annual growth in waste. Targets: Annual growth in waste less than the national 3% average, increase the amount of household waste that is recycled and composted, ensure 100% of Lewisham's population is served by	1.395 The DPD should ensure waste management is addressed.	1.396 The SA objectives should contain a measure that promotes the waste hierarchy and seeks to minimise the generation of waste.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	recyclable kerbside collection.		
1.397 Lewisham Carbon Reduction and Climate Change Strategy 2008	1.398 The Strategy is based on achieving a lasting and sustained decrease in emissions of CO <sub>2</sub> working with strategic partners and with citizens. Targets: Overall CO <sub>2</sub> reduction	1.399 The DPD should include land uses that reduce demand for energy, increase energy efficiency and increase the use of renewable energy and tackle fuel poverty.	1.400 The SA objectives should include measures that aim to reduce the borough's carbon footprint.
1.401 Lewisham Local Air Quality Action Plan 2008	1.402 The key aim is to bring about change to reduce emissions (NO <sub>2</sub> and PM <sub>10</sub> ) from main source of pollution (road transport) in a cost-effective and proportionate way. This is to be achieved by establishing four Area Quality Management Areas (AQMA) with designated geographical boundaries.  Targets: Reduction in NO <sub>2</sub> and PM <sub>10</sub>	1.404 The DPD should ensure site allocations promote land uses and activities with minimal impacts on air quality.	1.405 The SA objectives should include a measure that seeks to improve air quality across the borough.
1.406 Lewisham Strategic Flood Risk Assessment (2008)	1.407 In accordance with PPS25, the study identifies and provides advice to the Council on the suitability of development in	1.408 The DPD should ensure the findings of the SFRA are taken into	1.409 The SA objectives should contain a measure that seeks to minimise and mitigate the risk of

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	areas at varying risks of flooding across the borough.	account to reduce flood risk.	flooding in the borough.
1.410 Lewisham Flood Risk and Development Sequential Test (2009)	1.411 The sequential test identifies potential development sites and steers development to areas at lowest risk of flooding. Where there are no reasonable alternative sites in an area of lower flood risk, authorities must ensure that measures are incorporated that render the proposed development's vulnerability to flooding appropriate to the probability of flooding in the area.	1.412 The DPD should ensure the sequential test is taken into consideration.	1.413 The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
1.414 Lewisham Local Implementation Plan (Transport) (2006)	1.415 The Local Implementation Plan (LIP) is a statutory plan to implement the London Mayor's Transport Strategy.	1.416 The site allocations should reflect the objectives of the LIP and support its implementation.	1.417 The SA objectives should contain a measure that seeks to reduce car travel and increase the use of sustainable transport modes.
1.418 Lewisham Borough-wide Transport Study - Draft Final Report (2010)	1.419 The objective is to produce an integrated multi-modal strategy to support the two preferred spatial growth options.	1.420 The DPD site allocations should ensure sustainable modes of transport are promoted and provided.	1.421 The SA objectives should include a measure that seeks to reduce car travel and improve the use of sustainable modes of

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
			transport.
1.422 Deptford and New Cross Transport Infrastructure Study (2008)	1.423 The study provides an understanding of the likely travel impacts of new development and justification for new investment and a general approach to travel strategies.	1.424 The DPD should ensure development takes opportunities to ensure site connectivity with the wider neighbourhood.	1.425 The SA objectives should promote the use of sustainable transport modes in new developments.
1.426 Lewisham Employment Land Study (2008)	1.427 This study assesses future demand for employment land, compares land supply under current planning policies and in light of the Core Strategy makes policy recommendations on how far existing employment sites should be safeguarded from redevelopment for other uses.	1.428 This study forms part of the evidence base for the DPD. The DPD should provide for a range of employment land allocations.	1.429 The SA objectives should include a measure that encourages and promotes the development of employment opportunities in the borough over the long term.
1.430 Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA) (2009)	1.431 A joint collaboration between the Council and Lewisham Primary Care Trust(PCT). The JSNA identifies key themes for action aimed at improving long term health and influence the long term commissioning priorities of health infrastructure providers in the borough.	1.432 The JSNA will inform the preparation of the DPD.	1.433 The SA objectives should include a measure that seeks to improve the health and well-being of the borough’s residents.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.434 Lewisham Retail Capacity Study (2009)	<p>1.435 The Study assesses the existing and future supply and the capacity for additional retail floorspace within the borough and the role played by each town centre.</p> <p>1.436 Targets: None</p>	1.437 The DPD site allocations should support the protection and growth of town centres and provide for a range of retail and other land uses.	1.438 The SA objectives should include a measure that seeks to attract new investment and maximise sustainable economic growth in the borough.
1.439 Lewisham Strategic Housing Market Assessment (2008) and the South East London Sub-regional SHMA (2009)	1.440 The SHMA assesses housing provision and need within the borough and the five south east London boroughs. It outlines recommendations for the level of affordable housing and tenure mix, and identifies areas as well as specific groups within the borough and sub-region who may have different housing requirements.	1.441 The DPD should include appropriate site to meet housing need.	1.442 The SA objectives should include a measure that seeks to facilitate housing provision, including its mix and tenure, and to ensure decent homes for all.
1.443 Lewisham Infrastructure Delivery Plan (IDP) (2010)	1.444 The IDP provides details of current and future provision of a range of social, physical and green infrastructure, arising from population growth both natural and from potential new development.	1.446 The DPD site allocations should support the provision of infrastructure.	1.447 The SA objectives should include a measure that seeks to provide a range of physical, social and green infrastructure and ensure these facilities/services are accessible.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
1.448 South East London Boroughs' Waste Apportionment Paper (2010)	1.449 The waste paper shows how the South East London boroughs' will manage waste apportionment in The London Plan.	1.450 Allocate specific sites for waste management.	1.451 The SA objectives should include a measure that seeks to minimise waste and ensure management.
1.452 Ravensbourne River Corridor Improvement Plan (2010)	1.453 The improvement plan provides an analysis of the river's character and shows how development and recreation uses along its route can protect and enhance its key characteristics.	1.454 This study forms part of the evidence base for the DPD. Site allocations should support the protection and enhancement of the Ravensbourne River Corridor and the activities along its length.	1.455 The SA objectives should include measures to ensure the protection and enhancement of open space, biodiversity conservation, promotion of walking and cycling, management of flood risk and appropriate mitigation, enhancement of townscapes and landscape, provision of opportunities to enhance health and well-being.
1.456 London Borough of Lewisham Local Implementation Plan 2011-2031 (April 2011)	1.458 The LIP has prioritised a number of goals and constituent objectives and related  1.459 outcomes, built around the framework provided by the Mayor's	1.468 The DPD should consider sustainable transport opportunities and active travel	1.469 The SA should consider sustainable transport opportunities and active travel

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>Transport Strategy</p> <p>1.460 and influenced by the evidence base, consultation with the local community, local</p> <p>1.461 policies and the Sub Regional Transport Plan.</p> <p>1.462 Goal 1. 'Safer'</p> <p>1.463 Goal 2. 'Clean, green and liveable'</p> <p>1.464 Goal 3. 'Healthy, active and enjoyable'</p> <p>1.465 Goal 4. 'Dynamic and prosperous'</p> <p>1.466 Goal 5. 'Improve transport opportunities for all'</p> <p>1.467 Goal 6. 'Better streets'</p>		
1.470 Lewisham Borough Wide	1.471 The character study provide a description of the physical form of the	1.472 This study forms part of the evidence base for the DPD. The DPD	1.473 The SA objectives should include a measure to ensure

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Character Study 2010	borough, its origins, places, streets and buildings to provide an understanding of the particular attributes of the London Borough of Lewisham	should ensure the borough's character is reflected in new development.	development impacts positively on the character of the Borough, including its historic assets.
1.474 Lewisham Conservation Area Management Plans	1.475 Provides guidance for the management of the borough's conservation areas.	1.476 The DPD should anticipate potential impacts of development on Lewisham's heritage assets and wider historic environment.	1.477 The SA objectives should properly anticipate potential impacts on Lewisham's heritage assets and wider historic environment.
1.478 Town Centre Health Checks (2009)	1.479 A survey of the borough's major and district town centres.	1.480 The DPD should support economic growth in town centres.	1.481 The SA objectives should include a measure that seeks to attract new investment and maximise sustainable economic growth in the borough.
1.482 'Lambeth, Southwark and Lewisham NHS LIFT Strategic Service Development Plan' 2008	<p>1.484 Strategic framework for local health and social care organisations. Aims to provide better access to better quality and more comprehensive services.</p> <p>1.485 - Achieve service objectives through effective investment in community based</p>	1.488 The DPD should ensure consistency with the NHS Plan	1.489 The SA objectives should improve the health and wellbeing of the population and reduce inequalities in health.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	<p>health and social care facilities.</p> <p>1.486 - Use collective resources to the best effect and in particular to maximise the use of available sites.</p> <p>1.487 - Seize opportunities to work collaboratively with other agencies where this achieves better results for the population served.</p>		
<p>1.490 Healthy Weight Healthy Lives (PCT with LB Lewisham) 2009</p>	<p>1.491 The strategy is linked in to the Children and Young People's plan and is a partnership strategy to promote healthy weight and lives in children, young people and their families.</p>	<p>1.492 The DPD should ensure site allocations promote health and well-being.</p>	<p>1.493 The SA objectives should improve the health and wellbeing of the population and reduce inequalities in health.</p>

## Appendix B – Sustainability Appraisal Objectives

Topic	Indicators
<b>Economic</b>	
<p><b>SEA Topic Population</b></p> <p>1. To encourage sustained economic growth across a variety of sectors</p> <p><b>SEA Topic Population</b></p> <p>2. To encourage and promote employment and new enterprises in Lewisham</p>	<ul style="list-style-type: none"> <li>• Amount of completed employment floorspace</li> <li>• Area (ha) of land within:               <ul style="list-style-type: none"> <li>○ Strategic Industrial Locations</li> <li>○ Mixed Use Employment Locations</li> <li>○ Local Employment Locations</li> </ul> </li> <li>• Amount of completed retail, office and leisure development</li> <li>• Employee jobs in Lewisham</li> <li>• Job density in Lewisham</li> <li>• Employment and unemployment</li> <li>• Number of workers in Lewisham (employees in employment)</li> <li>• 16 to 18 year old who are not in education, training or employment (NEET)</li> </ul>
<b>Environmental</b>	
<p><b>SEA Topic Waste</b></p> <p>3. To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates</p> <p><b>SEA Topic Waste/Air/Water/Climate</b></p> <p>4. To use and manage the consumption of natural resources in a sustainable manner</p>	<ul style="list-style-type: none"> <li>• Residual household waste per household</li> <li>• % of household waste sent for reuse, recycling or composting</li> <li>• % of municipal waste sent to landfill</li> <li>• New and converted dwellings (gross) on previously developed land</li> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality</li> <li>• Change in biological river quality (good)</li> <li>• Change in chemical river quality (good)</li> <li>• Number of Code of Sustainable Homes (CSH) granted and completed</li> <li>• Number of BREEAM buildings granted and completed</li> <li>• Number and capacity of renewable energy granted and completed</li> <li>• Number and capacity of decentralised energy granted and completed</li> <li>• Number and size of living roofs granted and completed</li> <li>• Number of applications granted or refused</li> </ul>

Topic	Indicators
<p><b>SEA Topic Population/Human Health/Biodiversity</b></p> <p>5. To protect and enhance the borough's open spaces</p> <p><b>SEA Topic Human Health/Biodiversity</b></p> <p>6. To protect and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature</p>	<ul style="list-style-type: none"> <li>on designated open space</li> <li>• Number of applications within SINCs granted or refused planning permission</li> <li>• Amount of new open space provided as part of a new development, including that which provides a net gain for biodiversity and accessible natural greenspace</li> <li>• % of eligible open space managed to Green Flag award standard</li> <li>• Number. of new allotments and community gardens</li> <li>• Number of people on allotment waiting list</li> <li>• Number of applications within SINCs granted or refused planning permission</li> <li>• Amount of new open space provided as part of a new development, including that which provides a net gain for biodiversity and accessible natural greenspace</li> <li>• Length of local river restored/ naturalised</li> <li>• Changes in areas and populations of biodiversity importance, including: (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, or sub-regional significance</li> <li>• No. of people participated in Nature's gym conservation events and volunteering</li> </ul>
<p><b>SEA Topic Air/Human Health</b></p> <p>7. To improve air quality and reduce noise and vibration</p>	<ul style="list-style-type: none"> <li>• Levels Exceeding Main Air Pollutant Quality Standards</li> <li>• Level of NO2 and PM10</li> <li>• Noise complaints</li> <li>• % completed non-residential development complying with car-parking standards</li> <li>• Public Transport Accessibility (PTAL)</li> <li>• Proportion of journeys made on foot and cycle</li> <li>• Number of completed car limited development</li> <li>• Number of electric car charging point</li> <li>• % of permitted major developments with travel plans</li> </ul>

Topic	Indicators
<p><b>SEA Topic Population/Human Health/Air/Climate</b></p> <p>8. To reduce car travel and improve accessibility by sustainable modes of transport</p> <p><b>SEA Topic Climate</b></p> <p>9. To mitigate, and adapt to the impact of climate change</p> <p><b>SEA Topic Water/Climate</b></p> <p>10. To reduce and manage flood risk</p> <p><b>SEA Topic Landscape</b></p> <p>11. To maintain and enhance landscapes and townscapes</p> <p><b>SEA Topic Cultural Heritage</b></p> <p>12. To conserve and enhance heritage assets and use in the creation of sustainable places</p>	<ul style="list-style-type: none"> <li>• Number of new cycle facilities</li> <li>• Number of car clubs and parking bays in the Borough</li> <li>• Renewable energy capacity installed by type</li> <li>• Per capita reductions in CO2 emissions</li> <li>• Amount of green infrastructure (GI) (delivered through development) that could deliver a net gain for biodiversity and the amount of accessible natural greenspace</li> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality</li> <li>• Number of SUDS granted and installed</li> <li>• Number of Listed Buildings (newly listed and demolished)</li> <li>• Number listed parks</li> <li>• Provision of BAP habitat and GI (delivered through development) that could deliver a net gain for biodiversity and the amount of accessible natural greenspace</li> <li>• Percentage of conservation areas in the Borough with an up-to-date character appraisal</li> <li>• Percentage of conservation areas in the Borough with management proposals</li> <li>• Number of buildings on/added/ removed from the English Heritage 'At risk' Register</li> <li>• Number of conservation area appraisals completed</li> </ul>
<b>Social</b>	
<p><b>SEA Topic Population/ Human Health</b></p> <p>13. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home</p>	<ul style="list-style-type: none"> <li>• Number of housing completions</li> <li>• Number of affordable housing completions</li> <li>• Mix in housing tenure</li> <li>• Mix in dwelling sizes</li> <li>• Housing completed to Lifetime Homes standard</li> </ul>

Topic	Indicators
<p><b>SEA Topic Population/ Human Health</b></p> <p>14. To improve the health and well-being of the population and reduce inequalities in health</p>	<ul style="list-style-type: none"> <li>• Households with a Limiting Long-Term Illness</li> <li>• Gain and losses of community and recreational facilities completed</li> <li>• Delivery of identified social infrastructure</li> <li>• Mortality rate from circulatory disease at age under 75</li> <li>• Mortality rate from all cancers at age under 75</li> </ul>
<p><b>SEA Topic Population/ Human Health</b></p> <p>15. To address deprivation, promote social inclusion and ensure equitable outcomes for all communities</p>	<ul style="list-style-type: none"> <li>• Health life expectancy at age 65</li> <li>• Index of Multiple Deprivation</li> </ul>
<p><b>SEA Topic Population/ Human Health</b></p> <p>16. To provide for the improvement of education, skills and training</p>	<ul style="list-style-type: none"> <li>• People aged 16-74 with no qualifications</li> <li>• Percentage of pupils achieving 5 or more GCSE's at grades A*-C or equivalent</li> <li>• Number of learners completing adult education basic skills programme</li> <li>• Violent crimes per 1,000 population</li> <li>• Violent crimes per 1,000 population</li> </ul>
<p><b>SEA Topic Population/ Human Health</b></p> <p>17. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime</p> <p>18.</p>	<ul style="list-style-type: none"> <li>• No. of recorded racial incidents per 10,000 population</li> <li>• No. of people participated in Nature's gym conservation events and volunteering</li> </ul>
<p><b>SEA Topic Population/ Human Health</b></p> <p>18. To encourage a sense of community identity, social cohesion and civic participation</p>	<ul style="list-style-type: none"> <li>• Number of physical visits to public libraries (per capita)</li> <li>• Funding secured through planning obligations for infrastructure, facilities and services</li> </ul>
<p><b>SEA Topic Population/ Human Health</b></p> <p>19. To improve accessibility to leisure facilities, community infrastructure and key local services</p>	

## Appendix C – SA Results: Options and Alternatives 2005/2006

Issue 0: Provision of New Homes and Housing Target									
HOUSING	Opt 0.1 - Adopt London Plan Target			Opt 0.2 - Exceed London Plan Target					Comments (Effects)
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	**	*	**	**	Opt 0.2		Exceeding the London target contributes to positive economic growth.
Employment	*	*	*	*	*	**	Opt 0.2		Exceeding the London target contributes to creating employment opportunities.
Minimise waste	0	#	#	#	#	##	Opt 0.1		Adopting rather than exceeding the housing target, will result in less waste generation.
Water quality	0	#	#	#	#	##	Opt 0.1		Provision of new housing beyond targets could negatively impact on water quality.
Biodiversity	0	#	#	#	#	##	Opt 0.1		Provision of new housing beyond targets could negatively impact on biodiversity.
Air quality	0	0	#	0	#	#	Opt 0.1		Provision of new housing beyond targets could negatively impact on air quality.
Energy	0	#	#	#	#	#	Opt 0.1		Provision of new housing beyond targets will create demand for increased energy.
Landscapes and Townscapes	0	0	0	0	#	#	Opt 0.1		Landscapes and townscapes will be under additional pressure from increased housing targets.
Historic environment	0	0	#	0	#	#	Opt 0.1		Historic sites will be under pressure for redevelopment from increased housing targets.
Sufficient & decent housing	*	**	**	**	**	**	Opt 0.2		Increased housing targets will contribute to the delivery of sufficient and decent housing.
Human health	0	0	0	0	0	0	Neutral		Need to ensure additional housing is linked (especially through walking and cycling) to town centres and community services
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral		Neutral impact.
Education	0	0	0	0	0	#	Opt 0.1		Demands for education will arise from increased population.
Reduce crime	0	0	#	0	#	#	Opt 0.1		Additional housing will result in additional people, which could impact negatively on crime.
Community welfare	0	0	0	0	0	0	Neutral		Need to ensure new communities are integrated and social welfare of existing communities improved.
Accessibility to services	0	0	0	0	0	0	Neutral		Future population will create additional needs for services. New development should be located to maximise accessibility.
							<b>Opt 0.1</b>		The provision of additional housing can negatively impact on the environment, and has the potential for negative social impacts. By meeting, rather than exceeding, the targets, the potential impacts can be minimised.

Issue 1: Housing Mix & Type														
HOUSING	Opt 1.1 - Set a preferred housing mix for affordable housing			Opt 1.2 - Set housing mix for market housing			Opt 1.3 - Set broad mix for all housing			Opt 1.4 - No Housing Mix Policy				
Objectives	Effects			Effects			Effects			Effects				Comments (Effects)
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	*	0	0	*	0	*	*	**	*	0	Opt 1.4	A more flexible mix that responds to the housing market will assist economic growth.
Employment	0	*	*	0	*	*	0	*	**	0	#	#	Opt 1.3	A set housing mix will ensure variety in housing choice and assist in the provision of affordable housing (especially key workers), thus assisting local employment.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing mix and type will have a minimal impact on waste.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing mix and type will have a minimal impact on water quality.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing mix and type will have a minimal impact on biodiversity.
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing mix and type will have a minimal impact on air quality.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing mix and type will have a minimal impact on energy use.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact from mix on landscape/townscape.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Minimal impact on the historic environment.
Sufficient & decent housing	*	**	**	*	*	**	*	**	**	0	#	##	Opt 1.3	A set housing mix for all housing will assist greatly in providing sufficient and decent housing.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Minimal impact on human health.
Reduce poverty & exclusion	0	*	**	*	*	**	*	**	**	0	#	##	Opt 1.3	Ensuring variety in the mix and and type of housing can assist in reducing social exclusion and contributing towards mixed and balanced communities.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	0	*	*	0	*	*	*	*	**	0	#	#	Opt 1.3	A broad mix can assist in more equitable access to services.
													<b>Opt 1.3</b>	Option 1.3 sets a broad mix for all housing types, rather than just market housing, which contributes positively on social objectives.

Issue 2: Special Needs Accommodation								
HOUSING	Opt 2.1 - Encourage provision of special needs housing			Opt 2.2 - Encourage the provision of special needs housing but not in concentration				Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Employment	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Minimise waste	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Water quality	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Biodiversity	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Air quality	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Energy	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Landscapes and Townscapes	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Historic environment	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Sufficient & decent housing	*	**	**	*	**	**	Opt 2.1/2.2	Mutually exclusive options. Both are positive and assist in housing provision for key groups.
Human health	*	*	*	*	*	*	Opt 2.1/2.2	Mutually exclusive options. Both are positive and contribute to the health and well being of key groups.
Reduce poverty & exclusion	*	*	*	*	*	*	Opt 2.1/2.2	Mutually exclusive options. Both are positive and assist in housing provision for key groups.
Education	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce crime	*	*	*	*	*	*	Opt 2.1/2.2	Housing provision for key groups contributes to health and well-being - thereby contributing to a reduction in crime.
Community welfare	*	*	*	*	**	**	Opt 2.2	Avoiding a concentration assists in creating mixed and balanced communities.
Accessibility to services	*	**	**	**	**	**	Opt 2.1/2.2	Concentrating services could assist in economies of scale for related services and accessibility requirements.
							<b>Opt 2.2</b>	Generally mutually exclusive options, however, avoiding a concentration assists in creating mixed and balanced communities.

**Issue 3: Gypsy and Traveller Sites**

HOUSING	Opt 3.1 - Criteria based Development Control & Site Allocations policy for consideration of new sites				Comments (Effects)
	Objectives				
	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure a contribution to economic growth.
Employment	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure potential employment opportunities.
Minimise waste	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure waste minimisation.
Water quality	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure water quality is not negatively impacted.
Biodiversity	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure biodiversity issues are addressed.
Air quality	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure air quality issues are adequately addressed.
Energy	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure sufficient energy reduction measures.
Landscapes and Townscapes	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure protection of the historic environment.
Historic environment	*	*	*	Opt 3.1	Criteria based policy will ensure protection of the historic environment.
Sufficient & decent housing	*	**	**	Opt 3.1	The criteria will assist in selecting suitable and sufficient sites for gypsy and travellers.
Human health	*	*	*	Opt 3.1	Provision for this group will contribute to health and well-being issues.
Reduce poverty & exclusion	0	*	*	Opt 3.1	Provision for this group will contribute positively social inclusion.
Education	0	0	0	Neutral	Generally a neutral impact. Criteria will need to ensure accessibility to education facilities.
Reduce crime	0	*	*	Opt 3.1	Criteria can secure adequate site/s and social well being for this group, which could impact positively on crime reduction.
Community welfare	0	*	*	Opt 3.1	Criteria based control and allocation policy for new sites will assist community welfare.
Accessibility to services	0	*	**	Opt 3.1	Criteria based control and allocation policy for new sites will assist this group accessing services.
				<b>Opt 3.1</b>	The option responds to Government guidance and the need to ensure all groups have access to suitable housing sites. The need to adopt criteria which responds to the relevant economic, environmental and social objectives and impacts will be crucial to ensure effective implementation.

Issue 4: Empty Homes					
HOUSING	Opt 4.1 - Encourage empty homes to be bought back into use.				Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	*	*	Opt 4.1	The re-use of empty homes is economically sensible.
Employment	0	*	*	Opt 4.1	The re-use of empty homes can assist employment by providing adequate and already established housing to perspective employees, and employment for those in the building and construction industry.
Minimise waste	*	*	*	Opt 4.1	Re-use of empty homes can reduce pressure to build new homes, thereby minimising waste, especially in the construction phase.
Water quality	0	0	*	Opt 4.1	The re-use of empty homes can reduce pressure to build new homes, having a positive long term benefit on water quality.
Biodiversity	*	*	*	Opt 4.1	The re-use of empty homes will reduce the pressure to build additional homes, contributing to the protection of biodiversity.
Air quality	0	*	*	Opt 4.1	The re-use of empty homes will reduce the need to build new homes, which can contribute positively on air quality.
Energy	0	0	*	Opt 4.1	The re-use of empty homes will reduce the pressure to build homes and thus assist in energy reduction.
Landscapes and Townscapes	*	*	*	Opt 4.1	Positive impact on landscapes and townscapes by reducing the pressure for new housing.
Historic environment	0	*	*	Opt 4.1	Restoring and using empty homes means homes are maintained and therefore contribute positively to the historic environment.
Sufficient & decent housing	*	**	**	Opt 4.1	The re-use of empty homes greatly assists in providing sufficient and decent housing.
Human health	0	0	0	Neutral	Generally a neutral impact.
Reduce poverty & exclusion	0	*	*	Opt 4.1	Social exclusion can be assisted by using existing empty homes.
Education	0	0	0	Neutral	Generally a neutral impact.
Reduce crime	0	*	*	Opt 4.1	The re-use of empty homes ensures people live in an area, increasing natural surveillance which can assist in crime reduction.
Community welfare	*	*	*	Opt 4.1	The welfare of the community will be assisted by re-using empty homes.
Accessibility to services	0	*	*	Opt 4.1	Established housing has better access to services.
				<b>Opt 4.1</b>	The re-use of empty homes has a positive impact on the range of economic, environmental and social objectives.

Issue 5 - Affordable Housing Thresholds & Contributions - Affordable Housing Threshold											
HOUSING	Opt 5.1 - Seek contribution on sites capable of providing >0.5 hectares or >15 dwellings			Opt 5.2 - Seek contribution on sites capable of providing >10 dwellings			Opt 5.3 - Seek contribution for all residential sites			Comments (Effects)	
Objectives	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	#	0	*	*	*	*	#	#	0	Opt 5.2	Potential negative impact on economic growth if all schemes required to provide affordable housing. Construction could be made economically unviable.
Employment	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Energy	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Sufficient & decent housing	*	*	**	*	**	**	**	**	**	Opt 5.3	Maximising the provision of affordable housing impacts positively on the provision of sufficient and decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Reduce poverty & exclusion	0	*	*	0	0	*	*	*	*	Opt 5.3	Maximising the provision of affordable housing impacts positively on reducing poverty and exclusion.
Education	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
Reduce crime	0	0	*	0	0	*	0	*	*	Opt 5.3	Ensuring sufficient and decent housing can contribute positively to social objectives, which can reduce the incidence of crime.
Community welfare	0	*	*	0	*	*	0	*	*	Opt 5.3	Ensuring sufficient and decent housing can contribute positively on community welfare.
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Generally a neutral impact.
										<b>Opt 5.3</b>	Option 5.3 maximises the provision of affordable housing and has positive social impacts.

**Issue 6: Affordable Housing Thresholds & Contributions - Amount of Affordable Housing**

HOUSING	Opt 6.1 - 20% of affordable housing			Opt 6.2 - 35% of affordable housing			Opt 6.3 - 50% of affordable housing			Opt 6.4 - 50% of affordable housing as part of large housing developments			Comments (Effects)	
	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	*	*	0	0	0	#	#	##	0	#	#	Opt 6.1	Less affordable housing will result in a greater economic windfall for development, which could spur economic growth.
Employment	0	*	*	*	*	**	*	**	**	*	*	**	Opt 6.3	Additional affordable housing will attract people (especially key workers) to the area and assist local employment.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Sufficient & decent housing	0	*	**	*	*	**	**	**	**	*	**	**	Opt 6.3	This option will result in the provision of the most affordable housing.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce poverty & exclusion	0	*	*	*	*	**	*	**	**	*	*	**	Opt 6.3	Additional affordable housing can contribute to poverty reduction and social inclusion.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Community welfare	0	0	*	0	0	*	0	0	*	0	0	*	Neutral	Ensuring sufficient and decent housing can contribute positively on community welfare.
Accessibility to services	0	0	0	0	0	0	0	0	0	0	0	0	Opt 6.3	Generally neutral impact.
													<b>Opt 6.3</b>	This options is the most sustainable, principally on social grounds as it will result in the highest yield in affordable housing.

Issue 7: Affordable Housing, Mixed & Balanced Communities & Tenure																				
HOUSING	Opt 7.1 - Seek affordable housing contribution of 70% social rented and 30% intermediate across the whole			Opt 7.2 - Seek only intermediate affordable housing in areas with an existing high concentration of social rented housing.			Opt 7.3 - Facilitate provision of social rented housing 'off-site' in areas of high social rented housing.			Opt 7.4 - Focus social rented housing in areas with currently low representation.			Opt 7.5 - Do not specify a mix, and make those determinations on a case-by-case basis.			Opt 7.6 - To seek, as part of the intermediate contribution, an element of key worker housing.			Comments (Effects)	
	Objectives			Effects			Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	#	0	0	0	0	*	0	0	*	0	*	*	*	**	**	0	0	0	Opt 7.5	More flexibility will allow the market to dictate mix, which will not restrain economic growth.
Employment	*	*	**	0	*	*	0	*	*	*	*	*	0	0	*	*	*	**	Opt 7.6	Provision for key worker housing can assist local employment.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on waste.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on water quality.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on biodiversity.
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on air quality.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on energy.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on landscapes and townscapes.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on the historic environment.
Sufficient & decent housing	**	**	**	*	*	**	*	**	**	*	**	**	0	0	*	0	*	*	Opt 7.1	Will result in the highest yield of social rented housing.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.

Reduce poverty & exclusion	*	*	**	0	*	*	*	*	*	*	*	*	0	0	*	0	*	*	Opt 7.1	Will result in the highest yield of social rented housing.
Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Housing tenure will have a neutral impact on education.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	*	*	**	0	*	*	0	*	*	*	*	*	0	0	0	0	0	*	Opt 7.1	Maximising social rented housing can contribute positively to community welfare.
Accessibility to services	*	*	**	*	**	**	0	*	*	0	*	*	0	0	*	0	*	*	Opt 7.4	Providing a mix in tenure, especially in areas with a higher concentration of social housing, will result in better access to services, as they are generally in place.
																			Opt 7.1	Specifying a mix in the tenure of affordable housing contributes positively to social objectives, and ensures provision.

FOR CONSIDERATION

Issue 8: Lifetime Homes / Wheelchair Accessible Homes														
HOUSING	Issue 8.1 - To require all housing to meet lifetime home standards			Issue 8.2 - To require all housing in major developments to meet lifetime homes standard			Issue 8.3 - To require 10% of all new housing to be wheelchair accessible or easily adapted for those using one.			Issue 8.4 - To require 10% of all new housing in major development to be wheelchair accessible.			Comments (Effects)	
	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	#	#	0	#	0	0	#	0	0	#	0	*	Opt 8.4	Meeting lifetime home standards could reduce the economic windfall for development - impacting economic growth.
Employment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Historic environment	#	#	#	0	0	0	0	0	0	0	0	0	Neutral	Requiring lifetime home standards could negatively impact on listed buildings.
Sufficient & decent housing	*	**	**	0	*	*	0	*	*	0	*	**	Opt 8.1	Maximises the provision of accessible housing.
Human health	*	*	*	0	*	*	0	*	*	*	*	*	Opt 8.1	Maximises the provision of accessible housing.
Reduce poverty & exclusion	*	**	**	0	0	*	*	*	*	*	*	**	Opt 8.1	Maximises the provision of accessible housing.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Community welfare	*	**	**	0	0	*	*	*	*	0	*	*	Opt 8.1	Maximises the provision of accessible housing.
Accessibility to services	*	**	**	0	*	*	*	*	**	0	*	**	Opt 8.1	Maximises the provision of accessible housing.
													<b>Opt 8.1</b>	Option 8.1 maximises the provision of accessible housing - positively contributing to social objectives.

Issue 9: Replacement of Housing Lost											
HOUSING	Opt 9.1 - Ensure that any loss of housing and special needs accommodation is replaced at the same density.			Opt 9.2 - Ensure that any loss of housing and special needs accommodation is replaced at higher densities.			Opt 9.3 - No policy requiring the replacement of housing and special needs accommodation lost.				Comments (Effects)
Objectives	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	0	*	**	**	0	#	#	Opt 9.2	Greater housing density contributes to economic growth.
Employment	0	0	*	0	*	*	0	0	#	Opt 9.2	Potential general positive impact on employment by increasing housing density.
Minimise waste	0	0	0	0	#	#	0	*	*	Opt 9.3	Reducing housing density by not replacing housing lost will marginally assist in minimising waste.
Water quality	0	0	0	0	#	#	0	*	*	Opt 9.3	Reducing housing density by not replacing housing lost will marginally assist water quality.
Biodiversity	0	0	0	0	#	#	0	*	*	Opt 9.3	No replacement housing is more likely to lead to improved biodiversity.
Air quality	0	0	0	0	#	#	0	*	*	Opt 9.3	No replacement housing is more likely to lead to improved air quality.
Energy	0	0	0	0	#	#	0	*	*	Opt 9.3	No replacement housing is more likely to lead to improved energy use.
Landscapes and Townscapes	0	*	*	0	0	#	0	0	#	Opt 9.1	Replacement of loss of housing at the same density will have a neutral impact on landscapes and townscapes.
Historic environment	0	0	0	0	#	#	0	*	*	Opt 9.3	No replacement housing is more likely going to result in better protection of the historic environment.
Sufficient & decent housing	*	*	*	**	**	**	0	#	##	Opt 9.2	Increased housing density will provide more dwellings and greater mix in housing choice.
Human health	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Education	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce crime	0	0	*	0	#	#	0	0	0	Opt 9.1	Replacement of loss will assist in reducing crime.
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	0	0	0	0	*	*	0	0	0	9.2	Higher density increases accessibility to services.
										Opt 9.3	Option 9.3 contributes positively to environmental objectives, which outweigh the negative social impacts.

Issue 10: Conversions														
HOUSING	Opt 10.1 - Allow conversions.			Opt 10.2 - Allow conversions only for houses that have a net floor space of 130sq.m or more.			Opt 10.3 - Allow conversions but require at least one family dwelling to be provided.			Opt 10.4 - Do not allow conversions.				Comments (Effects)
Objectives	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	*	*	0	0	*	0	0	*	0	#	#	Opt 10.1	Additional dwellings from conversions will assist economic growth in the med - long term.
Employment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Minimise waste	0	*	*	0	0	*	0	0	*	0	#	#	Opt 10.1	Generally, allowing conversions will reduce the pressure to building new dwellings which in the medium - long term will assist water quality.
Water quality	0	*	*	0	0	*	0	0	*	0	#	#	Opt 10.1	Generally, allowing conversions will reduce the pressure to building new dwellings which in the medium - long term will assist water quality.
Biodiversity	0	*	*	0	0	*	0	0	*	0	#	#	Opt 10.1	Generally, allowing conversions will reduce the pressure to building new dwellings which in the medium - long term will assist biodiversity.
Air quality	*	*	*	0	*	*	0	*	*	0	#	#	Opt 10.1	Converting an existing house rather than the construction of new dwellings has minor positive effects on air quality.
Energy	*	*	*	0	*	*	0	*	*	0	#	#	Opt 10.1	Converting an existing house rather than the construction of new dwellings has minor positive effects on energy.
Landscapes and Townscapes	0	*	*	0	*	*	0	0	*	0	0	0	Opt 10.2	Conversions generally result in a building be maintained and restored - thereby enhancing the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	*	*	*	Opt 10.4	Need to ensure historic assests are protected from conversion or do not have a negative impact on a building's exterior.
Sufficient & decent housing	*	*	**	*	**	**	*	*	**	#	#	##	Opt 10.2	Allowing conversions will provide additional housing - requiring a minimum floor space will ensure that more family housing is retained.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Accessibility to services	*	**	**	*	*	*	*	*	*	#	#	#	Opt 10.1	Increased housing in an area improves accessibility to services.
													<b>Opt 10.1</b>	Opt 10.1 achieves more conversions, however 10.2 stipulates a minimum floor space which will result in the provision of suitable family housing.

Issue 1: Location & Accessibility																				
TRANSPORT & PARKING	Opt TR1 - Allow higher density development where there is good public transport			Opt TR2 - Require transport assessment/travel impact statements for all new developments			Opt TR3 - Set thresholds for development required to submit travel impact statements			Opt TR4 - Require green travel plans for large developments or those generating a 'significant' amount of movement			Opt TR5 - Require developer contributions to public transport where deficiencies are identified			Opt TR6 - Require developers to only meet immediate transport improvements related to the development			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects			Effects			Effects							
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	**	0	*	*	0	0	0	0	*	*	#	0	*	*	*	*	Opt TR6	The provision of high density housing in close proximity to good transport links will assist economic growth the greatest.
Employment	*	*	**	0	*	*	0	0	0	0	*	*	*	*	*	0	*	*	Opt TR1	Employment is greatly assisted by good transport links and Opt TR1 is positive in this regard.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Biodiversity	0	*	*	0	0	*	0	0	*	0	*	*	0	*	*	0	0	*	Opt TR4	Green travel plans reduce car travel, which assist biodiversity.
Air quality	*	**	**	0	*	*	0	0	*	0	*	**	0	*	*	0	0	*	Opt TR1	Air quality will be improved if more people are located closer to good transport links and are less likely to use vehicles.
Energy																				
Landscapes and Townscapes	0	*	**	0	0	*	0	0	*	0	*	*	0	*	*	0	0	*	Opt TR1	Townscapes will be greatly assisted by the reduction in traffic and movement of vehicles.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Sufficient & decent housing	0	*	*	0	0	*	0	0	*	0	0	*	0	*	*	0	0	0	Opt TR1	Housing located nearer to public transport links will provide better access for persons without vehicles.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.

Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	*	**	**	0	*	*	0	*	**	0	*	*	0	*	*	0	0	*	Opt TR1	High density developments near good transport facilities will assist in accessing services.	
<b>Most Sustainable Option:</b>																			<b>Opt TR1</b>	The most sustainable option is to allow greater density around good transport nodes.	

FOR CONSULTATION

Issue 2: Traffic Management & Road Safety									
TRANSPORT & PARKING	TR7 - Manage and distribute traffic in accordance with the road hierarchy in the Lewisham Unitary Development Plan.			TR8 - Introduce engineering, education and enforcement measures to improve road safety.			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	0	0	0	0	0	0	Neutral	Neutral impact.	
Employment	0	0	0	0	0	0	Neutral	Neutral impact.	
Minimise waste	0	0	0	0	0	0	Neutral	Neutral impact.	
Water quality	0	0	0	0	0	0	Neutral	Neutral impact.	
Biodiversity	0	0	0	0	0	0	Neutral	Neutral impact.	
Air quality	0	0	0	0	0	0	Neutral	Neutral impact.	
Energy									
Landscapes and Townscapes	*	*	*	*	**	**	TR8	Effective management and road safety will impact both townscapes.	
Historic environment	0	0	0	0	0	0	Neutral	Neutral impact.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Neutral impact.	
Human health	0	0	0	0	*	*	TR8	Improved road safety will lead to less accidents and greater human health.	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Neutral impact.	
Education	0	0	0	*	*	*	TR8	Education measures to improve road safety are positive	
Reduce crime	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Not applicable.	
Community welfare	0	0	0	0	0	0	Neutral	Neutral impact.	
Accessibility to services	0	0	0	0	0	0	Neutral	Neutral impact.	
<b>Most Sustainable Option:</b>							<b>Opt TR8</b>	A more positive option using a range of methods to improve road safety.	

Issue 3: Parking Control																																
TRANSPORT & PARKING	Opt TR9 - Continue to use current UDP car parking standards			Opt TR10 - Use the car parking standards from the London Plan			Opt TR11 - Introduce other standards either locally derived or from national planning guidance			Opt TR12 - Require cycle parking provision in all new developments			Opt TR13 - Treat provision of cycle parking on an individual basis			Opt TR14 - Promote car free residential development where public transport is good			Opt TR15 - Insist on a minimum parking provision in all residential development			Opt TR16 - Extend the number of Controlled Parking Zones			Opt TR17 - Require developers to contribute towards the implementation of CPZs			Most Sustainable Option	Comments (Effects)			
	Effects			Effects			Effects			Effects			Effects			Effects			Effects			Effects										
Objectives	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	0	0	#	#	#	#	#	0	0	0	0	0	0	#	#	0	0	*	*	#	#	0	#	#	0	Opt TR15	Minimum parking standard will increase parking which could promote economic growth.			
Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Water quality	0	0	0	0	*	*	0	*	**	*	*	**	0	*	*	*	*	**	0	#	#	0	*	*	0	*	*	Opt TR14	Car free developments can assist in improving water quality by reducing hard areas allocated to parking.			
Biodiversity	0	0	0	0	*	*	0	*	**	*	*	**	0	*	*	*	*	**	0	#	#	0	*	*	0	*	*	Op TR14	Car free developments can contribute to biodiversity improvements.			

Air quality	0	0	0	0	*	**	0	*	**	*	*	**	0	*	*	*	**	**	0	#	##	*	*	*	0	*	**	Opt TR12 / TR14	Car free development and cycling will contribute to air quality improvements.
Energy	0	0	0	0	*	**	0	*	**	*	*	**	0	*	*	*	**	**	0	#	##	*	*	*	0	*	**	Opt TR12 / Opt TR14	Car free development and cycling can contribute to overall reductions in energy use.
Landscapes and Townscapes	0	0	0	0	*	*	0	*	*	0	*	*	0	0	*	0	*	**	0	#	#	*	*	*	0	*	*	Opt TR14	Landscapes and more specifically townscapes will benefit positively from car free developments.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	*	*	0	#	#	0	0	*	0	*	*	Opt TR14	Car free development will be positive in the historic areas of the borough.	
Sufficient & decent housing	N/A	N/A	Not applicable.																										
Human health	0	0	#	0	0	#	0	0	#	*	*	**	0	0	*	*	*	**	0	#	#	0	0	0	0	0	0	Opt TR12 / Opt TR14	Reducing car travel and the impact of vehicles can have a positive contribution on health.

Reduce poverty & exclusion	N/A	N/A	N/A	N/A	Not applicable.																												
Education	N/A	N/A	N/A	N/A	Not applicable.																												
Reduce crime	N/A	N/A	N/A	N/A	Not applicable.																												
Community welfare	N/A	*	*	*	N/A	N/A	N/A	*	*	*	N/A	N/A	N/A	N/A	N/A	Car free development and cycling can contribute to community cohesion as interaction is promoted.																	
Accessibility to services	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	*	*	*	0	0	0	0	0	0	0	0	0	0	0	0	0	TR14	Public transport accessibility improves access to services.
<b>Most Sustainable Option:</b>																												<b>Opt TR14</b>	Most sustainable option as vehicles are completely restricted.				

Issue 4: Promotion of Public Transport Improvements					
TRANSPORT & PARKING	Opt TR18 - Encourage safeguarding of transport facilities through avoiding inappropriate development.			Most Sustainable Option	Comments (Effects)
	Effects				
	S	M	L		
Economic Growth	*	**	**	TR18	Economic growth can be enhanced on the basis that transport facilities are safeguarded.
Employment	*	**	**	TR18	Employment relies heavily on public transport and its safeguarding is paramount.
Minimise waste	0	0	0	Neutral	Neutral impact.
Water quality	0	0	*	TR18	Minor positive benefit on waterways if less vehicles and public transport facilities are used and safeguarded.
Biodiversity	0	*	*	TR18	Minor positive benefit on biodiversity if less vehicles and public transport facilities are used and safeguarded.
Air quality	*	*	*	TR18	Safeguarding transport facilities will assist in reducing or maintaining car dependency and therefore provide a positive impact on air quality.
Energy	*	*	**	TR18	Energy use can be reduced through increased use of public transport.
Landscapes and Townscapes	*	*	*	TR18	Landscapes will benefit from the protection of transport facilities.
Historic environment	0	0	0	Neutral	Neutral impact.
Sufficient & decent housing	0	0	0	Neutral	Generally a neutral impact.
Human health	0	0	0	Neutral	Neutral impact.
Reduce poverty & exclusion	*	*	*	TR18	Safeguarding important transport facilities, can assist in reducing social exclusion.
Education	0	0	0	Neutral	Neutral impact.
Reduce crime	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	0	Neutral	Neutral impact.
Accessibility to services	*	*	*	TR18	Safeguarding transport facilities will assist in providing access to services.
<b>Most Sustainable Option:</b>				<b>TR18</b>	Only option available.

Lewisham Town Centre									
RETAIL & TOWN CENTRES	Aim to achieve Metropolitan Status for the Lewisham Town Centre			Maintain & enhance Lewisham's current status as a Major Centre			Most Sustainable Option	Comments (Effects)	
Objectives	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	**	**	**	*	*	*	Opt 1	To increase the floorspace in LTC would increase economic growth	
Employment	**	**	**	*	*	*	Opt 1	To increase the floorspace in LTC is likely to increase employment	
Minimise waste	0	0	0	0	0	0	Neutral	Limited impact on waste from either option	
Water quality	0	0	0	0	0	0	Neutral	Limited impact on water quality	
Biodiversity	0	0	0	0	0	0	Neutral	No impact on biodiversity	
Air quality	0	0	0	0	0	0	Neutral	Limited impact on air quality	
Landscapes and Townscapes	**	**	**	*	*	*	Opt 1	Increased investment could improve the Lewisham Town Centre	
Historic environment	0	0	0	0	0	0	Neutral	There would be little impact on the historic environment	
Sufficient & decent housing	*	*	*	0	0	0	Opt 1	Additional investment and development would provide additional housing in the LTC	
Human health	0	0	0	0	0	0	Neutral	Little to no impact by either option on human health	
Reduce poverty & exclusion	*	*	*	0	0	0	Opt 1	With the likelihood of increased employment, there is also the likelihood of reducing barriers to employment.	
Education	0	0	0	0	0	0	Neutral	Limited to or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited to or no impact	
Community welfare	**	**	**	*	*	*	Opt 1	Additional investment could lead to improvements in community welfare and identity	
Accessibility to services	**	**	**	*	*	*	Opt 1	Additional investment could improve accessibility to services	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Additional economic and employment growth opportunities that could provide improved housing and access to services	

Catford Town Centre									
RETAIL & TOWN CENTRES	Maintain, protect and enhance Catford's status as a major town centre.			Secure the regeneration of Catford Town Centre by promoting high quality design in the built and natural environment.			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	**	**	**	**	**	**	All	To increase the floorspace in CTC would increase economic growth	
Employment	**	**	**	**	**	**	All	To increase the floorspace in CTC is likely to increase employment	
Minimise waste	#	#	#	#	#	*	Opt 2	Limited impact on waste from either option but over time and with major investment could implement sustainable waste measures into CTC.	
Water quality	0	0	0	0	*	*	Opt 2	Limited impact on water quality however with new development emerging, an opportunity for sustainable methods could occur.	
Biodiversity	0	0	0	*	**	**	Opt 2	Environmental enhancements from new developments offer new biodiversity opportunities in CTC	
Air quality	0	0	0	*/#	*/#	*	Opt 2	Limited impact on air quality but through good quality design and improvements could reduce the number of private vehicles on the road.	
Landscapes and Townscapes	**	**	**	**	**	**	Opt 1 & 2	Increased investment and good design could improve the CTC	
Historic environment	*	*	*	**	**	**	Opt 2	New developments would need to be in keeping with the historic environment. New development would be encouraged to be in character and as such would have little impact and great improvement on the historic environment	
Sufficient & decent housing	*	*	*	**	**	**	Opt 2	Additional investment and development could provide additional housing	
Human health	0	0	*	*	*	*	Opt 2	Little to no impact by either option on human health	
Reduce poverty & exclusion	*	*	*	**	**	**	Opt 2	With large investment offers opportunities for people working themselves out of poverty and exclusion. Opportunities may present themselves before, during and after completion of regeneration works.	
Education	0	0	0	0	0	0	Neutral	Limited to or no impact	
Reduce crime	*	*	*	**	**	**	Opt 2	Designing out crime would be incorporated into a high quality urban design scheme which would prove more effective.	
Community welfare	*	*	*	**	**	**	Opt 2	Additional investment could lead to improvements in community welfare and identity	
Accessibility to services	*	*	*	**	**	**	Opt 2	Additional investment could improve accessibility to services and reduce the need for private vehicles.	
<b>Most Sustainable Option:</b>							<b>Opt 2</b>	<b>Additional economic and employment growth opportunities that could provide improved housing and access to services</b>	

Blackheath - Role & Function											
RETAIL & TOWN CENTRES	Aim to maintain the current level of diversity offered within the Blackheath Town Centre			Enhance and further encourage the existing strength of the evening economy in Blackheath			Aim to increase the number of comparison stores, towards a balance of convenience and comparison outlets			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	**	**	**	**	**	**	Opt 2 & 3	Economic growth can occur in either of the options.
Employment	*	*	*	**	**	**	**	**	**	Opt 2 & 3	Employment can be improved in either of the options.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	All	In different ways the 3 options all slightly improve the townscape through encouraging the full occupancy of Blackheath
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce poverty & exclusion	0	0	0	*	*	*	0	0	0	Opt 2	This option would open up opportunities for low skilled workers.
Education	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	*	*	*	0	0	0	Opt 2	This option could increase natural surveillance which would act as preventative measure for reducing crime.
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
<b>Most Sustainable Option:</b>										<b>Opt 2</b>	Option 2 proves to be the most sustainable option with 5 positives. Alternatively a combination of the options could provide a more sustainable response.

Deptford - Role & Function									
RETAIL & TOWN CENTRES	Encourage and enhance the existing local convenience market within the Deptford Town Centre			Encourage a greater variety of shops to the Deptford Town Centre			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	**	**	**	Opt 2	Benefits through expansion	
Employment	*	*	*	*	*	*	All	Some benefits to employment	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Landscapes and Townscapes	*	*	*	*	*	*	All	Improved townscapes through good patronage	
Historic environment	*	*	*	*	*	*	All	Improved townscapes through good patronage	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact	
Human health	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited to no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	0	0	0	0	0	Neutral	Limited to no impact	
<b>Most Sustainable Option:</b>							<b>Opt 2</b>	The encouragement of a variety of shops would provide better employment benefits	

Downham - Role & Function									
RETAIL & TOWN CENTRES	Maintain and enhance the existing focus and strengths of the Downham centre			Diversify the existing Downham town centre			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	**	**	**	Opt 2	Benefits through expansion	
Employment	*	*	*	*	*	*	All	Some benefits to employment	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Landscapes and Townscapes	*	*	*	*	*	*	All	Improved townscapes through good patronage	
Historic environment	*	*	*	*	*	*	All	Improved townscapes through good patronage	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact	
Human health	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited to no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	0	0	0	0	0	Neutral	Limited to no impact	
<b>Most Sustainable Option:</b>							<b>Opt 2</b>	Diversification of the town centre may provide better employment benefits	

Forest Hill - Role & Function											
RETAIL & TOWN CENTRES	Maintain the existing focus and strength of the role and function of the Forrest Hill District Centre.			Enhance the existing focus and strength of the role and function of the Forest Hill District Town Centre.			Aim to attract more national names to diversify the provision of goods and services at the Forest Hill District Centre.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	**	**	**	**	**	**	Opt 2 & 3	Polices to increase or improve retail will benefit economic growth
Employment	*	*	*	*	*	*	*	*	*	All	Policies to increase retail are likely to benefit employment
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	All	These policies would all improve the townscape
Historic environment	*	*	*	*	*	*	*	*	*	All	These policies would all improve the historic townscape
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce poverty & exclusion	0	0	0	*	*	*	0	0	0	Opt 2	This option would open up opportunities for low skilled workers.
Education	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
<b>Most Sustainable Option:</b>										<b>Opt 2</b>	Option 2 would provide enhancements to the area whilst maintaining economic growth and reduce exclusion and poverty.

Lee Green - Role & Function											
RETAIL & TOWN CENTRES	Maintain the existing focus and strength of the role and function of the Lee Green district centre			Enhance the existing focus and strength of the role and function of the Lee Green district town centre			Aim to attract more national names to diversify the provision of goods and services at the Lee Green district centre.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	**	**	**	**	**	**	Opt 2 & 3	Polices to increase or improve retail will benefit economic growth
Employment	*	*	*	*	*	*	*	*	*	All	Policies to increase retail are likely to benefit employment
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	All	These policies would all improve the townscape
Historic environment	*	*	*	*	*	*	*	*	*	All	These policies would all improve the historic townscape
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce poverty & exclusion	0	0	0	*	*	*	0	0	0	Opt 2	This option would open up opportunities for low skilled workers.
Education	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
<b>Most Sustainable Option:</b>										<b>Opt 2</b>	Option 2 would provide enhancements to the area whilst maintaining economic growth and reduce exclusion and poverty.

New Cross - Role & Function											
RETAIL & TOWN CENTRES	Maintain the existing focus and strength of a local service centre, catering for the student pop & evening economy.			Enhance the existing focus & strength of the local service centre, catering to the student pop & evening economy.			Aim to attract more national names to diversify the provision of goods and services at the New Cross centre.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	**	**	**	**	**	**	Opt 2&3	Polices to increase or improve retail will benefit economic growth
Employment	*	*	*	*	*	*	*	*	*	All	Policies to increase retail are likely to benefit employment
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	All	These policies would all improve the townscape
Historic environment	*	*	*	*	*	*	*	*	*	All	These policies would all improve the historic townscape
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce poverty & exclusion	0	0	0	*	*	*	0	0	0	Opt 2	This option would open up opportunities for low skilled workers.
Education	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
<b>Most Sustainable Option:</b>										<b>Opt 2</b>	Option 2 would provide enhancements to the area whilst maintaining economic growth and reduce exclusion and poverty.

Sydenham - Role & Function											
RETAIL & TOWN CENTRES	Maintain the existing focus and strength of the Sydenham district centre of that of a local service centre.			Enhance the existing focus and strength of Sydenham as a local service centre.			Aim to increase the number of comparison stores, towards a balance of convenience and comparison outlets			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	**	**	**	**	**	**	Opt 2&3	Polices to increase or improve retail will benefit economic growth
Employment	*	*	*	*	*	*	*	*	*	All	Policies to increase retail are likely to benefit employment
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	All	These policies would all improve the townscape
Historic environment	*	*	*	*	*	*	*	*	*	All	These policies would all improve the historic townscape
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce poverty & exclusion	0	0	0	*	*	*	0	0	0	Opt 2	This option would open up opportunities for low skilled workers.
Education	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
<b>Most Sustainable Option:</b>										<b>Opt 2</b>	Option 2 would provide enhancements to the area whilst maintaining economic growth and reduce exclusion and poverty.

Blackheath - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Deptford - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Downham - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Forest Hill - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Lee Green - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

New Cross - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Sydenham - Vitality & Viability											
RETAIL & TOWN CENTRES	The use of designated core and secondary or non-core areas within the District Centre			Specialist areas or Quarters which have a focus on a particular or complementary use or activity			No restrictions on various uses within the designated centre boundary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	*	*	*	All	Benefits from collective or market led location of Goods and Service providers
Employment	*	*	*	*	*	*	*	*	*	All	Could employ specialist with particular skills and allows business start ups and enterprises.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	No impact on waste
Water quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on water quality
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	No impact on biodiversity
Air quality	0	0	0	0	0	0	0	0	0	Neutral	No impact on air quality
Landscapes and Townscapes	*	*	*	*	*	*	#	#	#	1,2	Designated areas are likely to enhance character of areas and therefore benefit the townscape.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	No impact on the historic environment
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	2	Live-Work schemes may provide decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	No impact on human health
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Not applicable
Education	0	0	0	0	0	0	0	0	0	Neutral	No impact on education
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	No impact on crime
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	No impact on community welfare
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	No impact on the accessibility to services
<b>Most Sustainable Option:</b>										<b>1 or 2</b>	There are benefits of planning guidance for vitality and viability

Blackheath Town Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	There is only one option which has

Deptford Town Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	Only one option has been identified

Downham Town Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
	Objectives				
	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	Only one option has been identified

Forest Hill District Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	<b>Only one option has been identified</b>

Lee Green District Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	<b>Only one option has been identified</b>

New Cross District Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	<b>Only one option has been identified</b>

Sydenham District Centre - Accessibility & Car Parking					
RETAIL & TOWN CENTRES	Encourage greater accessibility by public transport			Most Sustainable Option	Comments (Effects)
Objectives	Effects				
	S	M	L		
Economic Growth	0	0	0	Neutral	Limited to no impact
Employment	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Minimise waste	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	Neutral	Limited to no impact
Air quality	**	**	**	Opt 1	Air quality is likely to improve due to less motorised vehicles being used
Energy	**	**	**	Opt 1	This is likely to reduce the amount of energy dissipated by private motor vehicles.
Landscapes and Townscapes	*	*	*	Opt 1	Less car parking and therefore greater areas for the public
Historic environment	0	0	0	Neutral	Limited to no impact
Sufficient & decent housing	0	0	0	Neutral	Limited to no impact
Human health	*	*	*	Opt 1	By using public transport, less emissions will be released
Reduce poverty & exclusion	0	*	*	Opt 1	Over the medium to long term this will help towards reducing barriers to employment for people who cannot afford private vehicles will help to create a more cost saving option.
Education	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	Neutral	Limited to no impact
Community welfare	0	0	0	Neutral	Limited to no impact
Accessibility to services	**	**	**	Opt 1	Many services are located along transport routes, this option will allow greater flexibility for those who travel on public transport
<b>Most Sustainable Option:</b>				<b>Opt 1</b>	<b>Only one option has been identified</b>

Blackheath Town Centre - High Quality Environment & Design									
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Blackheath Town Centre			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements	
Employment	0	0	0	0	0	0	Neutral	Limited to no impact	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape	
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact	
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.	
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits	

Deptford Town Centre - High Quality Environment & Design								
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Deptford Town Centre			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements
Employment	0	0	0	0	0	0	Neutral	Limited to no impact
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.
<b>Most Sustainable Option:</b>							<b>Either</b>	Both option has sustainability benefits

Downham Town Centre - High Quality Environment & Design								
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Downham Town Centre			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements
Employment	0	0	0	0	0	0	Neutral	Limited to no impact
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits

Forest Hill Town Centre - High Quality Environment & Design									
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Forest Hill Town Centre			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements	
Employment	0	0	0	0	0	0	Neutral	Limited to no impact	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape	
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact	
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.	
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits	

Lee Green Town Centre - High Quality Environment & Design									
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Lee Green Town Centre			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements	
Employment	0	0	0	0	0	0	Neutral	Limited to no impact	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape	
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact	
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.	
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits	

New Cross Town Centre - High Quality Environment & Design								
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the New Cross Town Centre			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements
Employment	0	0	0	0	0	0	Neutral	Limited to no impact
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits

Sydenham Town Centre - High Quality Environment & Design								
RETAIL & TOWN CENTRES	Policies which encourage good quality design and seek improvements to the existing retail environment			Developing a specific design guide for the Sydenham Town Centre			Most Sustainable Option	Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	*	*	*	*	*	Both	Better growth in the area should provide more opportunities for improvements
Employment	0	0	0	0	0	0	Neutral	Limited to no impact
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	Neutral	Limited to no impact
Landscapes and Townscapes	*	**	**	*	**	**	Both	Good quality design will help to improve the townscape
Historic environment	*	**	**	*	**	**	Both	Good quality design can improve the historic buildings in the town centre
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited to no impact
Human health	0	*	*	0	*	*	Both	As the improvements to the townscape are made, this will encourage people to the town centres and improve its amenity role.
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	Neutral	Designing out crime will help to reduce the fear of crime and create more accessible and safer town centres.
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact
Accessibility to services	0	*	*	0	*	*	Both	Good quality designed buildings should factor in all kinds of mobility impaired customers which will further increase the retail environment for all.
<b>Most Sustainable Option:</b>							<b>Either</b>	Either option has sustainability benefits

Blackheath Town Centre - Boundary Modifications									
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Blackheath district			Modify the district centre boundary for Blackheath			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.	
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.	
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Energy	0	0	0	0	0	0	Neutral	Limited or no impact	
Landscapes and Townscapes	*	*	+/-	+/-	+/-	+/-	Opt 1	At present the current UDP has enabled Blackheath town centre to thrive, although this may change in future years the best option may be to retain the existing boundary	
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact	
Human health	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact	
Education	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact	
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Blackheath currently functions as a prosperous town centre. It may prove undesirable to make changes to the boundary at this time.	

Deptford Town Centre – Boundary Modifications								
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Deptford district			Modify the district centre boundary for Deptford			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact
Energy	0	0	0	0	0	0	Neutral	Limited or no impact
Landscapes and Townscapes	#	#	#	+/-	+/-	+/-	Opt 2	At present Deptford town centre is undergoing major regeneration. In this instance it may prove advantageous to alter its boundary to compliment this growth.
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact
Human health	0	0	0	0	0	0	Neutral	Limited or no impact
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact
Education	0	0	0	0	0	0	Neutral	Limited or no impact
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.
<b>Most Sustainable Option:</b>							<b>Opt 2</b>	Major investment in Deptford will strengthen the North and South of the Town Centre. In this case the most sustainable option would be to adopt Option 2 and alter the boundary to allow new development to benefit from this designation.

Downham Town Centre - Boundary Modifications									
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Downham district			Modify the district centre boundary for Downham			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.	
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.	
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Energy	0	0	0	0	0	0	Neutral	Limited or no impact	
Landscapes and Townscapes	*	*	+/-	+/-	+/-	+/-	Opt 1	At present the current UDP has enabled Downham town centre to thrive, although this may change in future years the best option may be to retain the existing boundary	
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact	
Human health	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact	
Education	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact	
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Downham currently functions as a prosperous town centre. It may prove undesirable to make changes to the boundary at this time.	

Forest Hill Town Centre - Boundary Modifications								
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Forest Hill district			Modify the district centre boundary for Forest Hill			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact
Energy	0	0	0	0	0	0	Neutral	Limited or no impact
Landscapes and Townscapes	*	*	+/-	+/-	+/-	+/-	Opt 1	At present the current UDP has enabled Forest Hill town centre to thrive, although this may change in future years the best option may be to retain the existing boundary
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact
Human health	0	0	0	0	0	0	Neutral	Limited or no impact
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact
Education	0	0	0	0	0	0	Neutral	Limited or no impact
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Forest Hill currently functions as a prosperous town centre. It may prove undesirable to make changes to the boundary at this time.

Lee Green Town Centre - Boundary Modifications									
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Lee Green district			Modify the district centre boundary for Lee Green			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.	
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.	
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Energy	0	0	0	0	0	0	Neutral	Limited or no impact	
Landscapes and Townscapes	*	*	+/-	+/-	+/-	+/-	Opt 1	At present the current UDP has enabled Lee Green town centre to thrive, although this may change in future years the best option may be to retain the existing boundary	
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact	
Human health	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact	
Education	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact	
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Lee Green currently functions as a prosperous town centre. It may prove undesirable to make changes to the boundary at this time.	

New Cross Town Centre - Boundary Modifications									
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the New Cross district			Modify the district centre boundary for New Cross			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.	
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.	
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Energy	0	0	0	0	0	0	Neutral	Limited or no impact	
Landscapes and Townscapes	#	#	#	+/-	+/-	+/-	Opt 2	At present the current UDP has not created a viable New Cross town centre. The centre currently operates down one side of the street. In this instance it may prove advantageous to alter its boundary to indicate a town centre with more purpose.	
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact	
Human health	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact	
Education	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact	
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.	
<b>Most Sustainable Option:</b>							<b>Opt 2</b>	New Cross is currently experiencing problems as a town centre. It may prove desirable to merge New Cross with New Cross gate to reinforce its position as a district town centre.	

Sydenham Town Centre - Boundary Modifications									
RETAIL & TOWN CENTRES	Retain the boundaries as currently indication in the UDP for the Sydenham district			Modify the district centre boundary for Sydenham			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	Both	By extending the boundary would enable more business/enterprise start ups through the availability of uses would allow the town centre generate more income.	
Employment	*	*	*	*	*	*	Both	With more enterprise business start ups being encouraged in Town Centres, this will inevitably lead to more people being employed.	
Minimise waste	0	0	0	0	0	0	Neutral	Limited or no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Biodiversity	0	0	0	0	0	0	Neutral	Limited or no impact	
Air quality	0	0	0	0	0	0	Neutral	Limited or no impact	
Energy	0	0	0	0	0	0	Neutral	Limited or no impact	
Landscapes and Townscapes	*	*	+/-	+/-	+/-	+/-	Opt 1	At present the current UDP has enabled Sydenham town centre to thrive, although this may change in future years the best option may be to retain the existing boundary	
Historic environment	*	*	+/-	+/-	+/-	+/-	Opt 1	For the survival of Lewisham's historic environment, it will be necessary to ensure that any boundary change would respect and be in synergy with historic boundaries.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Limited or no impact	
Human health	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited or no impact	
Education	0	0	0	0	0	0	Neutral	Limited or no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited or no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited or no impact	
Accessibility to services	0	0	0	0	*	*	Opt 2	Increasing the boundary will ensure nearby residents are within easy reach of their local centre.	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Sydenham currently functions as a prosperous town centre. It may prove undesirable to make changes to the boundary at this time.	

Neighbourhood Centres																	
RETAIL & TOWN CENTRES	Maintain, enhance and where possible further encourage the local role and function of Neighbourhood Centre			Plan for decline in unsuccessful centres			Incorporating the use of designated boundaries for the neighbourhood centres within the proposals map			Encouraging a safe, clean and inviting shopping environment			Seeking to maintain a health supply of local shops providing the necessary			Most Sustainable Option	Comments (Effects)
	Objectives			Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	#	#	#	*	*	*	*	*	*	*	*	*	1,3,4,5	The selected options offer scope for neighbourhood centres to draw in more consumers.
Employment	*	*	*	#	#	#	*	*	*	0	0	0	0	0	0	1,3	Employment benefits from growth, not decline therefore with an option to increase the boundary of the centre will enable more businesses to locate within these centres.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Energy	*	*	*	0	0	0	*/#	*/#	*/#	#	#	#	0	0	0	1,3	By encouraging safe, clean and more vibrant centres this will also mean that more energy is likely to be dissipated in pursuant to this.
Landscapes and Townscapes	*	*	*	#	#	#	0	0	0	*	*	*	*	*	*	1,4,5	Disadvantages from decline
Historic environment	*	*	*	#	#	#	0	0	0	*	*	*	0	0	0	1,4	Historic benefits from growth and imp
Sufficient & decent housing	0	0	0	*	*	*	0	0	0	0	0	0	0	0	0	2	Option 2 would enable redevelopment to provide residential close to amenities.
Human health	0	*	*	0	0	0	0	*	*	*	*	*	*	*	*	1,3,4,5	People encouraged to walk to the centre and redirection of centre boundaries should decrease the amount of pollution created by localised traffic.
Reduce poverty & exclusion	0	0	0	#	#	#	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact

Community welfare	*	*	*	#	#	#	0	0	0	0	0	0	*	*	*	1,5	Better community pride of centres
Accessibility to services	*	*	*	#	#	#	0	0	0	*	*	*	*	*	*	1,4,5	Attractive places attract more use and therefore better access to services
<b>Most Sustainable Option:</b>															<b>1</b>	Although a combination of options could be used, the most sustainable option proved to be option 1 due to its encouragement of economic growth, employment opportunities, energy consumption, the built environment, human health, community welfare and access to services	

FOR CONSULTATION

Local Parades														
RETAIL & TOWN CENTRES	Maintain, enhance and where possible further encourage the local role and function of Local Parades			Plan for decline in unsuccessful centres			Encouraging a safe, clean and inviting shopping environment			Seeking to maintain a health supply of local shops providing the necessary			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	*	#	#	#	*	*	*	*	*	*	1,3,4	The selected policies offer scope for neighbourhood centres to draw in more consumers.
Employment	*	*	*	#	#	#	0	0	0	0	0	0	1	Employment benefits from growth, not decline
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Energy	0	0	0	0	0	0	0	0	*	#	#	#	3	The selected option over time could enable energy consumption buy shops owners become more efficient over time.
Landscapes and Townscapes	*	*	*	#	#	#	*	*	*	0	0	0	1,3	Enhancing the landscape will benefit the public realm and encourage more consumers.
Historic environment	*	*	*	#	#	#	*	*	*	0	0	0	1,3	Historic benefits from growth and imps
Sufficient & decent housing	#	#	#	*	*	*	0	0	0	0	0	0	2	Option 2 would enable redevelopment to provide residential close to amenities.
Human health	*	*	*	#	#	#	*	*	*	*	*	*	1,3,4	People encouraged to walk to the centre
Reduce poverty & exclusion	0	0	0	#	#	#	0	0	0	0	0	0	Neutral	Limited to no impact
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Limited to no impact
Community welfare	*	*	*	#	#	#	*	*	*	*	*	*	1,3,4	Better community pride of centres
Accessibility to services	*	*	*	#	#	#	0	0	0	*	*	*	1,4	Attractive places attract more use and therefore better access to services
<b>Most Sustainable Option:</b>												<b>1 OR 3</b>	Combination option of 1 or 3 could be the direction to follow as both options proving equally sustainable.	

		Out of Town Centres							
RETAIL & TOWN CENTRES	Sequential test can be used to guide the location of any out-of-centre development	A threshold greater than 1000 m2 of gross floorspace						Most Sustainable Option	Comments (Effects)
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	1,2	Both options allow a significant amount of economic growth	
Employment	*	*	*	*	*	*	Neutral	Both options allow a significant amount of economic growth	
Minimise waste	0	0	0	0	0	0	Neutral	Limited to no impact	
Water quality	0	0	0	0	0	0	Neutral	Limited to no impact	
Biodiversity	0	*	*	0	*	*	1,2	Large scale structures can be havens for protected birds or bats as well as provide shelter for badgers, foxes and other mammals.	
Air quality	*	*	*	#	#	#	1	Option 1 would seek development to be sited so as to reduce the number and length of car journeys, whereas option 2 only addresses floorspace.	
Energy	#	#	#	#	#	#	0	It is assumed that both options would create large structures and be less efficient at minimising energy	
Landscapes and Townscapes	#	#	#	#	#	#	0	Out of town centres tend to house large bulky goods and may not contribute to the enhancement of the townscape	
Historic environment	0	0	0	0	0	0	Neutral	Limited to no impact	
Sufficient & decent housing	0	0	0	0	0	0	0	Limited to no impact	
Human health	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Limited to no impact	
Education	0	0	0	0	0	0	Neutral	Limited to no impact	
Reduce crime	0	0	0	0	0	0	Neutral	Limited to no impact	
Community welfare	0	0	0	0	0	0	Neutral	Limited to no impact	
Accessibility to services	0	0	0	0	0	0	Neutral	Limited to no impact	
<b>Most Sustainable Option:</b>							<b>Opt 1</b>	Compliance with PPS 6 and a threshold set down in the current UDP indicates the direction for this issue. The benefits of carrying out a sequential outweigh that of specifically prescribing a threshold of floorspace.	

Issue 1: Open Space Provision - Dealing with Deficiencies														
OPEN SPACE	CS Opt 1.1- Protect existing and set target for open space provision at 1.7h/1000			Opt 1.1 - Set target for 1.7ha/1000 by 2006 and increase to 1.75ha/1000 by 2010			Opt 1.2 - Maintain current provision of 1.67h/1000 with no aim to increase			Opt 1.3 - Set a target of 1.7/1000 in the areas of open space deficiency (UDP)			Most Sustainable Option	Comments (Effects)
Objectives	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	#	0	#	#	0	0	0	0	0	#	1.2	Doesn't put extra pressure on the land
Employment	0	0	0	0	0	#	0	0	0	0	0	0	1.2	Least amount of change
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Water quality	0	*	*	*	*	*	0	0	0	0	*	*	1.1	Improved, increase in permeable surfaces
Biodiversity	*	**	**	**	**	**	*	*	*	*	**	**	1.1	Provides greater area for biodiversity
Air quality	*	**	**	**	**	**	*	*	*	*	**	**	1.1	Provides more trees for filtering pollutants
Energy	*	*	*	*	*	**	0	0	0	*	*	**	1.1 or 1.3	Any option which seeks to provide more open space will help offset the amount of energy released by the built form.
Landscapes and Townscapes	*	*	*	*	*	**	0	0	0	*	*	*	1.1	As it provides more open space
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact, therefore no option better than others
Sufficient & decent housing	*	*	*	*	*	*	*	*	*	*	*	*	All	It is widely known that access to decent quality open space adds value to the health of its occupiers.
Human health	*	*	*	*	*	*	0	0	0	*	*	**	1.1 or 1.3	Increasing in areas where its needed or across the Borough
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact, therefore no option better than others
Education	0	0	*	0	*	*	0	0	0	0	*	*	1.1	More open space will mean better education options
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	*	*	*	*	0	0	0	*	*	*	1.1 or 1.3	more opportunities for sports and outdoor activities
Accessibility to services	0	*	*	*	*	*	0	0	0	*	*	*	1.1 or 1.3	More open space means better access for all
<b>Most Sustainable Option:</b>													<b>1.1</b>	While the most sustainable option is to provide the most open space the implications of this mean that other objectives are not met. A more moderate approach is likely to be more achievable.

**Issue 2: Protection and Enhancement of Open Space and Avoiding Inappropriate Development**

OPEN SPACE	CS Opt 2.1 Protect and enhance existing open space			CS Opt 2.2 Also create new open space in identified priority areas			Opt 2.1: Refuse planning permission that would have adverse effect on qualities of open space			Opt 2.2: Refuse planning permission on sites adjacent to any open space that would have adverse effect on qualities of open space			Opt 2.3: Refuse planning permission on sites adjacent to MOL that would have an adverse effect on MOL			Opt 2.4: Continue to protect MOL and POS, but adopt more permissive stance on UGS (private open space) based on a set of criteria			Opt 2.5: Require new development to set aside 1.7h/1000 head of population.			Opt 2.6: Require developers to make contributions to acquire land for open space relative to increase in pop numbers			Opt 2.7: Council to negotiate with landowners to allow access to private open space			Opt 2.8: Assess availability of brownfield sites for use as open space			Most Sust. Opt	Comments (Effects)						
	Effects			Effects			Effects			Effects			Effects			Effects			Effects			Effects																
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L			S	M	L			
Economic Growth	0	0	0	0	0	0	0	0	#	0	0	#	0	0	#	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#	2.4,2.5,2.6 &2.7	Minimal pressure on available land for development
Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#	#	Neutral	There is little correlation between employment and Open Space			
Minimise waste	0	0	0	*	*	*	0	0	0	0	0	0	0	0	0	0	0	0	*	*	*	**	**	**	0	0	0	**	**	**	0	0	0	2.6 & 2.8	Utilising brownfield land would free up areas deficient in open space for use			
Water quality	0	*	*	**	**	**	*	*	*	*	*	*	*	*	*	*	*	*	**	**	**	*	*	*	0	0	0	*	*	*	0	0	0	2.5	There are benefits of acquiring extra open space with regard to ensure water quality stays at a high level.			
Biodiversity	*	*	*	**	**	**	*	*	*	*	*	*	*	*	*	0	0	0	**	**	**	*	*	*	0	0	0	*	*	*	0	0	0	2.5	Benefits of acquiring extra pos			
Air quality	*	*	*	**	**	**	*	*	*	*	*	*	*	*	*	0	0	0	**	**	**	*	*	*	0	0	0	*	*	*	0	0	0	2.5	Benefits of acquiring extra pos			





Issue 3: Open Space Provision - Quality & Maintenance																	
OPEN SPACE	CS Opt 3.1: Improve quality and maximise use of Open Space.			Opt 3.1: Adopt actions set in the open Space Strategy for Lewisham			Opt 3.2: Set quality standards and criteria with ongoing public consultation.			Opt 3.3: Refuse permission for development that would inhibit access to Public Open Space in deficiency areas.			Opt 3.4: Seek planning contributions to improve Open Space in deficiency areas.			Most Sustainable Option	Comments (Effects)
	Objectives			Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	**	**	**	3.4	The reclamation of browhfield sites is a good way to incorporate new open space.
Water quality	*	*	*	*	*	*	*	*	*	0	0	0	0	*	*	3.1 & 3.2	Quality improvements would improve water quality.
Biodiversity	*	*	*	*	*	*	*	*	*	0	0	0	*	*	*	3.1,3,2 & 3.4	Quality improvements would improve biodiversity.
Air quality	*	*	*	*	*	*	*	*	*	0	0	0	*	*	*	3.1,3,2 & 3.4	Quality improvements would improve air quality
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	0	0	0	*	*	*	3.1,3,2 & 3.4	Quality Improvements would benefit landscapes
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	There is no impact on the historic environment
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	There is no impact on sufficient and decent housing
Human health	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	Good quality which encourages exercise has benefits
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Education	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	Better quality would encourage greater educational use
Reduce crime	0	0	*	0	0	*	0	0	*	0	0	*	0	0	*	All	Limited improvements on reducing crime
Community welfare	0	0	*	0	0	*	0	0	*	0	0	*	0	0	*	All	Limited improvements on community welfare

Accessibility to services	*	*	*	**	**	**	0	0	0	**	**	**	*	*	*	Neutral	Quality improvements would be able to provide bus routes close to existing open spaces have no impact on accessibility
<b>Most Sustainable Option:</b>																<b>3.1 and/or 3.2 and or 3.4</b>	It could be that a combination of the three options may be achievable to link all options together.

FOR CONSULTATION

Issue 4: Protection and Enhancement of Natural Habitats & Biodiversity																										
OPEN SPACE	CS Opt 4.1: Protect, enhance and create natural habitats especially in areas of deficiency			Opt 4.1: Set target to increase amount of Public Open Space actively managed as natural habitat			Opt 4.2: Permit developments that enhance biodiversity and geological conservation interests			Opt 4.3: Encourage naturalisation of waterways and esplanade areas			Opt 4.4: Support developments using green building methods			Opt 4.5: Development that harms nature conservation interests should only be granted where adequate mitigations measures are put in place			Opt 4.6: Council will need to be satisfied that any reasonable alternative sites for development have been satisfied			Most Sustainable Option/s	Comments (Effects)			
	Objectives	Effects			Effects			Effects			Effects			Effects			Effects									
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M			L		
Economic Growth	0	0	0	0	0	0	0	0	0	0	0	0	*	*	*	0	0	0	0	0	0	4.4	Support for green industries.			
Employment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No direct benefit to any one option.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No direct benefit to any one option.
Water quality	*	*	*	**	**	**	*	*	*	**	**	**	0	0	0	0	0	0	0	0	0	0	0	0	4.3	Direct benefit from improving waterways.
Biodiversity	*	*	*	**	**	**	**	**	**	*	*	*	0	0	0	0	0	0	0	0	0	0	0	0	4.1 & 4.2	Aims to increase biodiversity.
Air quality	*	*	*	*	*	*	*	*	*	*	*	*	0	0	0	0	0	0	0	0	0	0	0	0	4.1,4.2 & 4.3	Protected or enhanced pos improves air quality.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	*	*	0	0	0	0	0	0	0	0	0	4.4	Green and living roofs can compensate the effects of climate change by installing green roofs. As well as



Community welfare	0	*	*	*	*	*	*	*	*	*	0	0	0	0	0	*	0	0	0	0	0	0	4.1 & 4.2	Improved open space has community benefits.
Accessibility to services	*	*	*	*	*	*	*	*	*	*	*	*	0	0	0	0	0	0	0	0	0	0	4.1, 4.2 & 4.3	Open space can provide benefits for access to services.
<b>Most Sustainable Option:</b>																						4.1	However, a combination of the above options is most likely to be the most sustainable option.	

FOR CONSULTATION

Issue 5: Protection and Enhancement of Open Space Links & Corridors																	
OPEN SPACE	CS Opt 5.1: Protect ecological and recreational links and corridors			Opt 5.1: Development that harms any links should only be granted where adequate mitigations measures are put in place			Opt 5.2: Development in Green Chain area or Waterlink Way only granted permission if biodiversity enhanced			Opt 5.3:Encourage proposals for naturalisation of waterways			Most Sustainable Option/s	Comments (Effects)			
	Objectives			Effects			Effects			Effects					Effects		
	S	M	L	S	M	L	S	M	L	S	M	L					
Economic Growth	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Employment	0	0	0	0	#	#	0	#	#	0	0	0	0	0	Neutral	Though the options are slightly different and deal with different circumstances.	
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Water quality	*	*	*	0	0	0	*	*	*	**	**	**			5.3	This option would improve the water quality	
Biodiversity	*	*	*	*	*	*	**	**	**	*	*	*			5.2	As it specifically addresses biodiversity.	
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Energy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Landscapes and Townscapes	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	Protection and enhancement of open space links and corridors can improve the landscape and townscape	
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Human health	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	All options provide a benefit for human health.	
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.	
Education	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	There are benefits to education in the implementation of all these options	
Reduce crime	*	*	*	0	0	0	0	0	0	0	0	0	0	0	Neutral	These options are unlikely to reduce crime.	
Community welfare	*	*	*	0	0	0	0	0	0	0	0	0	0	0	Neutral	These options are unlikely to improve community welfare.	
Accessibility to services	*	*	*	*	*	*	*	*	*	*	*	*	*	*	All	All options will have a positive impact on accessibility to services.	
<b>Most Sustainable Option:</b>												<b>Combination</b>	As the options are slightly different a combination of options would be better.				

Issue 1 - Improving the Use of Energy											
SUSTAINABLE ENVIRONMENT	Opt 1.1 - Encourage improved energy efficiency and reduce carbon dioxide levels.			Opt 1.2 - Improve energy efficiency through criteria for assessment of new building developments (criteria listed).			Opt 1.3 - Require an assessment of energy demand for major developments (floor space 1000m <sup>2</sup> or >10 res. units applying the energy hierarchy			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	#	0	*	#	0	*	#	0	*	All	Neutral impact in relation to Economic growth. Upfront costs to Energy Efficiency in new homes will be countered by reduction of costs of utilities over time.
Employment	0	0	0	0	0	0	0	0	0	Neutral	Neutral Employment impact overall.
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Neutral Waste impact overall.
Water quality	0	0	*	0	0	*	0	0	*	All	Marginal improvement to water quality over time. Opt 1.1 does not have to rely on criteria.
Biodiversity	0	*/-	*/-	0	*/-	*/-	0	*/-	*/-	Neutral	Difficult to determine as biodiversity likely to be affected by climate change in both a positive and negative way. The effect is hence neutral
Air quality	0	*	*	0	*	*	0	*	*	Opt 1.1	Improvement to air quality by reduction in Carbon dioxide levels. Opt 1.1 does not have to rely on criteria.
Energy	*	*	*	**	**	*	**	**	**	Opt 1.1	Opt 1 has some positive impacts as it encourages energy efficiency. Opt 2 is criteria based which can change with time. Opt 3 however is a requirement and will thus be the most effective measure over time
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to landscapes & townscapes.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to the historic environment.
Sufficient & decent housing	*	*	*	*	*	*	*	*	*	Neutral	Improved energy efficiency in housing developments can help reduce fuel poverty. With rising energy prices over time this will become increasingly important
Human health	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to human health.
Reduce poverty & exclusion	*	*	*	*	*	*	*	*	*	N/A	Improved energy efficiency in housing developments can help reduce fuel poverty. With rising energy prices above the rate of inflation the effect of energy efficient housing will gain importance over time
Education	0	0	0	0	0	0	0	0	0	Neutral	Although some positive education impacts may occur from awareness raising about Energy Efficiency, these are only marginal and therefore result in an overall neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	Neutral	Energy Efficiency not applicable to the reduction of crime.

Community welfare	*	*	*	*	*	*	*	*	*	*	All	Improved energy efficiency measures in community buildings will improve the overall comfort of the building and reduce fuel bills
Accessibility to services	0	0	0	0	0	0	0	0	0	0	Neutral	Energy Efficiency not applicable to access to services.

**All the options are compatible. Option 1.1 does not rely on a specific criteria and is hence more sustainable in the long term. However, Opt 1.1 can be implemented by either Options 1.2 or 1.3.**

FOR CONSULTATION

Issue 2 - Providing for Renewable Energy											
SUSTAINABLE ENVIRONMENT	Opt 2.1 - All new res. and non-res. developments with 1000m2 or ten+ units provide at least 10% energy requirements from renewable.			Opt 2.2 - As with Option 2.1, but where feasible.			Opt 2.3 - Support stand alone and roof mounted renewable energy schemes, where site conditions make them feasible (criteria for assessment provided)			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	0	*	*	0	*	*	0	*	*	All	Potential medium and long term positive impacts for all options as they all promote new technology which has the potential to encourage the establishment of new enterprises
Employment	0	*	*	0	*	*	0	*	*	All	Potential medium and long term positive impacts for all options as they all promote new technology which has the potential to encourage the establishment of new enterprises and hence new employment opportunities
Minimise waste	0	0	0	0	0	0	0	0	0	Neutral	Neutral Waste impact overall.
Water quality	0	0	*	0	0	*	0	0	*	Opt 2.1	Potential improvement to water quality over time by the use of cleaner energy. Opt 2.1 will capture more proposals.
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	Difficult to determine as biodiversity likely to be affected by climate change in both a positive and negative way. The effect is hence neutral
Air quality	0	*	**	0	*	*	0	*	*	Opt 2.1	Improvement to air quality by reduction in use of energy resources and Carbon dioxide levels. Opt 2.1 will capture more proposals.
Energy	*	**	**	*	*	*	*	*	***?	Opt 2.1	The installation of renewables in major developments would provide a definite reduction in energy consumption. Opt 2.3 could bring about substantial energy reductions depending on affordability and planning restrictions
Landscapes and Townscapes	*/-	*/-	*/-	*/-	*/-	*/-	*/-	*/-	*/-	Neutral	Positive and negative impacts depending on how well the renewable energy technology is integrated into the design of development
Historic environment	0	0	0	0	0	0	0	#	#	Opt 2.1 and 2.2.	The provision of stand alone and roof mounted renewable energy schemes may impact upon the boroughs conservation areas.
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	No identified effect
Human health	0	0	0	0	0	0	0	0	0	Neutral	No identified health effect
Reduce poverty & exclusion	*	*	*	*	*	*	*	*	*	All	The inclusion of renewable energy technologies can bring energy bills down and help reduce fuel poverty.
Education	0	0	0	0	0	0	0	0	0	All	Although some marginal positive education impacts may occur from using Renewable Energy demonstrations, these are only secondary and therefore result in an overall neutral impact.

Reduce crime	0	0	0	0	0	0	0	0	0	0	Neutral	Renewable Energy not applicable to the reduction of crime.
Community welfare	*	*	*	*	*	*	*	*	*	*	All	Improved energy efficiency measures in community buildings will improve the overall comfort of the building and reduce fuel bills
Accessibility to services	0	0	0	0	0	0	0	0	0	0	Neutral	Renewable Energy not applicable to access to services.

**All options generally make a positive impact on the SA objective. Opt 2.1 is however making the most positive contribution as it is a requirement covering large developments which can integrate these considerations at the design stage**

FOR CONSULTATION

Issue 3 - Flood Risk																							
SUSTAINABLE ENVIRONMENT	Opt 3.1 - Consider development in line with the sequential test (PPG25). Flood risk will be determined from the most up to date information. Local flood risk assessments required.			Opt 3.2 - Planning applications for minor extensions within identified flood hazard areas should not raise significant issues unless (criteria provided).			Opt 3.3 - Take a risk based approach to assessing proposals for developments in line with criteria in PPG25.			Opt 3.4 - Employ the principle of 'balanced management' (social / econ. needs vs. flood risk mitigation.)			Opt 3.5 - The Council may require flood protection and mitigation measures in developments including works, or contributions to provide, improve and maintain defences.			Opt 3.6 - Unsustainable flood hazard solutions (culverting and other engineering solutions) will be scrutinised, in favour of environmentally sustainable alternatives.			Opt 3.7 - Require developers to manage surface water run-off as close to its source as possible. Sustainable urban drainage systems will be encouraged for all developments.			Most Sustainable Option	Comments (Effects)
	Objectives	Effects			Effects			Effects			Effects			Effects			Effects						
	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	#	#	0	0	0	0	#	#	0	0	*	#	0	*	#	0	*	#	0	*	Opt 3.4	Opt 3.1 and 3.3. may hinder development and hence economic growth in north Lewisham which is in a flood risk area but also the main growth area in the borough.
Employment	0	*-/	*-/	0	0	0	0	*-/	*-/	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Opt 3.1 and 3.3. can make certain types of employment locations desirable in flood risk areas which would otherwise be used for housing,







Issue 4: Air Quality								
SUSTAINABLE ENVIRONMENT Objectives	Opt 4.1 - Air quality assessments will be required where development may impact on air quality levels			Opt 4.2 - Assessment criteria for applications for major developments. Council will consider resisting development that may create detrimental effect on air quality.			Most Sustainable Option	Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	0	0	0	#	#	Opt 4.1	Minor long term negative economic impact from major developments being refused or altered if they create detrimental effect on air quality.
Employment	0	0	0	0	0	0	Neutral	Neutral impact in relation to employment.
Minimise waste	0	0	0	0	0	0	Neutral	Neutral impact in relation to minimising waste.
Water quality	0	*	*	0	*	**	Opt 4.2	A reduction in traffic related emissions will reduce pollution levels in surface run off and hence improve the chemical quality of water courses
Biodiversity	0	*	*	0	*	*	Opt 4.2	Both options will contribute to a positive impact as an improvement to air quality can reduce stresses on flora and fauna caused by secondary effects by acid rain, which is created by Nox and Sox emissions from fossil fuel combustion
Air quality	*	*	**	*	**	**	Opt 4.2	Both options will contribute to a significant positive impact on air quality. Opt 4.2 may result in developments being resisted that create detrimental effects and inclusion of mitigation measures.
Energy	0	0	0	0	0	0	Neutral	Neutral impact in relation to energy consumption
Landscapes and Townscapes	0	0	*	0	0	*	Opt 4.1	Deterioration to the build environment due to acid rain and soot from exhaust fumes will be a long term benefit of both options
Historic environment	0	0	0	0	0	0	Neutral	Neutral impact in relation to the historic environment.
Sufficient & decent housing	0	*	*	0	*	*		Ensuring that development is not located in areas of high air pollution will reduce exposure and hence negative health impacts caused by noise and traffic emissions
Human health	0	*	*	0	*	*		Ensuring that development is not located in areas of high air pollution will reduce exposure and hence negative health impacts caused by noise and traffic emissions
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Air quality not applicable to the reduction of poverty & exclusion
Education	0	0	0	0	0	0	Neutral	Neutral impact in relation to education.
Reduce crime	0	0	0	0	0	0	Neutral	Air quality not applicable to the reduction of crime.

Community welfare	0	*	*	0	*	*	Neutral	A reduction in air pollutants which are often traffic related will have reduction in noise. This is will help create a more pleasant environment for the local community
Accessibility to services	0	0	0	0	0	0	Neutral	Air quality not applicable to access to services.

**Both options are compatible. Option 4.2 is more specific and stronger option as this could lead to major developments that generate detrimental air quality to be refused or altered.**

FOR CONSULTATION

Issue 5: Contaminated Land & Hazardous Substances											
SUSTAINABLE ENVIRONMENT	Opt 5.1 - Development on land suspected of being contaminated, will require developers to investigate and identify remedial measures, using best practice mechanisms.			Opt 5.2 - Criteria for assessment of applications for a potentially polluting use (listed).			Opt 5.3 - Require any proposed or existing development containing hazardous substances to be stored to meet National Regulations.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	0	*/-	*/-	0	*/-	*/-	0	*/-	*/-	Opt 5.1	The options show positive and negative effects as the cost of remediation can hinder development, however the potential gains from increases in land value due after remediation may counter balance the associated costs and increase development potential around previous vacant and derelict land.
Employment	0	*	*	0	0	0	0	0	0	Neutral	Some positive impacts as the process of identifying and remediating land will provide some employment opportunities
Minimise waste	0	0	*	0	*	*	*	**	**	Opt 5.3	Opt 5.3 will result in the reduction of hazardous substances which will result in a significant positive impact.
Water quality	0	**	**	0	*	**	*	**	**	Opt 5.3	All options propose reduces the risk of pollutants being present in or exposed to the environment and hence protect our water courses from contamination
Biodiversity	0	*	**	0	*	*	*	*	**	Opt 5.1/5.3	All options propose reduces the risk of pollutants being present or exposed to the environment and hence protect biodiversity from harmful substances
Air quality	0	*	*	*	**	**	*	*	*	Opt 5.2	Opt 5.2 includes traffic related pollutants and therefore results in the most positive impacts.
Energy	#	0	0	*	*	*	#	0	0	Opt 5.2	Opt 5.2 suggests the siting of polluting developments to include the use of sustainable modes of transport and waste minimisation which both reduce energy consumption
Landscapes and Townscapes	*	**	**	0	*	*	0	*	*	Opt 5.1	Opt 5.1 will result in the reduction and amount of derelict, degraded and underused land.
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to the historic environment.
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to sufficient and decent housing.
Human health	0	0	*	0	0	*	0	*	*	Opt 5.3	Opt 5.3 will result in the reduction of hazardous substances which will result in the most positive impact on human health.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Contaminated land & hazardous substances not applicable to the reduction of crime.
Education	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.

Reduce crime	0	0	0	0	0	0	0	0	0	0	Neutral	Contaminated land & hazardous substances not applicable to the reduction of crime.
Community welfare	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to education.
Accessibility to services	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to education.
<p><b>All the options are compatible. Opt 5.1 is positive, however only requires an investigation. Option 5.3 applies to existing buildings and therefore covers more development and can be applied more quickly in the short term.</b></p>												

FOR CONSULTATION

Issue 6: River Water Quality, Water Resources and Infrastructure														
SUSTAINABLE ENVIRONMENT	Opt 6.1 - Seek to protect and improve the water quality to ensure healthy natural habitats. Ensure adequate sewerage infrastructure capacity and use of SUDS.			Opt 6.2 - Developments should consider impact of proposals on water demand and existing capacity. Protect & conserve supplies in order to secure long term needs.			Opt 6.3 - Criteria for development which increases the demand for off-site service infrastructure (water supply, sewer drainage and treatment).			Opt 6.4 - The expansion of water supply or waste water facilities will be permitted provided that the need outweighs any adverse land use or environmental impact.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	*	0	*	*	0	0	*	0	*	**	Opt 6.4	Ensuring a pleasant river environment will aid development opportunities along the river network. Expansion of water supply and waste facilities will allow for increased development and economic growth.
Employment	0	0	0	0	*	*	0	0	0	0	*	*	Opt 6.4	Expansion of water supply and waste facilities will allow for increased development and therefore employment.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to minimising waste.
Water quality	*	**	**	0	*	*	*	*	**	0	#	#	Opt 6.1	Opt 6.4 can lead to a long term increase in water usage the potential for contamination by sewage
Biodiversity	0	*	*	0	0	*	0	*	*	0	#	#	Opt 6.1	Opt 6.4 requires development of facilities that may have a negative impact on existing natural habitats
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact in relation to air quality.
Energy	#	*	*	#	*	**	#	0	0	#	0	0	Positive/Neutral	Any development of infrastructure will increase energy consumption in the short term, though the conservation of water will have a positive effect in the medium and long term.
Landscapes and Townscapes	0	*	**	0	0	0	0	0	0	0	0	0	Opt 6.1	The protection and improvement of water quality as required by Opt 6.1 will improve the landscape & townscape.
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact
Sufficient & decent housing	0	0	0	0	0	*	0	0	0	0	*	*	Opt 6.4	Increasing water supply and waste facilities will result in a minor positive impact in allowing for sufficient and decent housing.
Human health	0	*	*	0	0	0	0	0	0	0	0	0	Opt 6.1	The protection and improvement of the riverine environment, Opt 6.1, improves the landscape and provide a sense of wellbeing for people. It also makes the river network a desirable place for recreational purposes
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact

Education	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact
Accessibility to services	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	No impact
<p><b>The options are compatible to some degree as they cover a range of issues. The negative impacts are minor enough for not to warrant mitigation measures. Opt 6.4 should however be considered carefully with regards to determining the significance of any negative environmental impacts</b></p>															

FOR CONSULTATION

Issue 7: Noise & Light Effects									
SUSTAINABLE ENVIRONMENT	Opt 7.1 - Seek to minimise the adverse impacts of noise, separate new noise sensitive development from major noise sources wherever practicable.			Opt 7.2 - Proposals for light-generating development, floodlights or otherwise obtrusive light may require a detailed light-impact survey			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	#	#	#	0	0	0	Neutral	Potential minor negative impact on economic growth if development that generates noise (which are usually employment related) are relocated or not allowed to proceed.	
Employment	0	0	0	0	0	0	Neutral	Potential minor negative impact if development that generate noise (which are usually employment related) are located to far away from services.	
Minimise waste	0	0	0	0	0	0	Neutral	Noise and light effects are not applicable to minimising waste.	
Water quality	0	0	0	0	0	0	Neutral	Noise and light effects are not applicable to water quality.	
Biodiversity	*	*	*	*	*	*	N/A	Light and Noise control will have a minor positive impact on biodiversity, as there will less disturbance in particular to fauna habitats.	
Air quality	0	0	0	0	0	0	N/A	Noise and light effects are not applicable to air quality.	
Energy	0	0	0	0	0	0	Neutral	No significant impacts	
Landscapes and Townscapes	0	0	0	0	*	*	N/A	Positive medium to long term impacts on townscapes if light pollution is controlled.	
Historic environment	0	0	0	0	*	*	N/A	Positive long term impacts on the historic environment if light pollution is appropriately controlled.	
Sufficient & decent housing	0	*	*	0	*	*	N/A	Noise control can lead to minor positive impact in relation to sufficient and decent housing.	
Human health	*	**	**	*	*	*	Opt 7.1, 7.2	Noise can lead to stress related symptoms hence opt 7.1 shows a significant positive impact	
Reduce poverty & exclusion	0	0	0	0	0	0	N/A	Noise and light effects are not applicable to reducing poverty and social exclusion.	
Education	0	0	0	0	0	0	Neutral	No significant impacts	
Reduce crime	0	0	0	0	0	0	Neutral	No significant impacts	
Community welfare	*	*	*	*	*	*	Neutral	No significant impacts	

Accessibility to services	0	0	0	0	0	0	Neutral	No significant impacts
Both options do not relate to each other as they control to separate issues (noise and light). Both options generally show positive impacts								

FOR CONSULTATION

Issue 8: Sustainable Use of Building Materials & Aggregates					
SUSTAINABLE ENVIRONMENT	Opt 8.1 - New developments will be encouraged to demonstrate an efficient use of building materials, including appropriate use of high quality materials and recycled aggregates, where appropriate.			Most Sustainable Option	Comments (Effects)
	Effects				
	S	M	L		
Objectives	#	0	*	N/A	Short term impact will suffer from upfront costs of high quality materials and recycled aggregates, which will in the longer term result in higher yield and savings.
Economic Growth	0	0	0	N/A	Neutral impact.
Employment	*	**	**	N/A	The reduction in the use of materials by using aggregates and re-use will result in a significant reduction in waste.
Minimise waste	0	*	*	N/A	Water quality will be marginally improved by the use of aggregate materials.
Water quality	0	*	*	N/A	Biodiversity will be marginally improved by the use of aggregate materials.
Biodiversity	0	*	*	N/A	Less energy demand by re-using materials will result in less emissions. Recycling aggregates could however create excess dust emissions and mitigation should hence include criteria for handling, storage and transportation of waste materials to the Council's Code of construction
Air quality	*	**	**	N/A	The reduction in the use of materials by using aggregates and re-use will result in a significant reduction energy used to produce new materials
Energy	*	**	**	N/A	Landscape and especially townscape can be significantly benefited by the use of high quality materials.
Landscapes and Townscapes	0	*	**	N/A	Use of high quality materials can have a positive impact on the historic environment. More importantly the re-use of existing materials can greatly enhance an historic environment.
Historic environment	0	*	*	N/A	The use of high quality materials will improve the overall quality of the building stock
Sufficient & decent housing	0	0	0	N/A	Not applicable.
Human health	0	0	0	N/A	Not applicable.
Reduce poverty & exclusion	0	0	0	N/A	Not applicable.
Education	0	0	0	N/A	Neutral impact.
Reduce crime	0	0	0	N/A	Not applicable.
Community welfare	0	0	0	N/A	Neutral impact.
Accessibility to services	0	0	0	N/A	Not applicable.

**Only one option has been presented. The option shows positive impacts on a number of objectives and only a minor negative impact for short term economic growth. The option is hence considered to be sustainable**

Issue 1: Development in Context									
URBAN DESIGN & CONSERVATION	Maximise intensity of use compatible with local context			Higher density development around existing centres and public transport nodes.			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	**	**	**	*	**	**	Opt 1.1	Maximising use, just not limited to town centres and public transport nodes would assist economic growth more greatly.	
Employment	0	*	*	*	*	**	Opt 1.2	Employment generation would be assisted greatly by high density development around employment sites and public transport nodes, providing improved access to employment.	
Minimise waste	#	0	0	#	0	0	Neutral	All development has an impact on waste generation in the short term due to demolition and reconstruction.	
Water quality	0	0	0	0	0	0	Neutral	The high density uses would result in less low density developments that could affect water quality. However this is countered by the impact from high densities and therefore more people.	
Biodiversity	0	0	0	0	*	*	Neutral	High density developments focused around major town centres would be more beneficial to biodiversity than developing on less densely developed sites	
Air quality	0	0	0	*	**	**	Opt 1.2	Air quality would be greatly improved by concentrating high density developments around public transport nodes, thus removing car dependency and improving traffic.	
Energy	#	#	#	#	#	#	Neutral	All development has negative effects on energy consumption	
Landscapes and Townscapes	*	**	**	*	*	*	Opt 1.1	Townscapes borough wide, not just within town centres would be improved if all developments were developed in a way that maximised use according to local context but this requires strong urban design policies.	
Historic environment	*	*	**	*	*	*	Opt 1.1	The historic environment borough wide would be improved with any development that occurred were compatible with the local context.	
Sufficient & decent housing	*	*	**	*	**	**	Opt 1.2	The provision of decent housing is more achievable and attractive to developers with high density development located where services and transport are already provided.	
Human health	0	0	0	0	0	0	Neutral	Neutral impact.	
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Neutral impact.	
Education	0	0	0	0	0	0	Neutral	Neutral impact.	
Reduce crime	*	*	*	*	*	*	Neutral	Both options will tend to reduce fear of crime in varied locations.	
Community welfare	0	0	0	0	0	0	Neutral	Neutral impact.	

Accessibility to services	0	*	*	*	**	**	Opt 1.2	Access to services can be assisted by high density development located in close proximity.
<b>Most Sustainable Option:</b>							<b>Opt 1.2</b>	The setting of high density development around town centres and transport modes has slightly more positive effects

FOR CONSULTATION

Issue 2: The Historic Environment								
URBAN DESIGN & CONSERVATION	Opt 2.1 - The Council will continue to protect and where possible enhance the historic environment of the borough.			Do Nothing'			Most Sustainable Option	Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	*	*	*	*	*	*	Opt 2.1	The protection of the historic environment will have a positive effect on the economy of the Borough by making it an attractive place for businesses to invest in.
Employment	0	0	0	0	0	0	Neutral	Neutral effect
Minimise waste	*	*	**	#	#	#	Opt 2.1	The retention and re-use of buildings will result in a reduction in building waste.
Water quality	0	0	#	?	?	?	Do Nothing?	Older buildings might not have water saving measures. However the effect of doing nothing is uncertain.
Biodiversity	**	**	**	#	#	#	Opt 2.1	Policies also include the protection of historic landscapes and ancient woodland in the Borough.
Air quality	*	*	**	*	*	**	Opt 2.1	Minor positive effect on air quality.
Energy	0	0	#	#	0	*	Opt 2.1	The retention and re-use of older buildings which are less energy efficient may have a long term negative effect on energy consumption. Redevelopment costs will have a short term negative effect.
Landscapes and Townscapes	**	**	**	##	##	##	Opt 2.1	Townscapes will benefit significantly from the protection and enhancement of the historic environment.
Historic environment	**	**	**	##	##	##	Opt 2.1	Protection and enhancement of historic environment is required by legislation
Sufficient & decent housing	*	*	*	#	*	*	Opt 2.1	Older style housing in attractive buildings is often at a relatively high density. The effect of redevelopment would have a positive effect in the longer term
Human health	*	*	*	0	0	#	Opt 2.1	A reduction in the quality of the historic environment and the sense of place and community it often provides might result in a long term indirect negative effect on human health

Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Neutral effect	
Education	0	0	0	0	0	0	Neutral	Neutral effect	
Reduce crime	0	0	0	0	0	0	Neutral	Neutral effect	
Community welfare	0	0	0	0	0	0	Neutral	Neutral effect	
Accessibility to services	0	0	0	0	0	0	Neutral		
<b>Most Sustainable Option:</b>							<b>Option 2.1</b>	Only option. Main positive impacts are on the physical environment, rather than social or economic.	

FOR CONSULTATION

**Issue 3: River Thames and Frontage and the River Network**

URBAN DESIGN & CONSERVATION	Opt 3.1 - Development should respect and enhance the character of the River Thames and the Ravensbourne River/Deptford Creek Network.						Do Nothing			Most Sustainable Option	Comments (Effects)
	Effects			Effects							
	S	M	L	S	M	L					
Economic Growth	0	*	*	0	*	*	Opt 3.1	Economic growth will be maintained by respecting and enhancing any character, especially the Boroughs waterways.			
Employment	0	0	0	0	0	0	Neutral	Neutral impact on employment.			
Minimise waste	0	0	0	0	0	0	Neutral	Neutral impact on waste generation			
Water quality	*	**	**	#	#	#	Opt 3.1	Significant positive impact on water quality by developments that respect and enhance the Boroughs waterways.			
Biodiversity	**	**	**	#	#	#	Opt 3.1	Development that respects the important biological diversity and qualities of the Thames and River networks			
Air quality	0	0	0	0	0	0	Neutral	Neutral impact on air quality			
Energy	0	0	0	0	0	0	Neutral	Neutral			
Landscapes and Townscapes	*	**	**	#	#	#	Opt 3.1	Townscapes, where respecting or enhancing the Boroughs Waterways will result in a positive impact by this option.			
Historic environment	*	*	*	#	#	#	Opt 3.1	A number of historic areas are located adjacent to the Boroughs Waterways and these areas will be enhanced by this option.			
Sufficient & decent housing	0	*	*	0	*	*	Neutral	A similar amount of housing could be provided by both options			
Human health	*	*	*	0	0	#	Opt 3.1	Enhancing the quality of development by the river and enabling public access will have a minor indirect positive effect on public health			
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	No impact on social exclusion			
Education	0	0	0	0	0	0	Neutral	Neutral effect			
Reduce crime	*	*	*	#	#	#	Opt 3.1	A lively and enhanced riverfront would reduce the fear of crime.			
Community welfare	0	0	0	0	0	0	Neutral	Neutral			

Accessibility to services	0	0	0	0	0	0	Neutral	Neutral
<b>Most Sustainable Option:</b>			<b>Opt 3.1</b>		Option to enhance the Thames has the larger number of positive effects			

FOR CONSULTATION

Issue 4: High Buildings														
URBAN DESIGN & CONSERVATION	Opt 4.1 - High buildings should be welcomed in locations identified by borough wide context studies			Opt 4.2 - High buildings ruled out in certain locations (context studies), & directed to major town centres.			Opt 4.3 - Allow high buildings subject to general location, height, massing and context standards.			Opt 4.4 - Include general criteria policy for judging the design quality of high buildings.			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	*	*	0	*	*	0	*	*	0	*	*	All	All will provide similar positive effects on economic growth.
Employment	0	*	*	*	*	*	0	0	*	0	0	0	Opt 4.2	This option will result in more high buildings located in major town centres where employment is generated.
Minimise waste	#	0	0	#	0	0	#	0	0	#	0	0	Neutral	Allowing high buildings will have short term indirect negative impacts by construction waste generation.
Water quality	#	#	#	#	#	#	#	#	#	#	#	#	Neutral	Increased occupancy and usage will mean a greater drain on water resources which can be minimised by water efficient buildings.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Generally neutral impact.
Air quality	0	0	0	*	*	*	0	0	0	0	0	0	Neutral	Impact on air quality is likely to be minimised if high traffic generating developments are located in town centres.
Energy	##	#	#	##	#	#	##	#	#	##	#	#	None	All options for high building construction will have a negative impact in the short term due to construction costs. Increase occupancy and use arising from tall buildings will inevitably lead to increase energy consumption but this can be minimised by energy efficient buildings.
Landscapes and Townscapes	*	*	*	*	*	*	**	**	**	**	**	**	Opt 4.3 & 4.4	Both Options 4.3 & 4.4 will result in being positive for both landscapes and townscapes as 4.3 will control location, height, massing and context while 4.4 will assist in achieving high quality design outcomes.
Historic environment	*	*	*	0	*	*	*	**	**	*	*	*	Opt 4.3	Effects on the historic environment will be minimised by this option 4.3.
Sufficient & decent housing	*	*	*	*	*	**	0	*	*	0	*	*	Opt 4.2	This option will most beneficially assist providing sufficient and decent housing by providing such housing in major town centres where services and transport are provided.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact on human health.

Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact on education.
Reduce crime	*	*	*	*	*	*	*	*	*	*	*	*	Neutral	All options are likely to have an effect on reducing crime - by providing a more lively environment in town centres for instance and by providing design standards that reduce the fear of crime.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	*	*	*	*	**	**	0	*	*	0	0	0	Opt 4.2	High buildings directed to major town centres will assist in improving access to services.
<b>Most Sustainable Option:</b>													<b>Opt 4.2</b>	High buildings ruled out in certain locations and located in major town centres close to public has the most positive effects. This option will most likely need to be amalgamated with Options 4.3 & 4.4 because these options mainly relate to the design of the building.

FOR CONSULTATION

Issue 5: Views and Landmarks								
URBAN DESIGN & CONSERVATION	Opt 5.1 - Maintain current set of views and landmarks			Opt 5.2 - Modify the criteria for selection of local views by changing criteria to include significant local 'vistas'.			Most Sustainable Option	Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	0	0	0	0	0	#	Opt 5.1	Economic growth may potentially be negatively affected by this additional constraint on high buildings, by limiting the provision of higher density buildings. This effect would however be long term and be expected to be very minor
Employment	0	0	0	0	0	0	Neutral	Views are not directly applicable to employment.
Minimise waste	0	0	0	0	0	0	Neutral	Neutral impact.
Water quality	0	0	0	0	0	0	Neutral	Neutral impact.
Biodiversity	0	0	0	0	0	0	Neutral	Neutral impact.
Air quality	0	0	0	0	0	0	Neutral	Neutral impact.
Energy	0	0	0	0	0	0	Neutral	Neutral impact.
Landscapes and Townscapes	*	*	*	**	**	**	Opt 5.2	Both townscapes and landscapes would be positively enhanced by including significant local vistas as a selection of local views.
Historic environment	*	*	*	*	**	**	Opt 5.2	The historic environment and historic vistas would be positively affected.
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Neutral impact.
Human health	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Neutral impact.
Education	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce crime	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	0	0	0	0	0	0	Neutral	Neutral impact.
<b>Most Sustainable Option:</b>							<b>Opt 5.2</b>	The inclusion of significant local vistas to the selection of local views will result in a positive enhancement of landscapes and townscapes as well as minor affect for the historic environment. This in outweighs any negative impact on economic growth.

Issue 6: Areas of Special Character														
URBAN DESIGN & CONSERVATION	Opt 6.1 - Retain Protection for all current Areas of Special Character			Opt 6.2 - Remove protection for Thames Area of SC			Opt 6.3 - Remove protection for Sydenham Ridge ASC			Opt 6.4 - Remove protection for the Blackheath ASC			Most Sustainable Option	Comments (effects)
	Effects			Effects			Effects			Effects				
Objectives	S	M	L	S	M	L	S	M	L	S	M	L		
Economic Growth	0	0	#	0	0	#	0	0	#	0	0	#	Neutral	All the options would result in some sort of negative impact on economic growth due to restrictions in the nature of some development. This would be in the longer term and be expected to be very minor.
Employment	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Water quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	General impact on air quality is neutral.
Energy	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Landscapes and Townscapes	**	**	**	#	##	##	#	##	##	#	##	##	Opt 6.1	Opt 6.1 seeks to include significant local vistas which is positive for both landscapes and townscapes, while Options 6.2,6,3 & 6,4 seek to remove protection which would create a negative impact.
Historic environment	**	**	**	#	##	##	#	##	##	#	##	##	Opt 6.1	The removal of protection of areas of special character would have a negative effect, where the inclusion of significant local vistas would be very positive.
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	General impact on sufficient and decent housing is neutral.
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Education	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
<b>Most Sustainable Option:</b>												<b>Opt 6.1</b>	Option 6.1 is the option with the most positive benefits. Options to remove ASC protection from other areas show negative impacts on the appearance of landscapes, townscapes and the historic environment. This protection would need to come from other policy designations.	

Issue 7: Improving the Image of the Borough - Reducing Crime and Fear of Crime - Inclusive & Accessible Environment									
URBAN DESIGN & CONSERVATION	Opt 7.1 - Carry forward current Lewisham Unitary Development Plan policies to meet these aims.			Do Nothing'			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	*	*	#	#	#	Opt 7.1	Reducing crime will assist economic growth as will improving the image of the Borough	
Employment	*	*	*	#	#	#	Opt 7.1	Reducing crime will assist employment as will improving the image of the Borough.	
Minimise waste	*	*	*	#	#	#	Opt 7.1	The Unitary Development Plan policies have a positive effect on waste reduction as there is some encouragement for the reuse of buildings, and the preservation of older buildings of merit.	
Water quality	0	0	*	0	0	#	Opt 7.1	The current policies in the Unitary Development Plan would have a positive long term effect on water quality by encouraging SUDS. The aim would be to have a more positive effect. These policies are being reviewed elsewhere in the process.	
Biodiversity	*	*	*	#	#	#	Opt 7.1	The Unitary Development Plan policies have a positive effect on biodiversity as they ensure appropriate landscaping, and protection of trees.	
Air quality	0	0	0	0	0	0	Neutral	The urban design policies do not directly refer to location of development, and therefore have a neutral effect on air quality	
Energy	#	#	#	#	#	#	Neutral	Both options would have negative effects as the current Unitary Development Plan policies only encourage energy efficiency. The specific policies are to be reviewed and assessed elsewhere in the Sustainability Appraisal.	
Landscapes and Townscapes	**	**	**	##	##	##	Option 7.1	The policies would have a positive impact. Not to control development in this way would have a very negative impact.	
Historic environment	*	*	*	##	##	##	Option 7.1	As above in respect of the historic environment	
Sufficient & decent housing	*	**	**	#	#	#	Opt 7.1	An inclusive and accessible environment will assist decent housing.	

Human health	*	*	*	#	#	#	Opt 7.1	Not carrying out these policies will have a negative indirect impact on human health
Reduce poverty & exclusion	*	*	*	#	#	#	Opt 7.1	An inclusive and accessible environment will assist in reducing social exclusion.
Education	0	0	0	0	0	0	Neutral	Neutral impact - carrying forward current policy.
Reduce crime	**	**	**	#	#	#	Opt 7.1	Significant positive impact on reducing the fear of crime
Community welfare	*	*	*	0	0	0	Opt 7.1	Assists community welfare.
Accessibility to services	*	*	**	#	#	#	Opt 7.1	Access to services will be improved by this option by ensuring that the environment is designed to enable accessibility.
<b>Most Sustainable Option:</b>				<b>Opt 7.1</b>			These policies designed to improve overall environment and amenity will have a positive impact. They will require review and being up-dated to be brought into line with new government guidance and London Plan standards.	

FOR CONSULTATION

Issue 1																							
EDUCATION , HEALTH & COMMUNITY FACILITIES	Opt 1 - Protect existing sites used (or previously used) for health, education and community facilities from redevelopment to other uses			Opt 2 - Ensure that health, education and community service needs arising from a development are provided			Opt 3 - Require major developments undertake a social impact assessment			Opt 4 - Encourage the provision of health, education and community facilities to locate in areas with good public transport			Opt 5 - Provide flexibility for health, education and community uses serving a very local area to locate in residential areas			Opt 6 - Facilitate the upgrade/redevelopment/improvement of existing facilities			Opt 7 - Ensure community facilities are located in appropriate places that both contribute to sustainability objectives and provide access for users			Most Sustainable Option(s)	Comments (Effects)
	Objectives	Effects			Effects			Effects			Effects			Effects			Effects						
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M		
Economic Growth	0	0	0	0	*	**	0	*	*	0	*	*	0	0	*	0	*	*	0	*	*	Opt 2,4,5,6 & 7	Options 2 shows long term positive impacts as a growth in housing provision will result in an increase in HEC facilities which contributes to economic growth
Employment	0	0	0	0	*	**	0	0	0	0	0	*	0	0	*	0	*	*	0	*	*	Opt 2,4,5,6 & 7	An increase in the HEC facilities will provide employment opportunities in the borough
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	#	0	0	0	0	0	Neutral	Minor negative impact for opt 6 as redevelopment creates additional waste
Water quality	0	0	0	0	0	0	0	0	0	0	0	*	0	0	*	0	0	0	0	0	*	Opt 4, 5 & 7	Water quality will be marginally improved in the long term should these facilities be located closer to public transport and less vehicle movements will result.
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	neutral	no significant effect

Air quality	0	0	0	0	0	0	0	0	0	0	0	*	*	0	*	*	#	0	0	0	*	*	Opt 4, 5 and 7	Location of facilities near good public transport facilitates will result in less car travel and improved air quality.
Energy	0	0	0	0	0	0	0	0	0	0	0	*	*	0	*	*	#	*	*	0	*	*	Opt 4 and 5	The location of services to local areas will reduce fossil fuel emissions from vehicles. Opt 6 will reduce energy usage with improvements to built fabric with changes in building regulations part L.
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	*	*	0	0	0	Opt 6	Improvements to the built fabric will improve the townscape
Historic environment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Opt 6 can be positive and negative as some of the older schools buildings have some local historic value. If protected this will be positive but if redeveloped to change character then negative impact.
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Human health	*	*	#	0	*	*	0	*	*	0	*	*	*	*	**	*	**	**	*	**	**	Opt 2, 3, 4, 5, 6 & 7	Opt1 will not be adequate in the long term with growing demand for facilities. All othe options have some positive impact as they all assume a current provision or addition of health facilities	
Reduce poverty & exclusion	*	*	#	*	*	**	0	*	*	*	*	*	*	**	**	*	*	*	*	*	*	Opt 5	This option allows flexibility and location in residential areas which will assist in providing affordability to essential services to the home.	

Education	*	*	#	*	*	**	0	*	*	*	*	*	0	*	*	*	**	**	*	**	**	Options 2,6 & 7	These options increase the no. of educational facilities and bring about improvements to the educational environment.
Reduce crime	0	0	*	0	0	*	0	0	*	0	0	0	0	0	*	0	0	*	0	0	*	Opt 1,2,3,5,6,7	Access to good HEC facilities can help reduce anti social behaviour
Community welfare	*	*	#	*	*	**	0	*	**	*	*	*	*	*	*	*	**	**	**	**	**	Opt 7	HEC facilities are a basic necessity for community welfare. Opt 1 shows a negative impact as long term needs will not be provided
Accessibility to services	*	*	#	*	*	**	*	*	*	*	**	*	*	*	*	*	**	**	*	**	**	Options 2, 4, 6 & 7	Direct positive impacts. Opt 1 shows negative impacts as long term needs will not be provided
<p><b>Options 2, 3, 4, 5,6 &amp; 7 show significantly positive impacts for some of the objectives. Option 1 takes a status quo stance and showed the most negative impacts on a long term basis.</b></p>																							

Issue 2 - New School Sites and Improvement of Existing School Sites																	
EDUCATION, HEALTH & COMMUNITY FACILITIES	EHCF 8 - New Secondary School on site of Lady well Leisure Centre			EHCF 9 - Identify temporary sites for schools while improvement programme is underway			EHCF 10 - Include criteria based policy to help determine planning applications for temporary school buildings			EHCF 11 - Protect historic schools from demolition			Most Sustainable Option	Comments (Effects)			
	Objectives			Effects			Effects			Effects					Effects		
	S	M	L	S	M	L	S	M	L	S	M	L					
Economic Growth	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Employment	0	*	*	0	0	*	0	0	*	0	0	*	Opt 8	New school will assist employment in the medium to long term.			
Minimise waste	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Water quality	0	0	0	0	0	0	0	0	0	*	*	*	Opt 11	Reduces the need for using natural resources			
Biodiversity	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Air quality	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Energy	#	0	0	0	0	0	0	0	0	*	*	*	Opt 11	Reduces the need for using natural resources			
Landscapes and Townscapes	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Historic environment	0	0	0	0	0	0	0	0	0	*	**	**	Opt 11				
Sufficient & decent housing	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Human health	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Reduce poverty & exclusion	0	*	*	0	*	*	0	0	0	0	0	0	Opt 8/9	The provision of improved educational establishments will assist the reduction of poverty & social exclusion over the long term.			
Education	*	**	**	*	*	**	*	*	*	*	**	**	Opt 8	New school rather than temporary schools will assist more positively to greater education, regardless of the location.			
Reduce crime	0	0	0	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.			
Community welfare	0	#	##	0	0	*	0	0	*	0	0	*	Opt 9/10/11	Option 8 will result in the loss of a community facility and therefore the options are more positive.			
Accessibility to services	#	#	##	*	**	*	0	0	*	0	*	*	Opt 9	Locating the new school on a recreational site will restrict access to these key services. The identification of temporary sites will assist in the short to medium term.			
<b>Most Sustainable Option:</b>													<b>Opt 9</b>	Most sustainable option as Option 8 will result in the loss of a community facility.			

Protecting Employment Land												
EMPLOYMENT LAND	E1 - Maintain current Strategic Employment Location Boundaries			E2A - Remove sites from Strategic Employment Locations			E2B - Add sites to Strategic Employment Locations			Most Sustainable Option	Comments (Effects)	
Objectives	Effects			Effects			Effects					
	S	M	L	S	M	L	S	M	L			
Economic Growth	*	*	*	*	*	*	*	*	*	Opt E1 & E2A and E2B	Difficult to predict whether the removal or addition of sites or the maintenance of the existing boundaries will contribute to economic growth. This would depend on the nature of replacement uses. In the absence of further information it is considered all three options could contribute to economic growth.	
Employment	*	*	*	#	#	#	*	*	*	Opt E1 & E2B	Difficult to predict whether the removal or addition of sites or the maintenance of the existing boundaries will contribute to the availability of jobs. This would depend on the nature of replacement uses. In the absence of further information it is considered all three options could contribute to job availability.	
Minimise waste	*	*	*	0	#	##	*	**	**	Opt E2B	It is considered that the removal of sites from the Strategic Employment Locations might reduce the borough's capacity to handle the waste stream from the borough.	
Water quality	#	#	#	*	*	*	#	0	*	E2A	Industrial sites generally have a lot of hard standing areas, and cause water run off. They do not therefore generally improve water quality. Industrial users are sometimes large consumers of water and therefore do not conserve water. The removal of sites from these locations, and consequently their redevelopment might improve water quality by increasing the amount of soft landscaping and improving natural drainage. Whether the amount of water conserved would be improved is uncertain in the absence of information on any proposed new development.	
Biodiversity	#	#	#	*	*	*	#	#	#	Opt E2A	There will be some positive effects on biodiversity depending on the nature of the alternative uses on the sites.	
Air quality	*	*	*	*	#	#	*	*	**	Opt E2B	The removal of sites from the Strategic Employment Location will result in a reduced capacity to deal with the transport and treatment of waste locally, and might result in people having to travel longer distances to access services such as car repairs and other local business services. A reduction in air quality might be the result.	
Energy	?	?	?	#	0	*	?	?	?	Opt E2A	It is difficult to judge the effect on energy of release of maintenance of sites - it is possible that sites in the SEL could be used for energy regeneration or recycling which has an effect on energy reduction. Removal of sites and associated redevelopment for other uses will have an energy cost associated with redevelopment but may have a longer term beneficial impact due to new energy efficient buildings.	
Landscapes and Townscapes	#	#	#	*	*	**	#	#	#	Opt E2A	The addition and/or removal of sites from the Strategic Employment Locations is likely to have an effect on the overall landscape and townscapes of the Borough.	
Historic environment	0	0	0	0	0	0	0	0	0	Neutral	These options are not relevant to the historic environment.	

Sufficient & decent housing	#	#	#	*	*	*	#	#	#	Opt E2A	The removal of Employment Sites from the Strategic Employment Locations could result in the redevelopment of some sites for housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	These options are not relevant to health.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	These options are not relevant to reduction in poverty and social exclusion.
Education	0	0	*	0	0	*	0	0	*	All options have long term beneficial impact	All these options involve some commercial use (including where sites are removed from SELs). Jobs provided on sites and thereby the opportunities for further training this might represent will have a beneficial impact.
Reduce crime	#	#	#	*	*	*	#	#	#	Opt E2A	Industrial sites often are not welcoming places and can act to increase the fear of crime. Redevelopment of sites removed from SELs would result in well designed locations that would reduce the fear of crime/
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	These options are not relevant to community welfare.
Accessibility to services	0	0	0	*	*	*	0	#	#	Opt E2A	The removal of sites from the SELs will result in an increase in the availability of community services as it is possible that parts of the sites could be developed for community uses.
<b>Most Sustainable Option:</b>										<b>Combination</b>	All the options score well as the removal, maintenance and adding of SELs all have variable advantages and disadvantages. Option E2A scores the most highly in terms of beneficial impacts.

FOR CONSULTATION

Defined Employment Land																							
EMPLOYMENT LAND	DEA 1 - Retain all the current Defined Employment Areas and refuse planning permission for changes of use away from business uses			DEA 2 - Remove protection for business/industrial uses in Defined Employment Areas			DEA 3 - Review appropriateness of retaining DEA , with a view to removing protection for business, industrial and commercial uses from a number of sites			DEA 4 - Allow for 100% residential development in Defined Employment Areas			DEA 5 - Allow 'mixed use' commercial and residential with an element of affordable housing (suggest 50%) in DEA. Also consider community facilities			DEA 6 - New development in Defined Employment Areas should be 100% affordable housing where possible			DEA 7 - Create new affordable employment floorspace by requesting contributions from large new developments			Most Sustainable Option	Comments (Effects)
	Objectives	Effects			Effects			Effects			Effects			Effects			Effects						
		S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M	L	S	M		
Economic Growth	*	*	*	#	#	##	#	#	#	#	##	##	0	**	***	#	##	##	*	*	**	Opt DEA5 and DEA 7	The option that is likely to make the greatest impact on economic growth is Option DEA 5, especially on some under-used employment land in the borough which has low levels of economic activity. New mixed use development is likely to be at a higher density and provide a greater variety of premises of better quality that will be attractive to new firms or provide space for smaller local firms to move into. Simple removal of protection of employment land status is not likely to result in economic growth as 100% housing development would be the likely result. There would be a small cumulative impact on the economy dependent on the number of homes built but this would be small in comparison with mixed use development. Option DEA 7 could be used to ensure that any new development would contribute to economic activity

Employment	0	0	*	#	##	##	#	#	##	#	##	##	0	**	***	0	0	#	*	*	*	Option DEA 5 And DEA 7	Option DEA 5 will create more employment opportunities if mixed use employment and housing development is allowed to occur on some poorly used employment areas in the borough with a low employment density and poorer quality buildings. Removing employment land protection from these sites without a policy promoting mixed use development in its place will likely result in developments largely consisting of housing due to land values. The cumulative effect of building a large number of housing developments will create some employment and there may be some effect on jobs due to for instance local retail spending, but this will be small and uncertain in comparison with mixed use development. Option DEA 1 might result in a small growth in employment numbers, but traditional business development in the form of industrial/warehouse units represents a less intensive use of space and is not likely to generate as much employment as a mixed use development.
Minimise waste	0	#	#	0	*	*	0	0	0	0	*	*	0	*	*	0	*	*	0	0	0	Opt DEA 2, 4, 5 & 6	All options that involve redevelopment of whatever nature will result in the creation of waste while the physical rebuilding is going on. It is difficult to quantify the amount of waste in a general sense that would be generated by the competing forms of development.
Water quality	0	0	0	0	*	*	0	0	*	*	*	*	0	*	*	0	*	*	0	0	0	Opt DEA 4	Replacing industrial uses with residential development will generally result in improved environmental outcomes. Water quality will be improved by replacement of hard



Reduce crime	0	0	0	*	*	*	0	0	*	*	*	*	**	**	**	*	*	*	0	0	0	Opt DEA 5	Options allowing for mixed use development will be most beneficial in reducing crime. Housing involving single uses will be less beneficial;. Industrial/business area in single uses often do not provide unthreatening environments.
Community welfare	0	0	0	0	0	0	0	0	0	0	0	0	0	*	*	0	0	0	0	0	0	Opt DEA 5	Mixed Use developments are most likely to attract development of associated community facilities
Accessibility to services	0	0	0	0	0	0	0	0	*	0	*	*	*	*	*	0	*	*	0	0	0	Opt DEA 5	Provision of mixed use development would provide increased access to services
<b>Most Sustainable Option:</b>																					<b>Opt DEA 4</b>	This option along with option DEA 5 scores well as industrial uses will be removed and environmental gain as well as social housing will be achieved. However this could have negative impact on employment, services and could hinder economic growth.	

FOR CONSULTATION

Other Employment Land											
EMPLOYMENT LAND	OTH 1 - Preserve all these sites in business/industrial use			OTH 2 - Remove protection from and allow redevelopment for mixed use commercial and housing or 100% housing			OTH 3 - Assess applications for the redevelopment of these sites flexibly on the basis of criteria			Most Sustainable Option	Comments (Effects)
	Effects			Effects			Effects				
	S	M	L	S	M	L	S	M	L		
Economic Growth	*	*	**	*	*	**	0	0	0	Opt OTH 1 & 2	Both preservation and removal of protection of these sites would be beneficial for economic growth for different reasons. This would depend on the nature of the uses in the redevelopment - housing development would possibly have a negative impact by reducing the vitality and variety of the local economy. Mixed use development could have a positive impact by renewing local business uses.
Employment	*	*	**	#	##	##	0	*	*	Opt OTH 1	Removal of protection will represent a significant negative impact on employment, as it is likely that due to land values redevelopment proposals would be 100% housing .
Minimise waste	#	#	#	*	*	*	0	0	*	Opt OTH 2	Waste minimisation could be assisted by removing 'dirty' industries that generate more waste than mixed use or 100% housing developments.
Water quality	0	#	#	0	*	*	0	0	*	Opt OTH 2	Removing industrial uses should generally result in improved water quality and conservation, although the introduction of residential uses may result in increased water usage . Many Industrial sites are hard surfaced with little landscaping, and redevelopment to modern standards would improve natural drainage and reduce surface water runoff.
Biodiversity	0	0	0	0	*	*	0	0	*	Opt OTH 2	Potential minor improvement for biodiversity by removing protection and allowing redevelopment for other uses which would allow for more landscaping using native species.
Air quality	0	#	#	0	*	*	0	0	*	Opt OTH 2	Potential minor improvement for air quality by removing protection and allowing redevelopment.
Energy	0	0	#	#	0	*	#	?	?	Opt OTH 2/3	There would be a short term negative effect on energy consumption arising from the energy costs of new development, which would in the long term be cancelled out by a saving in energy from new energy efficient developments. Option OTH 3 - results would depend on the nature of the redevelopment
Landscapes and Townscapes	#	#	#	*	*	**	0	*	*	Opt OTH 2	Townscapes, specifically will be improved by the removal of medium and heavy industries and replacement with mixed use developments.
Historic environment	0	#	#	*	*	*	0	0	*	Opt OTH 2	The historic environment would be more enhancement where located in close proximity to industrial sites that are redevelopment for mixed use purposes.
Sufficient & decent housing	0	#	#	0	*	**	0	*	*	Opt OTH 2	Redevelopment including residential uses will provide additional decent housing opportunities.

Human health	0	0	0	0	0	0	0	0	*	OPT 3	It is possible that in the longer term some of these sites might be redeveloped for health services which would have a positive indirect impact on human health.
Reduce poverty & exclusion	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact on reducing poverty & social exclusion.
Education	*	*	*	*	*	*	0	0	0	Neutral	Provision of local job opportunities would present opportunities for training if local people are able to take advantage of them
Reduce crime	0	0	0	0	*	*	?	?	?	OTH 1/2	Mixed use developments which are more intensively used over more hours of the day would result in more natural surveillance and a more lively environment and therefore reduce the fear of crime.
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	0	*	*	0	#	#	0	0	*	Opt OTH 1	Business that provide services that are not protected could be negatively affected. Redevelopment for a use that provided a local service would improve community services.
<b>Most Sustainable Option:</b>										<b>Opt OTH 2</b>	Opt OTH 2 scores strongly for environmental reasons as redevelopment of land for mixed use schemes will generally result in an improvement. However the economic and more important employment impacts from removing these protected areas could be significant.

FOR CONSULTATION

Office Development									
EMPLOYMENT LAND	OFF 1 - Direct larger office development to the Major Town Centres of Lewisham & Catford. Smaller office developments elsewhere			OFF2 - 'Do nothing' - allow office development in all locations			Most Sustainable Option	Comments (Effects)	
	Effects			Effects					
	S	M	L	S	M	L			
Economic Growth	*	**	**	#	#	##	Opt OFF 1	The borough has not succeeded in attracting office development to its major town centres in the past. It is considered that these locations however would have the most beneficial impact on economic growth by locating them in clusters of other supportive uses such as retail and leisure facilities.	
Employment	*	**	**	#	##	##	Opt OFF 1	As above for employment	
Minimise waste	#	##	##	#	#	#	Opt OFF 2	Office development is usually responsible for waste production.	
Water quality	#	#	#	#	#	#	Neutral	Water quality is likely to be affected by office development in whatever location	
Biodiversity	#	#	#	#	#	#	Neutral	Office development involving intensive use of land is likely to have negative impacts on biodiversity	
Air quality	*	*	*	#	#	#	Opt OFF 1	Air Quality could be assisted by office development locating in the borough, and providing jobs closer to Lewisham residents. Development in town centres where public transport is good will have more of a beneficial effect by reducing traffic movements.	
Energy	#	#	#	#	#	#	Neutral	All office development is a consumer of energy	
Landscapes and Townscapes	0	*	*	#	#	#	OFF1	Town centre office development can enhance the townscape and commercial character of these places.	
Historic environment	0	0	0	0	0	0	Neutral	Not applicable.	
Sufficient & decent housing	0	0	0	0	0	0	Neutral	Neutral impact.	
Human health	0	0	0	0	0	0	Neutral	Neutral impact.	
Reduce poverty & exclusion	*	*	*	*	*	*	Both options	By providing local job opportunities office development can indirectly reduce poverty and exclusion	
Education	*	*	*	*	*	*	Both options	By providing local job opportunities office development can indirectly improve education by providing training opportunities	

Reduce crime	*	*	*	0	0	0	Opt OFF 1	This option will present a minor positive effect for reducing crime.
Community welfare	0	0	0	0	0	0	Neutral	Neutral impact.
Accessibility to services	*	*	*	#	#	#	Opt OFF 1	Access to services would be enhanced by directing larger office developments closer to services in Major Town Centres,
<b>Most Sustainable Option:</b>							OFF1	This option was put forward as it was considered to be the only sustainable option to accommodate office development in the borough. Large office development would be directed to those places with good transport links and able to provide local facilities to office staff, and to increase the economic viability of the larger town centres in the borough, with a variety of smaller premises to meet local demand.

FOR CONSULTATION

	Employment Clusters & Creative Industries							
EMPLOYMENT LAND	CRE 1 - Identify 'Creative Quarters' where the Council will encourage development of creative enterprises			2 - Do not identify Creative Quarters			Most Sustainable Option	Comments (Effects)
	Effects			Effects				
	S	M	L	S	M	L		
Economic Growth	*	*	*	#	#	#	Opt CRE 1	The creation of a creative quarter will assist in economic growth over the short - long term by providing greater variety in the local economy, and therefore attract other businesses.
Employment	*	*	**	0	0	0	Opt CRE 1	Encouraging the development of creative industries will provide an increase in the range of employment opportunities for local people in the longer term.
Minimise waste	?	?	?	?	?	?	?	It is difficult to identify whether creative industries or different industries would generate different amounts of waste.
Water quality	0	0	0	?	?	?	?	It is highly likely that creative industries will reuse older buildings. The effect on water quality overall is uncertain.
Biodiversity	0	0	0	0	0	0	Neutral effect	Assuming the same buildings are retained then the effect on biodiversity will be neutral.
Air quality	0	0	0	0	0	0	Neutral effect	Assuming the same buildings are retained then the effect on air quality will be neutral.
Energy	0	0	0	0	0	0	Neutral effect	Assuming the same buildings are retained then the effect on energy will be neutral
Landscapes and Townscapes	*	*	*	0	0	0	Opt CRE 1	The identification of creative quarters by providing vitality and viability to the urban landscape and possibly reusing older industrial buildings will have a positive effect.
Historic environment	*	*	*	0	0	0	Opt CRE 1	As above especially in relation to the re use of older buildings.
Sufficient & decent housing	0	0	#	0	0	0	Opt CRE 2	Retention of buildings for the creative industries will possibly have a negative effect on providing sites for housing.
Human health	0	0	0	0	0	0	Neutral effect	Neutral impact.

Reduce poverty & exclusion	0	0	0	0	0	0	Neutral	Neutral impact.	
Education	0	0	*	0	0	0	Opt CRE 1	The creation of creative clusters will increase a range of job opportunities which might lead to more training opportunities for local people providing they are able to access them.	
Reduce crime	0	0	0	0	0	0	Neutral	Neutral impact.	
Community welfare	*	*	*	0	0	0	Opt CRE 1	The creation of a creative quarter will add to a sense of identity and a sense of place which will indirectly promote community activities and welfare.	
Accessibility to services	0	0	0	0	0	0	Neutral effect	Neutral impact.	
<b>Most Sustainable Option:</b>				<b>Opt CRE 1</b>			The option to identify and retain creative quarters or clusters builds on the Creative Lewisham Strategy adopted by the Council. The only direct negative effect identified is one concerning the provision of housing sites. This could be mitigated by the provision of sufficient housing sites elsewhere in the borough to meet targets.		

FOR CONSULTATION

Live/Work Units														
EMPLOYMENT LAND	LW1 - Live-work developments should be welcome in Defined Town Centres, and locations associated with Local Shopping Parades where the use does not conflict with res amenity			LW2 - Live-work developments should only be allowed in attractive older workshop/warehouse buildings as a way of ensuring their continued use			LW3 - Live-work developments should be refused planning permission in favour of mixed use commercial and residential development or 100% residential development			Most Sustainable Option	Comments (Effects)			
	Objectives			Effects			Effects					Effects		
	S	M	L	S	M	L	S	M	L					
Economic Growth	0	*	*	0	*	*	*	*	**	Opt LW3	Mixed use commercial and residential developments would most greatly assist economic growth over live-work units.			
Employment	*	*	0	*	*	*	#	0	*	Opt LW2	For employment purposes, only allowing live-work units in attractive older workshops/warehouse buildings will assist in ensuring their continued use and will benefit these types of employment uses more greatly.			
Minimise waste	#	0	0	*	*	*	0	0	0	Opt LW2	It is difficult to gauge the precise sustainability effects of options LW1 and LW3 as the options do not specify whether the new development would reuse older buildings. LW2 is clearly the most sustainable option as it specifically relates to the re-use of buildings.			
Water quality	0	0	0	0	0	0	0	0	0	Neutral	These options appear to all have a neutral effect on water quality			
Biodiversity	0	0	0	0	0	0	0	0	0	Neutral	These options appear to all have a neutral effect on biodiversity			
Air quality	*	*	*	*	*	*	0	0	#	Option LW1 or LW2	It is likely that granting permission for live/work developments would have a minor positive impact on air quality by reducing the need to travel to work			
Energy	#	0	0	0	0	#	#	0	#	Option LW1 or LW2	Redevelopment options always involve an energy expense involved with construction costs. Re use of older less energy efficient buildings may have an energy cost in the longer term. Option LW3 most likely involves higher intensity development which may also have higher energy costs.			
Landscapes and Townscapes	*	*	*	*	**	**	0	0	*	Opt LW2	Workshops and warehouses can be restored and their use maintained by allowing this flexible employment and residential use, which will most greatly assist townscapes.			

Historic environment	0	0	0	*	*	**	#	#	#	Opt LW2	The historic environment will mostly be enhanced and protected by allowing live-work developments in older workshops and warehouses.
Sufficient & decent housing	0	*	*	0	*	*	*	**	**	Opt LW3	Opt LW3 will result in the most amount of housing which will provide the greatest amount of sufficient and decent housing.
Human health	0	0	0	0	0	0	0	0	0	Neutral	Neutral
Reduce poverty & exclusion	0	0	*	0	*	*	*	*	*	Opt LW3	Option LW3 is most likely to assist in reducing social exclusion by being able to provide associated social facilities
Education	0	0	0	0	0	0	0	*	*	Opt LW3	Option LW3 is most likely to have indirect effects in promoting education by providing more job opportunities
Reduce crime	*	*	*	*	*	*	*	*	**	Opt LW3	Most sustainable for reducing crime.
Community welfare	0	0	0	0	0	0	0	0	0	Neutral	Neutral
Accessibility to services	0	0	0	0	0	0	0	0	0	Neutral	Neutral
<b>Most Sustainable Option</b>										<b>Opt LW2 &amp; LW3</b>	Both these options are considered to be more sustainable than option LW1, which is the current practice.

FOR CONSULTATION

## Appendix D – Preferred Options SA

### Sustainability Appraisal of the Preferred Options policies

**Key for appraisal tables:**

<b>SA Objective</b>	Sustainability appraisal objectives	
<b>Effect</b>	Likely impact on the objective caused by applying the preferred option	
<b>Significance of effect</b>	--	Potentially significant adverse impact
	-	Potential adverse impact
	0	No impact
	+	Potential beneficial impact
	++	Potentially significant beneficial impact
	?	Uncertain or insufficient information on which to determine potential impacts
	+/-	Positive and negative impacts where benefits and drawback can appear to be neutral or display impacts in their own right
<b>Timescale</b>	S	Short term effect (predicted to occur between 0 – 5 yrs from implementation)
	M	Medium term effect (predicted to occur between 5 – 13 yrs from implementation)
	L	Long term effect (predicted to occur over 13 yrs and beyond the plan period)
<b>Cause</b>	D	Direct effect (following a direct link of cause and effect)
	I	Indirect (secondary) effects happen away from the original effect or follow a complex pathway. These include <u>cumulative</u> effects, cause by the effects of several preferred options; and, <u>synergistic</u> effects, producing a total effect greater than the sum of the individual effects
<b>Mitigation/Enhancement measures</b>	Measures that can be implemented to neutralise adverse effects or bring improvements to the predicted levels of impact	

<b>H1 Affordable housing: Thresholds and amount</b>						
Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more, the Council will seek to secure 35% of new private residential build as affordable housing.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Additional housing and population will contribute to economic growth.	+	P L	I	Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low-income earners.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and Biodiversity	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	It is assumed that a mix of housing will not impact on the physical environment constraints, as it is not likely to involve any difference in external building size.	+	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral. No direct impact.				Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option seeks provision of 35% affordable housing. This will assist the 9.3% of households in housing need.	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.  Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Ensure walking and cycling are promoted as part of any housing development. New housing areas should be linked with town centres, public transport and community facilities, including those for health and education.	+	P L	I	Plans should ensure that proposals do not have significant health impacts.

14	Reduce poverty & exclusion	The provision of 35% affordable housing contributes to mixed and balanced communities. This will assist the 9.3% of households in housing need.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Affordable housing may create demand for additional and specialised education facilities.	-/+	T L	I	New development to contribute to the provision of education through appropriate planning obligations.
16	Reduce crime	Sufficient and decent housing, including affordable housing, may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Affordable housing provision creates a beneficial mix in housing supply.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Generally neutral. No direct impact.				Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.

**Comment:**

The policy will ensure that new housing development will contribute to affordable housing and that a development of 10 or more dwellings will need to make a contribution. Seeking a target of 35% affordable housing has a positive impact, as it will contribute towards social objectives especially sufficient and decent housing, reducing poverty and exclusion and community welfare. The cumulative impacts of additional housing can be dealt with through the implementation of other policies.

**H2 Creating mixed and balanced communities**

Where a site falls within an area which has existing high concentrations of social rented housing, the Council will seek, in agreement with developers, for any affordable housing contribution to be provided in a way which assists in securing a more balanced social mix within that locality in order to establish and sustain 'viable balanced communities'. This would include more flexible tenures such as 'part ownership' and other shared equity schemes or other types of arrangement as considered appropriate. 'Cash in lieu' payment will not normally be accepted by the Council.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Additional housing and population can contribute to economic growth.	-	P L	I	Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low income earners.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and	Generally neutral. No direct impact.				

	Biodiversity					
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	It is assumed that a mix of housing will not impact on the physical environment constraints, as it is not likely to involve any difference in external building size.	+	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral. No direct impact.				Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option seeks a balance in housing provision and the tenure provided. This will assist in the overall aim of housing provision.	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.  Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Ensure walking and cycling are promoted as part of any housing development. New housing areas should be linked with town centres, public transport and community facilities, including those for health and education.	-	P L	I	Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	The preferred option contributes to mixed and balanced communities.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Additional housing may create demand for increased education facilities.	-/+	T L	I	New development to contribute to the provision of education through appropriate planning obligations.
16	Reduce crime	Sufficient and decent housing may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Preferred option seeks to create a beneficial mix in housing supply contributing to community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Generally neutral. No direct impact.				Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.

**Comment:**

The preferred option ensures that mixed and balanced communities are created and seeks to avoid a concentration of social housing in one area. Positive contributions are

made towards social objectives seeking community welfare and reducing poverty and exclusion.

### H3 Affordable housing: Tenure

The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites. Developer's would be required to demonstrate a mechanism for retaining affordable housing in perpetuity.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Additional housing and population will contribute to economic growth.	+	P L	I	Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low-income earners.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and Biodiversity	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	It is assumed that a mix of housing will not impact on the physical environment constraints, as it is not likely to involve any difference in external building size.	+	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral. No direct impact.				Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option seeks a tenure mix for affordable housing. This will assist the 9.3% of households in housing need.	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.  Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Generally neutral. No direct impact.				Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty &	A tenure mix for affordable housing	+	P	I	Ensure housing developments have

	exclusion	contributes to mixed and balanced communities. This will assist the 9.3% of households in housing need.		S		an appropriate mix of dwellings.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Sufficient and decent housing, including affordable housing, may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Tenure mix contributes to a suitable housing supply and decent housing aids community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Generally neutral. No direct impact.				Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.

**Comment:**

The policy will ensure that a suitable tenure mix is provided in affordable housing developments. This will have a positive impact, as it will contribute towards social objectives especially sufficient and decent housing, reducing poverty and exclusion and community welfare.

**H4 Housing mix – affordable housing**

Affordable housing developments of 15 or more dwellings will be required to provide where practicable, the following overall housing size mix:

Dwelling Size/Tenure	Social Rented Housing	Intermediate Housing
1 bedroom	25%	45%
2 bedroom	40%	45%
3 bedroom	30%	10%
4 bedroom	5%	

No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Additional housing and population will contribute to economic growth.	+	P L	I	Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low-income earners.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						

3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and Biodiversity	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	It is assumed that a mix of housing will not impact on the physical environment constraints, as it is not likely to involve any difference in external building size.	+	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral. No direct impact.				Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option seeks a tenure mix for affordable housing. This will assist the 9.3% of households in housing need.	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.  Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Generally neutral. No direct impact.				Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	A housing mix for affordable housing contributes to mixed and balanced communities. This will assist the 9.3% of households in housing need.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Sufficient and decent housing, including affordable housing, may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Housing mix contributes to a suitable housing supply and decent housing aids community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Generally neutral. No direct impact.				Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.
<b>Comment:</b>						

The policy will ensure that a suitable housing mix is provided in affordable housing developments. This will have a positive impact, as it will contribute towards social objectives especially sufficient and decent housing, reducing poverty and exclusion and community welfare. This contributes to meeting housing need and creating mixed and balanced communities.

### H5 Housing mix – market housing

For market housing, the Council will seek an appropriate mix of dwellings within a scheme, having regard to the following criteria:

- a) The physical character of the site or building and its setting;
- b) The previous or existing use of the site or building;
- c) Access to private gardens or communal garden areas for family units;
- d) The likely effect on demand for car parking within the area;
- e) The surrounding housing mix and density of population; and
- f) The location of schools, shops and open spaces.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Additional housing and population will contribute to economic growth.	+	P L	I	Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations and other plans can make provisions for assisting unemployed and low-income earners.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and Biodiversity	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	It is assumed that a mix of housing will not impact on the physical environment constraints, as it is not likely to involve any difference in external building size.	+	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral. No direct impact.				Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option provides housing mix criteria for market housing. This will ensure an appropriate dwelling mix to meet	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.

		housing need.				Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Generally neutral. No direct impact.				Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	A housing mix contributes to mixed and balanced communities.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Sufficient and decent housing, may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Housing mix contributes to a suitable housing supply and decent housing aids community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Generally neutral. No direct impact.				Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.
<p><b>Comment:</b> The policy will ensure that a suitable housing mix is provided as part of market housing developments. This will have a positive impact, as it will contribute towards social objectives especially sufficient and decent housing, reducing poverty and exclusion and community welfare. This contributes to meeting housing need and creating mixed and balanced communities.</p>						

<p><b>H6 Conversion of residential property</b> The permanent conversion of larger dwelling houses into two or more self-contained units will be considered subject to consideration of the following criteria:</p> <p>(a) The scheme results in the provision of an increase in suitable accommodation;</p> <p>(b) The size of the dwelling house to be converted is not less than 130 square metres net as originally constructed;</p> <p>(c) Suitable family accommodation is provided as part of the conversion in the form of a dwelling with three or more bedrooms;</p> <p>(d) The character of the buildings or neighbourhood or the amenities of neighbouring properties is not adversely affected;</p> <p>(e) The safe movement of emergency and refuse vehicles or other essential traffic, and pedestrians, is not adversely affected by additional on-street parking;</p> <p>(f) The dwelling is not a house in multiple occupation (HMO) which provides a satisfactory standard of accommodation for those who need short term relatively low cost accommodation; and</p> <p>(g) Sufficient area of the original garden is retained and provides an adequate setting for the converted building and enough private open space for the use of the intended occupants.</p>						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
Economic						

1	Economic Growth	Generally neutral impact. Although additional population can contribute to economic growth.	0	P L	I	
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Shared facilities and the generally minimal construction needed for a conversion as opposed to a new build contributes to reduced waste.	+	P S	D	Provide space for recycling facilities in development and encourage the application of the waste hierarchy. Reuse and recycling of construction /demolition waste part of a separate preferred option.
4	Water resources	Population increase may have adverse impact on water quality.	-	P S	I	Cumulative impact of housing needs to be recognised. Water quality, consumption and recycling measures needs to be included as part of construction.
5	Open Space and Biodiversity	Conversions will reduce demand for building land and impacts on open space and biodiversity.	+	P S - L	D	Housing developments should provide on-site open space. Sensitive building design in and near areas of open space can reduce impacts on biodiversity.
6	Air quality	Additional housing is expected to adversely affect CO2 emission (construction, occupation, energy needs and use outside the home, use of private vehicles, under provision of public transport).	--	P S - L	D	Housing to be built in accordance with sustainable design and energy reduction policies.
7	Transport	Increase in the boroughs population has potential adverse transport impacts - potential increase in car use and under provision of public transport.	+/-	P S - L	I	Need to ensure conversions are located close to public transport. Need to provide opportunities for car free schemes. Council to support and lobby for improved public transport in the borough.
8	Energy and Climate Change	Additional housing is expected to adversely impact CO2 emission (construction, occupation and energy needs and use outside the home).	--	P S - L	D	Housing to be built in accordance with sustainable design and energy reduction policies.
9	Flood Risk	Conversions may be located in areas subject to localised flooding and/or near the Thames River. Increase in property numbers and possible increase in hard standing areas can contribute to an increase in flood risk.	-	P S - L	I	Land in the major growth corridor is affected by flooding as identified by the Environment Agency flood maps. There is flood risk if the Thames Barrier were to fail. Flood assessments to be carried out as part of the development assessment process and advice followed in accordance with PPS 25. The area of

						'hard landscaping' should be minimised and on-site open space provided to ensure infiltration.
10	Landscapes and Townscapes	Additional housing will have an impact on the Borough's landscape and townscape.	0	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	The policy option will place pressure on existing buildings and could potentially affect valued heritage features.	-/+	P S - L	D	Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	Allowing conversions may increase the number of residential units and therefore contribute to ensuring that there is sufficient housing available to meet demand.	++	P S - L	D	Ensure housing developments have an appropriate mix of dwellings.  Annual monitoring of affordable housing should be carried out to evaluate delivery.
13	Human health	Ensure walking and cycling are promoted as part of any housing development.	-	P L	I	Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	The preferred option contributes to mixed and balanced communities.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Additional housing may create demand for increased education facilities.	-/+	T L	I	New development to contribute to the provision of education through appropriate planning obligations.
16	Reduce crime	Sufficient and decent housing may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Preferred option seeks to ensure additional housing and a beneficial mix in supply contributing to community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Allowing conversions ensures efficient use of housing stock accessible to town centres and other services.	+	P S - L	I	Other plans to note the location of additional housing to ensure effective service delivery.
<p><b>Comment:</b>          Allowing conversions and change of use to residential may contribute to meeting housing demand without the construction of new residential units. A positive benefit associated with this may be a reduction in the consumption of materials and resources and reduced construction waste. As conversions and changes of use will be undertaken on existing buildings allowing such developments is likely to result in the use of previously developed land.</p>						

### H7 Specialist and special needs housing

Specialist and special needs housing falling within classes C2 and C3 of the Use Classes Order will need to:

- (a) Meet a proven local need (for example by being within the approved forward plans of a relevant health and/or social service agency);
- (b) Provide accommodation in a location and of a type that is well designed to meet the needs of the particular client group;

- (c) Be accessible to local shopping facilities, public transport and amenity space;  
 (d) Include accommodation for any residential staff in accordance with relevant requirements;  
 (e) Be larger than 130 square metres net as originally constructed, if it is a change of use; and  
 (f) Have regard to the existing distribution of similar types of accommodation within the area to avoid a concentration.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral impact. Although additional population can contribute to economic growth.	0	P L	I	
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Shared facilities can contribute to reduced waste.	+	P S	D	Provide space for recycling facilities in development and encourage the application of the waste hierarchy. Reuse and recycling of construction /demolition waste part of a separate preferred option.
4	Water resources	Population increase may have adverse impact on water quality.	-	P S	I	Cumulative impact of housing needs to be recognised. Water quality, consumption and recycling measures needs to be included as part of construction.
5	Open Space and Biodiversity	Housing development may impact provision of open space if land available for development is limited.	-	P S - L	D	Housing developments should provide on-site open space. Sensitive building design in and near areas of open space can reduce impacts on biodiversity.
6	Air quality	Additional housing is expected to adversely affect CO2 emission (construction, occupation, energy needs and use outside the home, use of private vehicles, under provision of public transport).	--	P S - L	D	Housing to be built in accordance with sustainable design and energy reduction policies.
7	Transport	Increase in the boroughs population has potential adverse transport impacts - potential increase in car use and under provision of public transport.	+/-	P S - L	I	Need to ensure major developments located close to public transport or where this can be improved or provided as part of the scheme. Need to provide opportunities for car free schemes. Council to support and lobby for improved public transport in the borough.
8	Energy and Climate Change	Additional housing is expected to adversely impact CO2 emission (construction, occupation and energy needs and use	--	P S - L	D	Housing to be built in accordance with sustainable design and energy reduction policies.

9	Flood Risk	Additional housing may be located in areas subject to localised flooding and/or near the Thames River. Increase in property numbers and possible increase in hard standing areas can contribute to an increase in flood risk.	-	P S - L	I	Land in the major growth corridor is affected by flooding as identified by the Environment Agency flood maps. There is flood risk if the Thames Barrier were to fail. Flood assessments to be carried out as part of the development assessment process and advice followed in accordance with PPS 25. The area of 'hard landscaping' should be minimised and on-site open space provided in higher density developments to ensure infiltration.
10	Landscapes and Townscapes	Additional housing will have an impact on the Borough's landscape and townscape.	0	P S - L	D	Sustainable construction techniques should be used and buildings built to the highest design quality standards.
11	Historic environment	Generally neutral impact.	0	P S - L	D	Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option provides a range of housing types. This will assist in the overall aim of housing provision.	++	P S - L	D	Annual monitoring should be carried out to evaluate delivery.
13	Human health	Ensure walking and cycling are promoted as part of any housing development. New housing areas should be linked with town centres, public transport and community facilities, including those for health and education.	-	P L	I	Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	The preferred option contributes to mixed and balanced communities and to the provision of a specialist housing need.	+	P S	I	Ensure housing developments have an appropriate mix of dwellings.
15	Education	Additional housing may create demand for specialist education needs/facilities.	-/+	T L	I	New development to contribute to the provision of education through appropriate planning obligations.
16	Reduce crime	Sufficient and decent housing may improve quality of life and have a positive reduction in crime rates. Increased population can improve natural surveillance.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Preferred option seeks to create a beneficial mix in housing supply contributing to community welfare.	+	P ?	I	Ensure housing developments have an appropriate mix of dwellings.
18	Accessibility	Locate housing close to services, improve the physical connections and promote	+	P S - L	I	Ensure housing is integrated with surrounding services and accessible

		mixed-use where appropriate.				paths provided. Other plans to note the location of additional housing to ensure effective service delivery.
<b>Comment:</b> Specialist housing contributes to meeting a housing demand and impacts positively on a range of social objectives.						

<b>H8 Lifetime homes and wheelchair accessible homes</b>						
All new residential dwellings should be built to Lifetime Homes Standards and 10 per cent of all new dwellings should be wheelchair accessible or easily adapted for those using a wheelchair. This includes all new build, conversions and flatted development.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Open Space and Biodiversity	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Generally neutral. No direct impact.				
8	Energy and Climate Change	Generally neutral. No direct impact.				
9	Flood Risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	There will be a physical impact.	-/+	P S - L	D	Buildings need to be built to the highest design quality standards to ensure an enhanced built environment.
11	Historic environment	The policy option could potentially affect valued heritage features.	-/+	P S - L	D	Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option provides for accessible housing. This will assist in the overall aim of housing provision.	++	P S - L	D	Annual monitoring should be carried out to evaluate delivery.
13	Human health	Ensures a degree of independent living therefore contributing to a healthy lifestyle.	+	P L	I	Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	The preferred option contributes to mixed and balanced communities and reduces exclusion through accessibility.	+	P S	I	Annual monitoring should be carried out to evaluate delivery.
15	Education	Generally neutral. No direct impact.				

16	Reduce crime	Sufficient and decent housing may improve quality of life, reduces social exclusion and can have a positive reduction in crime rates.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Preferred option seeks to create a beneficial mix in housing supply contributing to community welfare.	+	P ?	I	Annual monitoring should be carried out to evaluate delivery.
18	Accessibility	Housing and its surrounds will be accessible.	+	P S - L	I	Ensure housing is integrated with surrounding services and accessible paths provided. Other plans to note the location of additional housing to ensure effective service delivery.
<b>Comment:</b> Accessible housing and provision for wheelchair housing increases accessibility and contributes to the provision of decent housing. Social exclusion can be reduced and health and community welfare improved.						

<b>H9 Gypsy and Travellers</b>						
The Council will continue to assess and provide for the identified needs of Gypsy and Travellers in appropriate locations.						
Gypsy and Travellers sites will be assessed against the following criteria:						
(a) It is accessible to local shops, services and community facilities in particular schools and health services;						
(b) It has safe and convenient access to the road network;						
(c) It has provision for parking, turning, service and emergency vehicles and servicing of vehicles;						
(d) The activities do not have an adverse impact on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site;						
(e) It has a supply of essential services such as water, sewerage and drainage and waste disposal; and						
(f) It is designed and landscaped to a high standard.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	There will be waste generated from residents.	--	P S	D	Provide space for recycling facilities on-site and encourage the application of the waste hierarchy. Reuse and recycling of construction /demolition waste part of a separate preferred option.
4	Water resources	Increased population and site use can have negative impacts on water resources.	-	P S	I	Cumulative impact of housing needs to be recognised. Water quality, consumption and recycling measures needs to be included as part of construction.

5	Open Space and Biodiversity	Need to ensure that sites do not impact on open space and biodiversity.	-	P S - L	D	Sufficient and designated open space needs to be provided on-site and impacts on biodiversity reduced.
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Increase in the boroughs population has potential adverse transport impacts - potential increase in car use and under provision of public transport.	+/-	P S - L	I	Need to ensure major developments located close to public transport or where this can be improved or provided as part of the scheme. Need to provide opportunities for car free schemes. Council to support and lobby for improved public transport in the borough.
8	Energy and Climate Change	Additional housing is expected to adversely impact CO2 emission (construction, occupation and energy needs and use outside the home).	--	P S - L	D	Sustainable design and energy reduction policies should be used.
9	Flood Risk	Sites may be located in areas subject to localised flooding and/or near the Thames River. Increase in hard standing areas can contribute to an increase in flood risk.	-	P S - L	I	Land in the major growth corridor is affected by flooding as identified by the Environment Agency flood maps. There is flood risk if the Thames Barrier were to fail. Flood assessments to be carried out as part of the development assessment process and advice followed in accordance with PPS 25. The area of 'hard landscaping' should be minimised and on-site open space provided to ensure infiltration.
10	Landscapes and Townscapes	There will be a physical impact.	0	P S - L	D	The highest design quality standards need to be followed to ensure an enhanced built environment.
11	Historic environment	Generally neutral impact.	0	P S - L	D	Other policies need to emphasise the protection and enhancement of Lewisham's historic environment.
<b>Social</b>						
12	Sufficient & decent housing	The preferred option provides for a specific form of housing need.	++	P S - L	D	Annual monitoring should be carried out to evaluate delivery.
13	Human health	Ensures housing sites are provided with appropriate amenities and facilities therefore contributing to a health lifestyle.	+	P L	I	Plans should ensure that proposals do not have significant health impacts.
14	Reduce poverty & exclusion	The preferred option contributes to mixed and balanced communities.	+	P S	I	Annual monitoring should be carried out to evaluate delivery.
15	Education	There may be a demand for education services.	-/0	T L	I	New development to contribute to the provision of education through appropriate planning obligations.

16	Reduce crime	Sufficient and decent housing may improve quality of life and have a positive beneficial reduction in crime rates.	+	T ?	I	Ensure developments built to 'safer by design' standards.
17	Community welfare	Preferred option seeks to ensure community welfare for site occupants and those surrounding residents.	+	P ?	I	Annual monitoring should be carried out to evaluate delivery.
18	Accessibility	Sites will be accessible to a range of services and facilities.	+	P S - L	I	Ensure sites are integrated with surrounding services and accessible paths provided. Other plans to note location to ensure effective service delivery.
<p><b>Comment:</b> Provision for gypsies and travellers contributes to the provision of decent housing, has a positive impact on social exclusion and contributes to community welfare.</p>						

FOR CONSULTATION

**T1 Location of development**

Major trip generating developments must be located where:

- (a) Opportunities for public transport use, walking and cycling are maximised; or close to where this can be provided as part of the proposal; and
- (b) The need for car use is minimised.

Improvements to the transport system required for the development to proceed will be secured through a condition or planning obligation on a planning permission.

	SA Objective	Effect of policy against SA objective	Significance of effect (--,0,+,++,?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth by ensuring traffic reduction, public transport provision and parking provision.	+	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Policy aims to reduce private vehicle use, promote public transport, walking and cycling, contributing to CO2 emission reductions – improving air quality (reducing NOx and PM10).	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Policy aims to reduce private vehicle use, promote public transport, walking and cycling. Contributes to increasing passenger numbers on public transport.	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
8	Energy and climate change	Strategy aims to reduce private vehicle use, promote public transport, walking and cycling, contributing to reducing greenhouse gas emissions – improving air quality.	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Parking can impact on the townscape/landscape.	+/-	P S – L	D	Development should be integrated with the landscape and townscape.

11	Historic environment	Parking can impact on the historic environment.	+/-	P S – L	D	Development needs to have regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Policy aims to improve accessibility.	+	P L	D	Ensure accessibility is assessed in relevant applications.
<b>Comment:</b> The location of major trip generating development is paramount to achieving sustainability objectives. The promotion and provision of public transport has overwhelming positive impacts. There is a need for appropriate travel and transport assessments, and planning obligations, to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration.						

<b>T2 Development and accessibility</b>						
(a) Major trip generating developments will be required to provide a Transport Assessment to be submitted with a planning application to assess the likely travel movements by all modes and their impact on congestion, safety, and the environment of the surrounding area. The scope of the assessment will reflect the scale of the development proposed and the extent of the transport implications.						
(b) A Transport Assessment would normally be accompanied by a travel plan.						
(c) Mitigation measures identified in the Transport Assessment will be secured through a condition or planning obligation on a planning permission.						
	<b>SA Objective</b>	<b>Effect of policy against SA objective</b>	<b>Significance of effect</b> (--,0,+,++,?)	<b>Timescale</b> (S/M/L/?)	<b>Cause</b> (D/I)	<b>Mitigation/enhancement measures</b>
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Strategy aims to ensure all transport issues are assessed in relevant applications.	+	P S – L	D	Effective policy implementation. Major development needs to be located near public transport and maximise use of walking and

8	Energy and climate change	Generally neutral. No direct impact.				cycling.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Need to ensure transport impacts on the townscape are reduced.	+/-	P S – L	D	Integration with the landscape and townscape.
11	Historic environment	Need to ensure transport impacts on the historic environment are reduced.	+/-	P S – L	D	Have regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Effective transport management can reduce physical segregation of communities.	+	P L	D	Community issues considered in any consultation exercise.
18	Accessibility	Strategy aims to improve accessibility.	+	P L	D	Ensure accessibility in implementation.
<b>Comment:</b> There is a need for appropriate transport assessments, and planning obligations, to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration.						

<b>T3 Travel plans</b>						
(a) Developments that will have a significant transport implication will be required to submit a travel plan in order to reduce the impact of travel and transport on the environment.						
(b) The implementation of a travel plan will be secured through a condition or planning obligation on a planning permission.						
	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				

6	Air quality	Travel Plans aims to reduce private vehicle use, promote public transport, walking and cycling - contributing to CO2 emission reductions – improving air quality (reducing NOx and PM10).	++	P S – L	D	Effective policy implementation. Ensure a full range of transport issues are assessed as part of relevant planning applications. Major trip generating development needs to be located near public transport and maximise use of walking and cycling.
7	Transport	Travel Plans aim to reduce private vehicle use, promote public transport, walking and cycling. Contributes to increasing passenger numbers on public transport.	++	P S – L	D	Effective policy implementation. Ensure a full range of transport issues are assessed as part of relevant planning applications. Major trip generating development needs to be located near public transport and maximise use of walking and cycling.
8	Energy and climate change	Travel Plans aim to reduce private vehicle use, promote public transport, walking and cycling - contributing to reducing greenhouse gas emissions – improving air quality.	++	P S – L	D	Effective policy implementation. Ensure a full range of transport issues are assessed as part of relevant planning applications. Major trip generating development needs to be located near public transport and maximise use of walking and cycling.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Generally neutral. No direct impact.				
11	Historic environment	Generally neutral. No direct impact.				
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Travel Plans promote the use of public transport to improve accessibility.	+	P S – L	D	
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Travel Plans aim to improve accessibility.	+	P L	D	Ensure accessibility accounted for in implementation.

**Comment:**

The promotion of public transport and other transport measures to reduce private car use has overwhelming positive impacts. There is a need for planning obligations, to ensure effective implementation and transport use impacts positively on the Borough's regeneration.

<b>T4 Transport infrastructure</b>						
In appropriate circumstances, planning obligations will be sought for:						
(a) Highway improvements or traffic management measures, which are necessary for a development to proceed; and/or						
(b) Public transport improvements to services or facilities; and/or						
(c) Other measures to improve accessibility by pedestrians and cyclists.						
The cumulative impact of a development will also determine if and when planning obligations are sought.						
	<b>SA Objective</b>	<b>Effect of policy against SA objective</b>	<b>Significance of effect</b> (--, -, 0, +, ++, ?)	<b>Timescale</b> (S/M/L/?)	<b>Cause</b> (D/I)	<b>Mitigation/enhancement measures</b>
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth by through traffic management and improvement, public transport provision and improvements for pedestrians and cyclists.	+	P L	D	Effective policy implementation - planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Highways works can increase traffic while other works aims to reduce private vehicle use, promote public transport, walking and cycling. Potential CO2 emission reductions – improving air quality (reducing NOx and PM10).	?	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Highway improvements are promoted, but this could lead to more vehicle use and trips. Policy also aims to reduce private vehicle use, promote public transport, walking and cycling. Potential to increasing passenger numbers on public transport.	+/-	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
8	Energy and climate change	Highways works can increase traffic while other works aims to reduce private vehicle use, promote public transport, walking and cycling. Potential to contribute to reduction in greenhouse gas emissions – improving air quality.	?	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Need to ensure transport management contributes positively to townscape.	+/-	P S – L	D	Transport projects should be integrated with the landscape and

11	Historic environment	Need to ensure transport management contributes positively to the historic environment.	+/-	P S – L	D	townscape. Transport projects need to have regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Promotes the use of public transport to improve accessibility.	+	P S – L	D	Effective policy implementation.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Crime or its perception can occur on streets and/or at/near transport interchanges/facilities.	+/-	P S – L	D	Traffic management, new transport facilities and any design related to transport infrastructure to be in accordance with Secured by Design standards.
17	Community welfare	Effective traffic and transport management can reduce physical segregation of communities.	+	P L	D	Community issues considered in any transport consultation exercise.
18	Accessibility	Contributes to corporate target of improving accessibility.	+	P L	D	Ensure transport projects account for accessibility in implementation.
<b>Comment:</b> Transport infrastructure especially through the provision of public transport has overwhelming positive impacts. There is a need for planning obligations, to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration including the reduction of private vehicle use, while promoting walking and cycling.						

<b>T5 Street hierarchy</b>						
The Council will manage the use of streets by establishing the street hierarchy as set out in Map # consisting of Strategic Roads, London Distributor Roads, Local Distributor and Local Access Roads.						
	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth through effective traffic management.	+	P L	D	Effective policy implementation can effectively assess and reduce adverse transport impacts. Implementation of the LIP.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and	Generally neutral. No direct impact.				

	Open Space					
6	Air quality	Focus is on the use of streets and roads not on minimising private vehicle use or promoting public transport. Contributes to CO <sub>2</sub> , NO <sub>x</sub> and PM <sub>10</sub> emissions	-	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Focus is on the use of streets and roads not on minimising private vehicle use or promoting public transport.	-	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
8	Energy and climate change	Generally neutral. No direct impact.				
9	Flood risk	Surface water runoff (from streets and roads) can contribute to local flood risk.	-	T S – L	I	Ensure adequate drainage and possible reuse of water runoff for other uses.
10	Landscapes and Townscapes	Need to ensure traffic management contributes positively to townscape.	+/-	P S – L	D	Traffic projects should be integrated with the landscape and townscape.
11	Historic environment	Need to ensure traffic management contributes positively to the historic environment.	+/-	P S – L	D	Traffic projects need to have regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Crime or its perception can occur on streets and roads	+/-	P S – L	D	Traffic management designs to be in accordance with Secured by Design standards.
17	Community welfare	Effective management can reduce physical segregation of communities but alternatively can also lead to segregation.	+/-	P L	D	Community issues considered in any transport consultation exercise.
18	Accessibility	Generally neutral. No direct impact.				

**Comment:**

An effective street and road hierarchy contributes to traffic management. However, there is a risk of focusing on the use of the private vehicle rather than public transport use. Physical and community segregation can also occur where the street hierarchy is rigorously imposed, rather than managing streets as a series of

spaces. The policy needs to be used in conjunction with a range of traffic management measures and relate to the implementation of the LIP.

### T6 New road building and improvements

New road building will be kept at a minimum and new road schemes and improvements to existing roads will be supported where they:

- (a) Are consistent with the needs of public transport operators, cyclists, pedestrians, safety requirements and local planning objectives;
- (b) Primarily serve other purposes such as regeneration; major public transport improvements; and/or wider traffic management programmes; and
- (c) Allow traffic to be reassigned from unsuitable roads in the hierarchy.

The effectiveness of the use of roads should be measured in terms of the number of people moved rather than vehicles. There should be a general presumption in favour of pedestrians, cyclists and buses in the allocation of road space.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Policy supports regeneration which contributes to improved economic growth.	+	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	The building of any new road will impact negatively on CO <sub>2</sub> , NO <sub>x</sub> and PM <sub>10</sub> emissions. However there is a focus on the number of people moved rather than vehicles.	-	P S – L	D	Effective policy implementation. Need to ensure public transport use and improvements integral to new road building, including maximising use of walking and cycling.
7	Transport	The focus is on the number of people moved rather than vehicles and integrating new roads with improved public transport.	+	P S – L	D	Effective policy implementation. Need to ensure public transport use and improvements integral to new road building, including maximising use of walking and cycling.
8	Energy and climate change	There is a focus towards ensuring the provision of public transport, walking and cycling – this can contribute to reducing greenhouse gas emissions. Unknown whether car use will be reduced.	?	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
9	Flood risk	Surface water runoff from roads can	-	T	I	Ensure adequate drainage and

		contribute to local flood risk.		S – L		possible reuse of water runoff for other uses.
10	Landscapes and Townscapes	Need to ensure new roads contribute positively to townscape.	+/-	P S – L	D	Ensure integration with the landscape and townscape.
11	Historic environment	Need to ensure new roads contribute positively to the historic environment.	+/-	P S – L	D	Have regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Opportunities to walk and cycle can improve health.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Promotes the use of public transport to improve accessibility.	+	P S – L	D	
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Crime or its perception can occur on streets and/or at/near transport interchanges/facilities.	+/-	P S – L	D	Traffic management, new transport facilities and any design related to transport infrastructure to be in accordance with Secured by Design standards.
17	Community welfare	Effective traffic management can reduce physical segregation of communities.	+	P L	D	Community issues considered in any transport consultation exercise.
18	Accessibility	Aims to improve accessibility.	+	P L	D	Ensure transport projects account for accessibility in implementation.
<b>Comment:</b>						
There is a need to ensure new roads are built to improve conditions for public transport, pedestrians and cyclists. There is a need for appropriate travel and transport assessments, and planning obligations, to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration.						

**T7 Traffic management**

The Council will introduce traffic calming schemes and measures in appropriate locations so as to:

- (a) Reduce traffic to achieve the role assigned to roads in the hierarchy;
- (b) Allocate road space to essential traffic and environmentally friendly modes of transport;
- (c) Reflect the requirements of land uses along the road, in terms of access, essential movement and environmental needs;
- (d) Improve the environment for residents; and
- (e) Take account of the needs of public transport operators.

A planning obligation may be sought for off-site traffic mitigation measures to address potential adverse traffic impacts arising from a development proposal.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth by ensuring traffic reduction, public transport provision and parking provision.	+	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Policy aims to reduce traffic, promote public transport, walking and cycling, contributing to CO2 emission reductions – improving air quality (reducing NOx and PM10).	+	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Policy aims to manage traffic and reduce private vehicle use, while promoting public transport, walking and cycling.	+	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Ensure integrated approach to traffic management.
8	Energy and climate change	Strategy aims to reduce private vehicle use, promote public transport, walking and cycling, contributing to reducing greenhouse gas emissions – improving air quality.	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Need to ensure traffic management contributes positively to townscape.	+/-	P S – L	D	Traffic projects should be integrated with the landscape and townscape.
11	Historic environment	Need to ensure traffic management	+/-	P	D	Traffic projects need to have regard

		contributes positively to the historic environment.		S – L		to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	The needs of residents are accounted for – can impact positively on access to public transport accessibility.	+	P S – L	D	Effective policy implementation.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Crime or its perception can occur on streets and/or at/near transport interchanges/facilities.	+/-	P S – L	D	Traffic management, new transport facilities and any design related to transport infrastructure to be in accordance with Secured by Design standards.
17	Community welfare	Effective traffic management can reduce physical segregation of communities.	+	P L	D	Community issues considered in any transport consultation exercise.
18	Accessibility	Strategy aims to improve accessibility. Contributes to corporate target of providing disabled access at all pedestrian crossings.	+	P L	D	Ensure transport projects account for accessibility in implementation.
<b>Comment:</b> There is a need to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration. This approach is supported by an effective traffic management strategy to which addresses the needs of business, residents and reduces the impact and use of the private vehicle.						

<b>T8 Freight</b>						
(a) Road freight movements should be restricted and confined to suitable routes in accordance with the road hierarchy in order to protect residential amenity.						
(b) Rail and water borne transport of freight will be encouraged with relevant freight operators where such use does not compromise the amenity of neighbouring uses or adversely affect the water environment and air quality.						
	<b>SA Objective</b>	<b>Effect of policy against SA objective</b>	<b>Significance of effect</b> (--, -, 0, +, ++, ?)	<b>Timescale</b> (S/M/L/?)	<b>Cause</b> (D/I)	<b>Mitigation/enhancement measures</b>
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth through the movement of goods; however, traffic congestion can contribute to economic decline.	+/?	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Positive impact from jobs related to the movement of freight if located in the Borough.	+/?	P L	D	
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Potential impacts on biodiversity through increased air pollution.	-/?	P L	I	
6	Air quality	Potential negative impact. Extent and impact not known. NOx and PM10 particles are a concern. Diesel lorries will add to these impacts. Large part of Borough in an AQMA.	-/?	P S – L	D	Promote and lobby for freight to be moved by modes other than road.
7	Transport	Does not reduce freight movements by vehicle. Contributes to the number of lorries on the Borough's roads.	-	P S – L	D	Promote and lobby for freight to be moved by modes other than road.
8	Energy and climate change	Potential negative impact. Extent and impact not known. NOx and PM10 particles are a concern. Diesel lorries will add to these impacts.	-/?	P S – L	D	Promote and lobby for freight to be moved by modes other than road.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Impact on townscape depending on volume of freight.	?	P S – L	D	Promote and lobby for freight to be moved by modes other than road.
11	Historic environment	Impact on historic environment depending on volume of freight.	?	P S – L	D	Promote and lobby for freight to be moved by modes other than road.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	People living close to and around major roads will be particularly	-	P L	I	Promote and lobby for freight to be moved by modes other than road.

		impacted by air pollution and noise.				
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Road freight will add to noise and visual impacts.	-	P L	D	Promote and lobby for freight to be moved by modes other than road.
18	Accessibility	Generally neutral. No direct impact.				

**Comment:**

The policy seeks to ensure that freight movement within the Borough is restricted to ensure residential amenity. However other modes of freight movement (other than lorry/vehicle) need to be promoted and used to ensure positive impacts.

<b>T9 Home zones</b>						
The Council supports the principle of Home Zones and 20 MPH zones and will investigate the experimental introduction of such and similar traffic management schemes so that optimum solutions can be found.						
	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Effects unknown. Policy aims to reduce vehicle speed. This may lead to reduced private vehicle use contributing to CO2 emission reductions – improving air quality (reducing NOx and PM10).	+/?	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Strategy aims to reduce vehicle speed contributing to an improved residential environment.	+/?	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Development needs to be located near public transport and maximise use of walking and cycling.
8	Energy and climate change	Generally neutral. No direct impact.				
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Need to ensure traffic management contributes positively to townscape.	+/-	P S – L	D	Traffic projects should be integrated with the landscape and townscape.
11	Historic environment	Need to ensure traffic management	+/-	P	D	Traffic projects need to have regard

		contributes positively to the historic environment.		S – L		to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality. Slower traffic will reduce potential for accidents.	+	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Crime or its perception can occur on streets.	+/-	P S – L	D	Traffic management needs to be in accordance with Secured by Design standards.
17	Community welfare	Effective traffic management can reduce physical segregation of communities.	+	P L	D	Community issues considered in any transport consultation exercise.
18	Accessibility	Policy aims to improve accessibility.	+	P L	D	Ensure transport projects account for accessibility in implementation.
<b>Comment:</b>						
There is a need to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration. Slower traffic in residential areas can contribute positively to social objectives, however, there is a need to ensure compatibility with the townscape and heritage environment.						

<b>T10 Car free residential development</b>						
In a Sustainable Living Area (SLA) residential development without parking provision may be acceptable where:						
(a) There is very good public transport accessibility; and						
(b) Developers can demonstrate that the development will have no adverse impact on on-street car parking.						
	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth by ensuring traffic reduction.	+	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Potential positive impacts from reducing area used for parking, contributing to increased open space.	+			Space allocated for car parking should be used for on-site open space.

6	Air quality	Policy aims to reduce private vehicle use, promote public transport, walking and cycling, contributing to CO2 emission reductions – improving air quality (reducing NOx and PM10).	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
7	Transport	Strategy aims to reduce private vehicle use, promote public transport, walking and cycling.	++	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
8	Energy and climate change	Policy aims to reduce private vehicle use, promote public transport, walking and cycling, contributing to reducing greenhouse gas emissions – improving air quality.	+	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications.
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Need to ensure traffic management/development contributes positively to townscape.	+/-	P S – L	D	Need to ensure development integrated with the landscape and townscape.
11	Historic environment	Need to ensure traffic management/development contributes positively to the historic environment.	+/-	P S – L	D	Need to ensure development has regard to relevant conservation policies.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Traffic reduction can contribute to improved health through better air quality and opportunities to walk and cycle.	+	P L	D	Provision should be made for walking and cycling in car free development.
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Generally neutral. No direct impact.				
<b>Comment:</b> The promotion and provision of car free residential development can have positive impacts. There is a need for appropriate travel and transport assessments, and planning obligations, to ensure the policy impacts positively on the Borough's regeneration. Ensuring access to public transport supports this approach.						

**T11 Controlled parking zones**

The Council will review the existing controlled parking zones (CPZs) and will consider introducing new CPZs particularly in and around:

- (a) Town Centres;
- (b) Railway stations; and
- (c) Other high traffic generating land uses.

Proposals, which adversely affect on-street parking may be required to contribute to the introduction of a CPZ and a planning obligation may be sought to secure funding.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Strategy can contribute to supporting economic growth by ensuring traffic reduction.	+	P L	D	Effective policy implementation – requiring Travel Plans, Travel Impact Assessment and/or planning obligations can effectively assess and reduce adverse transport impacts.
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Generally neutral. No direct impact.				
7	Transport	Policy seeks to control traffic around high traffic generating land uses. This can ensure better on-street parking conditions.	+	P S – L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Ensure community consultation.
8	Energy and climate change	Generally neutral. No direct impact.				
9	Flood risk	Generally neutral. No direct impact.				
10	Landscapes and Townscapes	Generally neutral. No direct impact.				
11	Historic environment	Generally neutral. No direct impact.				
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Generally neutral. No direct impact.				
14	Reduce poverty & exclusion	Generally neutral. No direct impact.				
15	Education	Generally neutral. No direct impact.				

16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Policy seeks to improve access around high traffic generating land uses through a turn over of parking.	+	P L	D	Ensure transport projects account for accessibility in implementation.

**Comment:**  
 The implementation of a CPZ seeks to control traffic conditions in certain localities and ensure access to on-street parking. There is a need for appropriate travel and transport assessments, and planning obligations, to ensure traffic is appropriately managed and impacts positively on the Borough's regeneration.

<b>T12 Car parking standards</b>						
The Council will normally require development to make provision for off-street parking in accordance with the standards set out in Table ##. New development shall:						
(a) Provide conveniently located spaces designate for the use by people with disabilities;						
(b) Where appropriate, encourage multiuse parking, including the public use of private commercial car parking spaces; and						
(c) Have regard to the level of public transport accessibility.						
	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Space allocated to parking and car use reduces land potentially allocated/used as open space and associated biodiversity impacts.	-	P S-L	I	Ensure open space is provided on-site through other policies.
6	Air quality	Space allocated to parking and car use contributes to air pollution.	-	P S-L	I	Effective policy implementation. Ensure transport/parking issues are assessed as part of relevant planning applications.
7	Transport	Improved conditions for private vehicle use but not public transport use.	+/-	P S-L	D	Effective policy implementation. Ensure transport issues are assessed as part of relevant planning applications. Public transport, walking and cycling needs to be promoted through other policies.
8	Energy and climate change	Generally neutral. No direct impact.				
9	Flood risk	Surface water runoff (from parking areas) can contribute to local flood risk.	-	T S-L	I	Parking surfaces should be impermeable wherever possible,

						have adequate drainage and possible reuse of water runoff for other uses.
10	Landscapes and Townscapes	Parking can impact on the townscape/landscape.	+/-	P S - L	D	Traffic projects should be integrated with building design and townscape/landscape.
11	Historic environment	Parking can impact on the historic environment.	+/-	P S - L	D	Traffic projects need to have regard to relevant conservation policies, including no parking for certain types of development to reduce impact.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Associated impacts from air pollution as a result of car use.	-	P L	D	Walking and cycling should be considered as part of any assessment process.
14	Reduce poverty & exclusion	Policy accounts for the needs of people with disabilities.	+	P S - L	D	Effective policy implementation.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				
17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Private accessibility is generally increased.	+	P S - L	D	
<b>Comment:</b> Accessibility is increased for car owners and drivers and there is a differential impact on different groups (disabled access). The impacts of greater car use affect those living close to roads and parking areas.						

### T13 Provision for cyclists

The Council will only grant planning permission for development where it makes satisfactory provision for cyclists. In assessing development, traffic management and highway alterations, the Council will seek to:

- (a) Provide a network of well signposted cycle routes throughout the borough;
- (b) Provide suitable and safe cycle routes to schools and on commuter routes which contribute to the London-wide strategic cycle route network;
- (c) Take account of the needs of cyclists in the design of highway improvement schemes;
- (d) Provide secure, attractive, convenient and adequate cycle parking and changing facilities in the borough's town centres, at public transport interchanges and on business, residential and leisure development sites.

The Council will require development to make provision for cycle parking in accordance with the standards set out in Table #.

A planning obligation may be sought for cycling measures arising from a development proposal.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Accessibility through cycling, to and within the borough, can contribute to economic growth as it promotes labour mobility.	+	P S – L	D	Ensure large scale schemes provide for cycling, are accessible and link to other localities.
2	Employment	Accessibility through cycling, to and within the borough, can contribute to economic growth as it promotes labour mobility.	+	P S – L	D	Ensure large scale schemes provide for cycling, are accessible and link to other localities.
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Improvements to the cycling environment, particularly along the Waterlink Way and Thames footpath, can have a positive impact on the foreshore environment.	+	P L	D	Effective policy implementation through conditions or a planning obligation.
5	Biodiversity and Open Space	Cycling corridors can act as green corridors for flora and fauna.	+	P S – L	I	Ensure key corridors are designated as green corridors.
6	Air quality	Cycling reduces the need for private vehicle use, which contributes to improved air quality.	++	P S – L	D	Travel plans can promote cycling; and a transport assessment will show the potential traffic impact of a development.
7	Transport	Cycling reduces car travel and improves accessibility by a sustainable mode of transport. Aim to achieve an increase of at least 80% in cycling in London between 2001 – 2011.	++	P S – L	D	Travel plans can promote cycling; and a transport assessment will show the potential traffic impact of a development.
8	Energy and climate	Cycling reduces car travel and	++	P	D	Travel plans can promote cycling;

	change	improves accessibility by sustainable modes of transport, reducing CO2 emissions.		S – L		and a transport assessment will show the potential traffic impact of a development.
9	Flood risk	Cycling routes may be located in flood risk areas.	-	P S – L	I	Need to assess flood risk.
10	Landscapes and Townscapes	Design of additional and/or improvements to cycling routes will need to be in context.	-/+	P L	D	New routes and/or improvement to existing routes to make a positive contribution to the character of the local area.
11	Historic environment	Design of additional and/or improvements to cycling routes will need to be in context with historic environment.	-/+	P L	D	New routes and/or improvements existing routes to be designed in character with the historic environment.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Cycling is a healthy pursuit and reduces the private vehicle use – reducing CO2 emissions.	+	P L	D/I	Travel plans can promote cycling.
14	Reduce poverty & exclusion	Provision for well connected cycling routes improves accessibility to services and facilities.	+	P L	I	Location criteria will need to be considered when assessing developments to ensure accessibility.
15	Education	Improvements to walking and cycling conditions can improve accessibility.	+	P S-L	I	
16	Reduce crime	Cycling routes can provide areas for anti-social behaviour. Can also reduce crime due to social activity.	-/+	P L	I	New routes to be designed in accordance with Secured by Design standards.
17	Community welfare	Provision for well connected cycling routes improves accessibility - and people's ability to become involved in community activities.	+	P L	I	
18	Accessibility	Ensure all services are well connected and accessible through cycling – increases people's ability to become involved in community activities.	+	P S – L	D	Location criteria will need to be considered when providing new facilities to ensure accessibility.
<p><b>Comment:</b> Improving conditions cycling has positive environmental and social impacts. There is a need to ensure accessibility is promoted and enhanced as part of the development process. The use of travel plans and travel assessments can contribute to sustainable transport patterns.</p>						

<b>T14 Motorcycle parking</b>						
The Council will normally require development to make provision for motorcyclists and allocate parking space in appropriate development.						
	<b>SA Objective</b>	<b>Effect of policy against SA objective</b>	<b>Significance of effect</b> (--, -, 0, +, ++, ?)	<b>Timescale</b> (S/M/L/?)	<b>Cause</b> (D/I)	<b>Mitigation/enhancement measures</b>
<b>Economic</b>						
1	Economic Growth	Generally neutral. No direct impact.				
2	Employment	Generally neutral. No direct impact.				
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Less air pollution from motorcycles than other modes of private transport.	+	P S – L	D	Effective policy implementation. Ensure parking provision in larger schemes.
7	Transport	Improved conditions for motorcycle use. Less impact than other modes of private transport.	+	P S – L	D	Effective policy implementation. Ensure parking provision in larger schemes.
8	Energy and climate change	Generally neutral. No direct impact.				
9	Flood risk	Surface water runoff (from parking areas) can contribute to local flood risk.	-	T S – L	I	Parking surfaces should be impermeable wherever possible, have adequate drainage and possible reuse of water runoff for other uses.
10	Landscapes and Townscapes	Parking can impact on the townscape/landscape.	+/-	P S – L	D	Traffic projects should be integrated with building design and townscape/landscape.
11	Historic environment	Parking can impact on the historic environment.	+/-	P S – L	D	Traffic projects need to have regard to relevant conservation policies, including no parking for certain types of development to reduce impact.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Associated impacts from air pollution as a result of motorcycle use.	?/-	P L	D	
14	Reduce poverty & exclusion	Policy accounts for the needs of people with disabilities.	+	P S – L	D	Effective policy implementation.
15	Education	Generally neutral. No direct impact.				
16	Reduce crime	Generally neutral. No direct impact.				

17	Community welfare	Generally neutral. No direct impact.				
18	Accessibility	Private accessibility is generally increased.	+	P S - L	D	

**Comment:**

Accessibility is increased for motorcycle users. Impacts are generally thought to be less than other modes of private transport.

**T15 Pedestrian routes and access**

The Council will seek to ensure that:

- (a) New developments; and
- (b) Traffic management, highways alteration and parking schemes, provide safe and convenient routes and access for pedestrians which, provide links to public transport.

A planning obligation may be sought for pedestrian measures arising from a development proposal.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Pedestrian accessibility, to and within the borough, can contribute to economic growth as it promotes labour mobility.	+	P S - L	D	Ensure large scale schemes to ensure pedestrian accessibility and links to other localities.
2	Employment	Pedestrian accessibility, to and within the borough, can contribute to economic growth as it promotes labour mobility.	+	P S - L	D	Ensure pedestrian accessibility, and links to other localities.
<b>Environmental</b>						
3	Minimise waste	Walking reduces the need for private vehicle use.	+	P L	D	
4	Water resources	Improvements to the pedestrian environment, particularly along the Waterlink Way and Thames footpath, can have a positive impact on the foreshore environment.	+	P L	D	
5	Biodiversity and Open Space	Pedestrian corridors can act as green corridors for flora and fauna.	+	P S - L	I	Ensure key corridors are designated as green corridors.
6	Air quality	Walking reduces the need for private vehicle use, which contributes to improved air quality.	++	P S - L	D	Travel plans can promote walking; and a travel assessment will show the potential impact of a development.
7	Transport	Walking reduces car travel and improves accessibility by sustainable modes of transport.	++	P S - L	D	Travel plans can promote walking; and a travel assessment will show the potential impact of a development.
8	Energy and climate change	Walking reduces car travel and improves accessibility by sustainable modes of transport, reducing CO2 emissions.	++	P S - L	D	Travel plans can promote walking; and a travel assessment will show the potential impact of a

9	Flood risk	Pedestrian routes may be located in flood risk areas.	-	P S – L	I	development. Need to assess flood risk.
10	Landscapes and Townscapes	Design of additional and/or improvements to walking routes will need to be in context.	-/+	P L	D	New routes and/or improvement to existing routes to make a positive contribution to the character of the local area.
11	Historic environment	Design of additional and/or improvements to walking routes will need to be in context with historic environment.	-/+	P L	D	New routes and/or improvements existing routes to be designed in character with the historic environment.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Walking and cycling are healthy pursuits and reduces the use of private vehicles – reducing CO2 emissions.	+	P L	D/I	Travel plans can promote walking and cycling.
14	Reduce poverty & exclusion	Provision for well connected walking and cycling routes improves accessibility to services and facilities.	+	P L	I	Location criteria will need to be considered when assessing developments to ensure accessibility.
15	Education	Improvements to walking and cycling conditions can improve accessibility.	+	P S-L	I	
16	Reduce crime	Walking routes can provide areas for anti-social behaviour. Can also reduce crime due to social activity.	-/+	P L	I	New routes to be designed in accordance with Secured by Design standards
17	Community welfare	Provision for well connected pedestrian routes improves accessibility - and people's ability to become involved in community activities.	+	P L	I	
18	Accessibility	Pedestrian accessibility is improved.	+	P S – L	D	Ensure pedestrian accessibility considered in any relevant assessment.
<b>Comment:</b> Improving pedestrian conditions has positive environmental and social impacts. There is a need to ensure pedestrian accessibility is promoted and enhanced as part of the development process. The use of travel plans and travel assessments can contribute to sustainable transport patterns.						

**T16 Transport interchanges**

- (a) Better interchange within public transport, and between public transport and private transport, will be sought as opportunities arise. Where appropriate developments should improve such facilities and provide for cycle access.
- (b) A comprehensive programme of interchange improvements will be pursued with relevant agencies and transport providers.
- (c) The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

	SA Objective	Effect of policy against SA objective	Significance of effect (--, -, 0, +, ++, ?)	Timescale (S/M/L/?)	Cause (D/I)	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Better accessibility to and within the borough can contribute to economic growth as it promotes labour mobility.	+	P S – L	D	
2	Employment	Better accessibility to and within the borough can contribute to employment growth and opportunities as it promotes labour mobility.	+	P S – L	D	
<b>Environmental</b>						
3	Minimise waste	Generally neutral. No direct impact.				
4	Water resources	Generally neutral. No direct impact.				
5	Biodiversity and Open Space	Generally neutral. No direct impact.				
6	Air quality	Better public transport services reduces the need for private vehicle use, which contributes to improved air quality – reducing NOx and PM10.	++	P S – L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
7	Transport	Better public transport facilities (including better connections) makes public transport use more appealing – reducing car travel and improving accessibility by sustainable modes of transport.	++	P S – L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
8	Energy and climate change	Better public transport reduces car travel and improves accessibility by sustainable modes of transport, reducing CO2 emissions.	++	P S – L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
9	Flood risk	Public transport infrastructure may be located in flood risk areas.	-	P S – L	I	Construction of new public transport corridors needs to assess flood risk.
10	Landscapes and Townscapes	Design of additional and/or improvements to existing facilities will need to be in context of the locality.	-/+	P S – L	D	New facilities and/or refurbishment to existing facilities to make a positive contribution to the character of the local area.
11	Historic environment	Design of additional and/or	-/+	P	D	New facilities and/or refurbishment

		improvements to existing facilities will need to be in context with historic environment.		S – L		to existing facilities to be designed in character with the historic environment.
<b>Social</b>						
12	Sufficient & decent housing	Generally neutral. No direct impact.				
13	Human health	Better public transport can reduce the use of private vehicles – reducing CO2 emissions.	+	P L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
14	Reduce poverty & exclusion	Better public transport improves accessibility to services and facilities.	+	P L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
15	Education	Improved accessibility, contributes to accessible education.	+	P L	D	
16	Reduce crime	New public transport facilities such as interchanges, railway stations, and bus stops, can be areas for anti-social behaviour.	-	P L	D	New facilities associated with public transport to be designed in accordance with Secured by Design standards.
17	Community welfare	Better public transport can improve accessibility and people's ability to become involved in community activities.	+	P L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
18	Accessibility	Better public transport will improve accessibility.	++	P S – L	D	Effective policy implementation through planning obligations and work with transport agencies and providers.
<b>Comment:</b> Supporting public transport interchanges can make a positive contribution to sustainability objectives. This is achieved through improving accessibility and connectivity within the borough; improving transport choices to reduce the use of the private car; and contributing to improved air quality.						

### RTC1 Principles for Retail development and other Town Centre Use (Excludes Lewisham and Catford Town Centre)

Proposals for retail development and other key town centre uses will be determined on:

1. An assessment of need for the development in the format proposed.
2. Identification of the appropriate scale of the development in relation to the retail hierarchy set out in CP 30.
3. Application of the sequential test to site selection.
4. Assessment of the impact of the development on existing centres in Lewisham, the East London sub region and neighbouring centres, including the cumulative impact of recent and committed development sites in the locality. This applies to proposals which would have a gross floorspace in excess of 2500 square metres.
5. The effect on amenities of adjoining property and/or residential occupiers.

Edge of centre retail, leisure, office, employment and community schemes will need to demonstrate that they can effectively integrate with existing frontages.

No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy seeks to ensure that the borough remains competitive whilst growing at a rate in relation to its retail hierarchy.	++	P (S – L)	D	Reinforcement and consolidation of retail town centres where necessary should improve the concentration of activity and enhance the economic growth.
2	Employment	This policy encourages new development which will provide much needed jobs to cater for the residents.	++	P (S – L)	D	No enhancement measures needed.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	-	P (S – L)	D	Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that little or no effect on this indicator will occur. Although there are policies in place which prevent development on land sensitive to biodiversity.	-	P (L)	D	The plan has a policy on Biodiversity which seeks to prevent development on biodiversity land where feasible.
6	Air quality	The policy seeks to direct activity around the town centre to avoid the use of private	+	P (S – L)	D	No enhancement measures needed.

		transport.				
7	Transport	The aspiration for increased productivity within the borough's retail centres will help to reduce the need for private vehicles as services will be located within greater proximity to residents.	++	P (S – L)	D	No enhancement measures needed.
8	Energy use and Climate Change	With every development there will be some sort of energy use which will potentially have a damaging effect on climate change.	-	P (L)	D	There are policies within the plan which tackle the effects of climate change and would be applied commensurate with this policy.
9	Flood risk	New development over permeable surfaces will exacerbate the problem of flooding. Therefore this policy directs development in areas which have been previously developed before.	+-	T (M –L)	D	Sustainable drainage techniques such as Living Roofs will be encouraged within the plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing itself for future trade.	++	P (S – L)	D	No enhancement measures needed
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	This policy takes into account that development can potentially have a harming effect on residential amenities. As such a caveat has been included to ensure nearby residents have their amenity intact.	++	P (S –L)	D	No enhancement measures needed.
13	Human health	The policy could increase the level of health problems in and around the retail centres as more localised traffic would be predominant and more intensive	--	P (L)	I	The use of car free zones in areas of good public transport could be applied.
14	Reduce poverty & exclusion	This policy seeks to encourage growth which could indirectly reduce poverty.	+	P (M)	D	No enhancement measures suggested.
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	More people within the town centre will aid natural surveillance, which should reduce the number of crimes committed.	+	P (S –L)	D	No enhancement measures suggested.
17	Community welfare	Some centres act as a focal point for people to meet. This policy focuses on the role and function of retail town centres.	++	P (S – L)	D	No enhancement measures suggested.
18	Accessibility	This policy seeks to reinforce the accessibility to retail centres, as such this	++	P (S –L)	D	No enhancement measures suggested.

objective is well met.

**Comment: the role of this policy seeks to ensure that appropriate development is located within the borough in order to direct growth where people don't have to use private transport to access services. There are no known constraints on employment, air quality, transport, landscapes, historic environment, housing, poverty, crime, community welfare and accessibility from meeting the indicators well. As such this policy is considered to be sustainable in its approach.**

### RTC2 Types of uses in Core, Non- Core and Other shopping Areas (Excludes Lewisham and Catford Town Centre)

The following uses are considered acceptable in principle at ground floor level:

Core: Class A1 shops,  
A2 Banks and Building Societies,  
A3 Restaurants  
A4 Public Houses (Pubs) and Bars

In Non- Core Shopping Areas, in addition to the uses defined for Core, the following uses are also considered acceptable in principle at ground floor level:

Non Core: Class A5 Hot food Takeaway (Maximum of ???%)  
Community Services, including GP surgeries, Veterinary Surgeries, Dentists and other similar uses.  
Launderettes and Amusement centres

Other: Notwithstanding the uses acceptable in Core and Non Core shopping Areas, applications for development or change of use which involves the loss of A1 units will normally be acceptable provided:

1. It does not harm the amenity of adjoining properties
2. It does not harm the local distinctiveness, vitality and viability of the centre as a whole.
3. That in the case of a change of use to residential use that the frontage for shoppers is not unreasonably interrupted.

Changes of use from Class A1 (Retail) will be acceptable within designated shopping areas where A1 usage is greater than 70% in the Core and 50% in Non- Core and does not separate retail units by more than 12metres or 3 A1 uses together (whichever is the greater), unless an applicant can demonstrate that the proposal would enhance the character, vitality and viability of the centre and would not adversely affect the retail function as set out in CP 30 of the Core Strategy.

Proposals for the change of use into A3 or A4 will be assessed in conjunction with RTC 5.

The proposal should improve the shopping range, quality and function of the Shopping Area and the retail centre as a whole.

Proposals amounting to more than 1000 square metres gross floorspace within the town centre boundaries must be accompanied by a Green Travel Plan.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy seeks to ensure that the borough remains competitive whilst growing at a rate in relation to ensure that common necessities can still be purchased	++	P (S -L)	D	No enhancement measures are needed so long as the implementation is robust.

		locally.				
2	Employment	This policy encourages new proposals and opportunities which will provide much needed jobs to cater for the residents.	++	P (S – L)	D	No enhancement measures are needed so long as the implementation is robust.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	--	P (S – L)	D	Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed. A3 uses are likely to require more water resources than A2.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	This policy requires that a Travel plan is submitted if the development would be over 1000m <sup>2</sup> which will go towards reducing the amount of emissions released into the air.	++	P (M – L)	D	No enhancement measures suggested.
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be minimal due to heavily enforced roads in Town centres. This policy requires that a Travel plan is submitted if the development would be over 1000m <sup>2</sup> .	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public transport.
8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing	++	P (S – L)	D	No enhancement measures needed

		itself for future trade.				
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	It will be important that retail uses do not impact on the residential amenities of nearby occupiers so that dual use can effectively coexist.	+-	P (M – L)	I	No enhancement measures suggested as policy seeks to take account of neighbouring properties.
13	Human health	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
17	Community welfare	By enabling the core areas to have a predominant level of A1 use, this will encourage more people to shop locally which will encourage community interaction.	++	P (S – L)	D	No enhancement measures needed.
18	Accessibility	As an indirect consequence of this policy access into the town centre will cater for a large catchment enabling easy reach of services and goods.	+	P (S – L)	I	No enhancement measures needed as proposals as any proposals for a change of use which would require altering its appearance or structure would require a design and access statement.
<p><b>Comment: this policy shows positive effects through economic growth, employment, air quality, transport, energy use, climate change, landscapes and townscapes, historic environment, sufficient and decent housing, community welfare and accessibility. This policy promotes retail growth through the enhancement of the existing centres in order to create sustainable communities. The negative effects are mainly found within the environmental section as the implementation of this policy will inevitably lead to problems of waste, water resources and potential flood risk.</b></p>						

### RTC3 Local Shopping Centres and Parades

The Council will maintain and enhance the Local Shopping Centres and Parades existing strengths in providing convenience goods and services for a balanced, sustainable and liveable community. New development will need to ensure good design and accessibility.

The Council will grant planning permission involving the change of use from Class A1 in a Local Shopping Centre, Parade or as a corner shop, provided the new use would contribute towards preserving or enhancing the local character, vitality and viability of the area.

In the case of a change of use the following factors will be taken into consideration:

- (a) the availability of alternative shopping facilities within a comfortable walking distance (approximately 400 metres)
- (b) the number and type of units within the parade, the vacancy rate and the length of time a unit has been vacant
- (c) any harm to the amenity of adjoining properties
- (d) the proposed use maintains an active street frontage to contribute to the vitality and viability of the parade and
- (e) the design of the proposal is in keeping with the surrounding street frontage and makes a positive contribution to the streetscape.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy seeks to ensure that the borough remains competitive whilst growing at a rate in relation to ensure that common necessities can still be purchased locally.	++	P (S – L)	D	No enhancement measures are needed so long as the implementation is robust.
2	Employment	This policy encourages new proposals and opportunities which will provide much needed jobs to cater for the residents.	++	P (S – L)	D	No enhancement measures are needed so long as the implementation is robust.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	-			Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be minimal due to heavily enforced roads in Town centres.	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public transport.
8	Energy use and	Part L of the building regulations identifies	+	P (S – L)	D	This is covered in policy SE2 'Energy

	Climate Change	the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.				efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing itself for future trade.	++	P (S – L)	D	No enhancement measures needed
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	The implementation of this policy should not impact on the residential amenities of adjoining neighbours as this policy serves very small clusters of shops which directly serve the residents.	+	P (S – L)	I	No enhancement measures suggested.
13	Human health	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	Greater presence on the streets will act as deterrent for criminal activities.	+	P (S – L)	I	Crime comes in different forms but having greater numbers of people in the streets would lessen the risk of street crime and burglary.
17	Community welfare	By enabling the core areas to have a predominant level of A1 use, this will encourage more people to shop locally which will encourage community interaction.	++	P (S – L)	D	No enhancement measures needed.
18	Accessibility	As an indirect consequence of this policy	+	P (S – L)	I	No enhancement measures needed

		access into the town centre will cater for a large catchment enabling easy reach of services and goods.				as proposals as any proposals for a change of use which would require altering its appearance or structure would require a design and access statement.
<p><b>Comment : this policy shows positive effects through economic growth, employment, transport, energy use, climate change, landscapes and townscapes, historic environment, sufficient and decent housing, reduce crime, community welfare and accessibility. The negative aspects of this policy remain in the environment section and for future implementation of these policies. Consideration into the residual effects having regard to waste, water resources and waste will need to be fully considered to ensure that the sustainability agenda is kept at the top of the strategy..</b></p>						

<b>RTC4 Out-of-centre proposals</b>						
<p>The Council will grant planning permission for additional retail use, and in particular substantial additional retail development, in the major and district town centres as defined on the Proposals Map. If no suitable, viable or available sites are present in these locations then edge of centre sites should be considered, followed only then by out of centre sites in locations that are or can be made accessible by a choice of means of transport.</p> <p>Proposals for substantial retail provision on the edge or outside of these Centres will only be considered if the following criteria are satisfied:</p> <p>(a) there is a quantitative and qualitative need for the proposal</p> <p>(b) there are no other sites available in accordance with the sequential test</p> <p>(c) the proposal, either by itself or together with other recent or committed developments would not demonstrably harm the vitality and viability of an existing shopping centre</p> <p>(d) the proposal is sited so as to reduce the number and length of car journeys and can serve not only car journeys but also those on foot, bicycle or using public transport</p> <p>(e) the proposal is not on land allocated for employment purposes on the Proposals Map and for which a demand can be established and</p> <p>(f) if planning permissions were to be granted then a s106 may be negotiated for relevant improvements.</p> <p>Developments of 1000m2 gross floor space or more will normally be considered substantial.</p> <p>Proposals amounting to 1000m2 gross floor space or more will require a Green Travel Plan.</p>						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Out of centre development can add to the borough's growth as generally out of centre stores sell on average higher value goods than in the traditional town centre	++	P (S – L)	D	No mitigation enhancements needed.
2	Employment	Due to large scale formats, out of centre development can employ large numbers of staff.	++	P (S – L)	D	No mitigation enhancements needed
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	--	P (S – L)	D	Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use	-	P (S – L)	D	Policies within the plan require commercial development to use

		proposed.				water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	Locations for out of centre development could impact on established protected habitats.	--	P (S – L)	D	Proposals for out of centre development can make good compensatory tools to ensure that biodiversity is unharmed.
6	Air quality	Any large developments would need to include a green travel plan to show how they intend to implement greener methods of travelling to and from work. As such this policy meets this indicator well.	+	P (S – L)	D	No mitigation enhancements needed
7	Transport	People will be tempted into driving to out of centre proposal which will have a damaging effect on the overall strategy.				
8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	Out of centre development if not planned properly can be eyesores to the general public.	-	P (S – L)	D	No enhancement measures needed as a design and access statement would need to accompany any application.
11	Historic environment	Any suitable sites would need to be assessed with regard to any geological or archaeological priority area.	+-	P (S)	I	Policy ?? seeks to conserve and protect the historic environment, and as such won't be
<b>Social</b>						
12	Sufficient & decent housing	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
13	Human health	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	Large format developments are usually associated with out of town centre	++	P (S – L)	D	No enhancement measures suggested.

		developments. As such the likelihood of employment increases as many staff are required to ensure its operations are not jeopardised.				
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	Large format developments can often be better managed and sophisticated surveillance equipment used in order to reduce crime taking place. Many of these centres have their own security team which looks after the site and surroundings.	++	P (S – L)	D	No enhancement measures suggested.
17	Community welfare	Usually large chain companies tend to occupy these large format stores which can be argued to detrimentally impact on the longevity of community life. A large proportion of the workforce along a typical high street live close by to their shops and play an important part in community life. On the other hand these large centres provide many jobs and much needed extra income into the locum.	-	P (S – L)	D	There is a general presumption against out of town centre retail development, however, there maybe instances where this policy will be an important consideration. As such no enhancement measures are proposed.
18	Accessibility	Large format stores lend themselves well to mobility impaired people as surfaces are usually smooth and are on one level. They can be well lit and have personnel to accompany those who find it difficult to move around.	++	P (S – L)	D	No enhancement measures proposed.
<p><b>Comment: This policy has many positives such as economic growth, employment, reduce poverty and exclusion, reduce crime and accessibility which would go towards creating a stronger economy and improving some social aspects. The negative pressures of this policy will be the fact that the policy does very little to minimise waste on a borough level and could have a detrimental impact on biodiversity and climate change. However, the policy as worded gives scope for any suitable application to be determined on.</b></p>						

#### RTC5 Cultural Quarters

Class A3 (Restaurants), Class A4 (Pubs and Bars) and other appropriate assembly and leisure uses (Class D2) will be deemed acceptable in the following Core, Non Core and Other Shopping Areas where they will not be subject to separation or percentage constraints in order to encourage the formation of cultural quarters. These areas include:

1. TO BE DISCUSSED, Deptford
2. TO BE DISCUSSED, Deptford

Proposals will be looked at favourably as long as the preferred use does not harm the residential amenity of neighbours and that every precaution is taken in order to avoid disturbance by noise, obtrusive fumes and smells, traffic generation and litter.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Zones of activity have proven to be a good catalyst for regeneration and will encourage a good economy for the chosen area.	++	P (S – L)	D	No enhancement measures suggested.
2	Employment	New uses will aid good employment opportunities for all.	++	P (S – L)	D	No employment measures suggested.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	--	P(M – L)	D	Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be minimal due to heavily enforced roads in Town centres.	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public transport.
8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and	++	P (S – L)	D	No enhancement measures needed

		to give it a competitive edge in marketing itself for future trade.				
11	Historic environment	There may be issues with these sorts of quarters changing the historic town centre footprint and should be carefully planned in order to preserve this tradition.	-	P (S – L)	D	Policy should indicate new areas rather than impinge on the existing town centre.
<b>Social</b>						
12	Sufficient & decent housing	The implementation of this policy should not impact on the residential amenities of adjoining neighbours as this policy serves very small clusters of shops which directly serve the residents.	+	P (S – L)	I	No enhancement measures suggested.
13	Human health	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	The creation of jobs will have a positive effect on the vitality of town centres.	+	P (S – L)	I	No enhancement measures suggested.
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	By promoting more buoyant quarters, there will be more natural surveillance in the town centre.	+/-	T (S)	I	No enhancement measures suggested.
17	Community welfare	Creating cultural areas can encourage a greater sense of ownership among the local community and become a highly usable space.	+	P (S – L)	D	No enhancement measures suggested.
18	Accessibility	With the preferred site being located within the town centre, this site should cater to a large catchment within easy access of the area.	+	P (S – L)	D	It should be noted that access into individual retail units would be assessed on a site by site basis and would have a design and access statement together with the planning application.
<p><b>Comment: the implementation of cultural quarters can do much for revitalising an area an generating a more economically viable scheme. Benefits will go towards more locally employed people, improved townscape and community welfare. Flood risk and minimising waste are still very important issues which are addressed through other policies in the plan, therefore the policy is considered sufficiently sustainable in its approach.</b></p>						

### RTC6 Evening and Night Time Economy

Within the District centres but outside the Core shopping areas, proposals for recreational and leisure facilities including facilities for arts culture and entertainment pubs, bars, nightclub, bingo halls and any other evening associated use will be acceptable in principle in non core and other shopping areas subject to the following considerations

1. Proximity to Residential areas, Schools, Places of Worship and similar sensitive users.
2. The appropriateness of the scale of the development for the location.
3. The cumulative impact and level of disturbance
4. The nature of the activity, including the impact of the proposed hours of operation
5. The appropriate provision of ventilation and external ducting.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The evening economy in Lewisham has largely suffered due to competition from other neighbouring centres. This policy seeks to encourage a buoyant evening and night time economy whilst having regard to amenities of other properties.	++	P (S – L)	D	Sufficient mitigational effects have been taken into account.
2	Employment	The effect of this policy will provide employment opportunities to the locum	++	P (S – L)	D	No enhancement measures suggested.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	-			Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be minimal due to heavily enforced roads in Town centres.	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public transport.
8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions

		consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.				and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing itself for future trade.	++	P (S – L)	D	No enhancement measures needed
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	The policy will need to ensure that it doesn't have a detrimental impact on residential properties and that there amenities will not be jeopardised.	-	P (S – L)	D	Policy already includes criteria preventing unnecessary impact on residential properties.
13	Human health	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	To some extent this policy will provide employment and reduce the chances of people falling into poverty, although it is not considered that this policy would be directly associated with it.	+-	P (S)	I	This policy is not considered to be of a sufficient impact to warrant any enhancement measures.
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	Studies have shown that the evening and night time economy can increase crime related issues and as such there will need to be other external factors outside of planning needed to deal with these issues.	--	P (S)	D	This policy would need to instil a variety of techniques and seek cooperation from other bodies to work towards reducing crime committed as a consequence of the evening and night time economy.
17	Community welfare	The effect of this policy on community welfare can be both positive and negative as local owners will benefit from a buoyant evening economy but it can also become detrimental to local residents as noise,	--	P(S – M)	D	This policy would need to instil a variety of techniques and seek cooperation from other bodies to work towards reducing crime committed as a consequence of the

		disturbance and criminal activity can lead to distressed residents and a lack of community cohesion.				evening and night time economy.
18	Accessibility	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
<p><b>Comment: this policy proposes very good economic benefits and some environmental benefits. It reinforces the role and function of the town centre and will create a variety of jobs for the workforce. The negative effects this policy could foresee is an increase in crime related activity which could be exacerbated by a proliferation of pubs, bars and restaurants. This policy will need to be applied with a variety of other techniques to ensure the negative effects of the policy can be dealt with in order to protect the amenities of the local community.</b></p>						

<b>RTC7 Mixed Use Development</b>						
The Council will favourably consider new development in the town centre to provide a mix of uses, including independent residential accommodation with separate access. Exceptions may be considered where it can be demonstrated that the site is not suitable to accommodate a mix of uses.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Mixed uses offer a good range of uses and often are serviced through the use of one to another.	++	P (S – L)	D	Complimentary activity has proven to work well and as such no enhancement measures are proposed.
2	Employment	Mixed use development will offer a range of jobs.	++	P (S – L)	D	No enhancement measures suggested.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	--			Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be minimal due to heavily enforced roads in Town centres.	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public transport.

8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> or ten units or more to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing itself for future trade.	++	P (S – L)	D	No enhancement measures needed
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	Predominantly large mixed use developments comprise a large proportion of housing which can include affordable housing.	++	P (S – L)	D	No enhancement measures needed.
13	Human health	Mixed use development can include doctor's surgeries and dentists which can contribute to seeing a doctor promptly.	+	P (S – L)	D	Policy could include wording to promote the need for Doctors Surgeries and Dentists within Mixed use development.
14	Reduce poverty & exclusion	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
16	Reduce crime	Natural surveillance from development can be a useful deterrent in order to reduce crime and the fear of crime.	+	P (S - L)	D	No enhancement measures proposed.
17	Community welfare	Mixed use development can often develop into a community place	+	P (S – L)	D	The encouragement of community facilities within mixed use development can enhance this policy.
18	Accessibility	Mixed use development can improve	+	P (S – L)	D	The encouragement of creating

		access within the development and create improved access to its residents				accessible spaces between uses would strengthen this policy.
<p><b>Comment: this policy proves to be highly sustainable in its approach, waste, water resources and flood risk are the predominant negative factors which prevent this policy from being truly sustainable. The policy could be further improved by promoting doctors surgeries, dentists, community facilities and creating accessible spaces between uses would enhance this policy.</b></p>						

<b>RTC8 Sui Generis Use</b>						
Sui Generis uses and other uses not mentioned in policies RTC 1- 7 will be acceptable in principle in non core and other shopping areas subject to the following considerations						
<ul style="list-style-type: none"> <li>Proximity to and impact on Residential areas, Schools, Places of Worship and similar sensitive users.</li> <li>The appropriateness of the scale of the development for the location.</li> <li>The cumulative impact and level of disturbance</li> <li>The nature of the activity, including the impact of the proposed hours of operation</li> <li>The appropriate provision of ventilation and external ducting.</li> </ul>						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy can help to steer the borough's economic growth by granting appropriate Sui Generis uses in areas where it can fit in with the location.	++	P (S – L)	D	No enhancement measures proposed.
2	Employment	Sui Generis uses usually provide a number of jobs for the local people and as such rates highly positive.	++	P (S – L)	D	No enhancement measures proposed.
<b>Environmental</b>						
3	Minimise waste	The retail sector will generate a lot of waste and policies within this DPD set out the framework for minimising this waste.	--	P (S – L)	D	Planning obligations could be asked in relation to recycling the waste that is used from the site.
4	Water resources	Water usage will increase, although this will generally depend on the type of use proposed.	-	P (S – L)	D	Policies within the plan require commercial development to use water saving devices and sustainable urban drainage techniques where the development will allow.
5	Biodiversity	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
6	Air quality	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
7	Transport	The likely impact will be the transportation of stock to and from shops which would be minimal. Private vehicles would also be	+	P (S – L)	D	The implementation of car free zones within the town centre would strengthen the use of public

		minimal due to heavily enforced roads in Town centres.				transport.
8	Energy use and Climate Change	Part L of the building regulations identifies the legal minimum a development needs to meet in terms of energy efficiency targets, however large retail developments consume large quantities of electricity. The policy for the LDF will require developments of over 1000m <sup>2</sup> to incorporate on site renewable energy equipment to reduce predicted CO <sub>2</sub> emissions by at least 20%.	+	P (S – L)	D	This is covered in policy SE2 'Energy efficiency and renewables for major developments' which seeks to implement a reduction in emissions and improvements in energy efficiency.
9	Flood risk	To the north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	--	P (S – L)	D	The incorporation of SUD's and other preventative measures are addressed within other policies in this plan.
10	Landscapes and Townscapes	This policy seeks to retain the vitality and viability of the borough's town centres and to give it a competitive edge in marketing itself for future trade.	++	P (S – L)	D	No enhancement measures needed
11	Historic environment	This policy seeks to reinforce and retain the legacy of our town centres to prevent out of town centres from taking over the role of a town centre.	++	P (S – L)	D	No enhancement measures needed.
<b>Social</b>						
12	Sufficient & decent housing	Particular attention would need to be given with the application of this policy to ensure no detrimental impact on residential properties.	+-	P (S – L)	D	Policy will need to be used with regard to the proposed activity and its potential effects on residential amenity. No enhancements proposed.
13	Human health	Depending on the proposed activity, the policy may have some negative effects on human health and should be worded as to avoid any negative impact.	-	P (S – L)	D	Activities which involve contaminated material will need to include appropriate disposal methods and the policy should include criteria involving any hazardous materials or create a risk to human health.
14	Reduce poverty & exclusion	To some extent this policy will provide employment and reduce the chances of people falling into poverty, although it is not considered that this policy would be directly associated with it.	+	P (S – L)	D	No enhancement measures proposed.
15	Education	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A

16	Reduce crime	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
17	Community welfare	It is considered that no or little effect will occur on this indicator.	0	N/A	N/A	N/A
18	Accessibility	Sui Generis uses can improve the Public Realm through development of the activity.	++	P (S – L)	I	No enhancement measures proposed.
<p><b>Comment: the effect of this policy is general sustainable with negative factors in minimising waste, water resources, flood risk and human health. The policy enables a valued judgement as to whether an activity is suitable for a particular area. The policy does not indicate any impact on biodiversity, air quality, education, reduce crime and community welfare.</b></p>						

FOR CONSULTATION

### OS1 Metropolitan Open Land and land adjacent to Metropolitan Open Land

The open character of Metropolitan Open Land (MOL) in Lewisham, as shown on the proposals map, will be preserved. Any development proposal on land fringing, abutting or otherwise having a visual relationship with MOL will be assessed on the basis of their impact on visual amenity, character or use of the MOL. Planning permission will be granted only for appropriate development or change of use where this preserves the open nature of the land.

The following uses of land may be appropriate within MOL in Lewisham:

- (a) Private and public open space, playing fields and golf courses;
- (b) Agriculture, woodlands, (including the creation of new native woodland), and orchards;
- (c) Rivers canals, reservoirs, lakes and other open water;
- (d) Allotments and nursery gardens;
- (e) Cemeteries and associated crematorium; and
- (f) Nature conservation.

The Council will be supportive of proposals that enhance these uses and will only permit the limited extension of buildings within MOL where this would not result in a disproportionate addition over and above the size of the original building. Improved public access to appropriate land uses in MOL will be acceptable where it does not conflict with other sustainability objectives as set out in CP 21 of the Core Strategy.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	New Open space provides a scenic and quiet place and the implementation of this policy will enhance this role. Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and	++	P (S – L)	D	No enhancement measures suggested

		provision of open space.				
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	Open space is important to providing sufficient and decent housing. This policy seeks to encourage further open space as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S – L)	D	No enhancement measures suggested.
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	The use of open space is a widely	++	P (S – L)	D	No enhancement measures

		recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.				suggested.
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design can reduce the fear of crime.	++	P (S - L)	I	No enhancement measures suggested.
<p><b>Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.</b></p>						

## OS2 Public Open Space and Urban Green Space (Open Environment)

The Council will resist inappropriate development on the areas of Public Open Space (POS) or Urban Green Space (UGS), as set out in Table ## and shown on the Proposals Map. Inappropriate development includes:

- (a) development that would result in the loss of or damage to POS or UGS; and or
- (b) development that adversely affects the amenity, open character or appearance of the POS or UGS through inappropriate scale.

Development that would result in the loss of or damage to sites that have not been designated as either POS or UGS but are nonetheless valuable locally will also be resisted as inappropriate.

As an exception to the above, some development on POS or UGS maybe permitted if it comprises:

- (a) small and unobtrusive development that is ancillary to the open space use and enjoyment of the land; or
- (b) development that facilitates or enhances public access to Urban Green Space; or
- (c) development that makes provision nearby for replacement open space of equal or better quality and size.

In identifying Public Open Space, the following uses should be applied to this policy: Sports and Recreation fields, Burial Spaces, Historic Parks, Gardens and Landscapes and any other space which breaks up the built form.

In exceptional circumstances, the Council may enter into s.106 negotiations to secure off-site provision of open space where no other suitable site can be found.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	New Open space provides a scenic and quiet place and the implementation of this policy will enhance this role. Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A

8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	Amenity space is important to providing sufficient and decent housing. This policy seeks to encourage further open space particularly within housing development as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S – L)	D	No enhancement measures suggested.
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in	++	P (L)	I	No enhancement measures suggested.

		educating the public to the wildlife in the borough could be an indirect benefit.				
16	Reduce crime	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S - L)	D	No enhancement measures suggested.
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design can reduce the fear of crime.	++	P (S - L)	I	Policy could include: FEAR OF CRIME .
<p><b>Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the appropriate strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.</b></p>						

<b>OS3 World Heritage Site Buffer Zone</b>						
The Council will give special consideration to developments within the declared World Heritage Site Buffer Zone as delineated on the Proposals Map, that may be visible from within the World Heritage Site. New developments on land within the buffer zone will be required to have no adverse visual impact on and enhance the World Heritage Site affecting the land within the Borough.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	No identified impact on this SA objective.	0	N/A	N/A	N/A
5	Biodiversity	No identified impact on this SA objective.	0	N/A	N/A	N/A
6	Air quality	No identified impact on this SA objective.	0	N/A	N/A	N/A
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	No identified impact on this SA objective.	0	N/A	N/A	N/A
9	Flood risk	No identified impact on this SA objective.	0	N/A	N/A	N/A
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	Open space is important to providing sufficient and decent housing. This policy seeks to encourage further open space as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	No identified impact on this SA objective.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	No identified impact on this SA objective.	0	N/A	N/A	N/A
15	Education	This policy seeks to educate the public but through conservation and protection management measures, a new role in educating the public to the history and heritage of views and vistas in the borough	++	P (L)	I	No enhancement measures suggested.

		could be an indirect benefit.				
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
18	Accessibility	No identified impact on this SA objective.	0	N/A	N/A	N/A
<p><b>Comment: although there are many economical and environmental objectives that are not covered by the policy. The importance of this policy on a social side gives weight to preserving our historic views and vistas for future enjoyment.</b></p>						

FOR CONSULTATION

#### OS4 Open space deficiencies

Proposals for large residential schemes will be acceptable in principle, providing that the provision of open space would not fall below 1.67ha/ per 1000 population and would be sited close to public transport links where feasible. If the proposal would be sited in an area of Open Space deficiency or would create an area of deficiency through the development, proposals should provide good quality open space commensurate to the proposed development and its occupiers.

In all major developments there is a requirement to provide public open space. In areas identified as being deficient in Public Open Space and shown on **Map XX**, the Council will concentrate its efforts to negotiate with developers for the provision of new open spaces as part of new housing schemes. In cases where this is not practicable, off site provision to improve existing open space or public access to existing open spaces may be considered as outlined in CP 22 of the Core Strategy.

In pursuant of this policy, planning obligations may be sought to ensure compliance with this policy.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	New Open space provides a scenic and quiet place and the implementation of this policy will enhance this role. Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of	++	P (S – L)	D	No enhancement measures suggested

		water for its own use.				
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	Amenity space is important to providing sufficient and decent housing. This policy seeks to encourage further open space particularly within housing development as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No identified impact on this SA objective.	0	N/A	N/A	N/A
15	Education	No identified impact on this SA objective.	0	N/A	N/A	N/A
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the	++	P (S - L)	I	No enhancement measures suggested.

		effects of crime but through better design can reduce the fear of crime.				
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**Comment:** The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.

FOR CONSULTATION

### OS5 Open space quality and maintenance

Proposals for new open space or development on existing open spaces should be of a good quality design which has regard to creating a safe and accessible design and where applicable allow for the creation of habitats for biodiversity purposes. For schemes which involve housing, play and informal recreation facilities should be provided within the scheme. For developments which involve the creation of open space, a landscape and maintenance statement should accompany planning applications.

In pursuant to this the policy, planning obligations may be sought to ensure compliance with this policy.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	No identified impact on this SA objective.	0	N/A	N/A	N/A
7	Transport	This policy encourages greater accessibility and quality of the borough's existing open spaces, this may encourage people to walkthrough the site safely and in attractive surroundings.	++	P (S – L)	D	No enhancement measures suggested
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but	++	P (S – L)	D	No enhancement measures suggested

		will aid in enhancing its role and historic character within the public realm.				
<b>Social</b>						
12	Sufficient & decent housing	Amenity space is important to providing sufficient and decent housing. This policy seeks to encourage further open space particularly within housing development as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S – L)	D	No enhancement measures suggested.
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S – L)	D	No enhancement measures suggested.
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in	++	P (L)	I	No enhancement measures suggested.

		educating the public to the wildlife in the borough could be an indirect benefit.				
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design can reduce the fear of crime.	++	P (S - L)	I	No enhancement measures suggested.
<p><b>Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.</b></p>						

<b>OS6 Trees</b>						
The Council will seek to prevent the loss of trees of amenity value when granting planning permission and, where appropriate, make Tree Preservation Orders for their protection.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S - L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S - L)	D	No enhancement measures suggested
6	Air quality	Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S - L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and	++	P (S - L)	D	No enhancement measures suggested

9	Flood risk	provision of open space. Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	No identified impact on this SA objective.	0	N/A	N/A	N/A
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No identified impact on this SA objective.	0	N/A	N/A	N/A
15	Education	No identified impact on this SA objective.	0	N/A	N/A	N/A
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	No identified impact on this SA objective.	0	N/A	N/A	N/A
18	Accessibility	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Comment: This policy achieves very positive outcomes within the environmental objectives as trees break up the built form and provide habitats and serve other functions such as water retention, oxygen producer and also a visually pleasing object.</b>						

## OS7 Biodiversity

Subject to other planning considerations, developments seeking to conserve or enhance the biodiversity and geological conservation interests of the area and/or the immediate locality should be permitted. The Council will seek :

- To protect, manage and enhance biodiversity;
- Protection of Sites of Importance for Nature Conservation and Green Corridors;
- To resist proposed development which would harm the population or conservation status of protected and priority species;
- Biodiversity enhancements in new developments;
- Promotion of public access and appreciation of nature;
- and a justification that no alternative sites were available to avoid any impact on habitats.

Only in this instance will the Council seek appropriate mitigation methods and/or other compensatory tools prior to, during and thereafter for so long as the development remains in existence, where development will cause harm to biodiversity.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	The retention of trees allows habitats to thrive and in doing so improves the amount of oxygen produce.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and	This policy seeks to enhance the	++	P (S – L)	D	No enhancement measures

	Townscapes	landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.				suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L )	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	No identified impact on this SA objective.	0	N/A	N/A	N/A
13	Human health	No identified impact on this SA objective.	0	N/A	N/A	N/A
14	Reduce poverty & exclusion	No identified impact on this SA objective.	0	N/A	N/A	N/A
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	No identified impact on this SA objective.	0	N/A	N/A	N/A
18	Accessibility	No identified impact on this SA objective.	0	N/A	N/A	N/A
<p><b>Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of encouraging wildlife in a safe environment. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.</b></p>						

<b>OS8 South East London Green Chain</b>						
The main opens spaces that form the South East London Green Chain are protected as MOL. These spaces will be promoted and managed in order to enhance their role as a local and regional outdoor recreational resource.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	New Open space provides a scenic and quiet place and the implementation of this policy will enhance this role. Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	This policy encourages greater accessibility and quality of the borough's existing open spaces, this may encourage people to walkthrough the site safely and in attractive surroundings.	++	P (S – L)	D	No enhancement measures suggested
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic	++	P (S – L)	D	No enhancement measures suggested

		character within the public realm.				
<b>Social</b>						
12	Sufficient & decent housing	Open space is important to providing sufficient and decent housing. This policy seeks to encourage further open space as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No identified impact on this SA objective.	0	N/A	N/A	N/A
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design	++	P (S - L)	I	No enhancement measures suggested.

can reduce the fear of crime.

**Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.**

FOR CONSULTATION

### OS9 River Corridors and the Waterlink Way

The Council will safeguard the Rivers and the proposed route of the Waterlink Way as shown on the Proposals Map. It will seek the reduction of impact on the natural environment and habitats by the most acceptable route. Through agreements with developers of sites within and adjoining the route some or all of the following elements, as appropriate, will be achieved:

- (a) to provide additional open space;
- (b) to improve the quality of the open spaces in Waterlink Way and the links between them, notably footpaths and cycleways;
- (c) to improve the course and appearance of the waterways and public access to them for passive and active recreation;
- (d) to create wildlife habitats and to enhance the existing nature conservation value of the waterways.
- (e) to ensure that a minimum buffer zone of 8 metres of reserved soft landscaped land is maintained alongside the river confluence.

The Council will, where appropriate, protect land within and adjacent to River Corridors and the Waterlink Way by seeking planning obligations where development would compromise its strategic role.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	No identified impact on this SA objective.	0	N/A	N/A	N/A
7	Transport	This policy encourages greater accessibility and quality of the borough's existing open spaces, this may encourage people to explore river transportation where feasible to do so.	++	P (S – L)	D	No enhancement measures suggested
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of	++	P (S – L)	D	No enhancement measures suggested

		water for its own use.				
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	Open space is important to providing sufficient and decent housing. This policy seeks to encourage further open space as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	++/-	P (S – L)	D	No enhancement measures suggested
13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S – L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S – L)	D	No enhancement measures suggested.
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection	++	P (S - L)	I	No enhancement measures suggested.

		management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.				
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design can reduce the fear of crime.	++	P (S - L)	I	No enhancement measures suggested.
<p><b>Comment: The development of this policy seeks to address the social, environmental and economic needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment and to promote economic rejuvenation. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.</b></p>						

FOR CONSULTATION

<b>OS10 Green Corridors</b>						
The Green Corridors identified on the Proposals Map are protected for their nature conservation and informal recreation value. Planning Permission will only be granted for developments within Green Corridors that enhance these roles.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No identified impact on this SA objective.	0	N/A	N/A	N/A
2	Employment	No identified impact on this SA objective.	0	N/A	N/A	N/A
<b>Environmental</b>						
3	Minimise waste	No identified impact on this SA objective.	0	N/A	N/A	N/A
4	Water resources	This will have a direct and positive effect on the future of the borough's water courses	++	P (S – L)	D	No enhancement measures suggested
5	Biodiversity	This will have a direct and positive effect on the future of the borough's flora and fauna and the longevity of the borough's open space	++	P (S – L)	D	No enhancement measures suggested
6	Air quality	New Open space provides a scenic and quiet place and the implementation of this policy will enhance this role. Trees produce oxygen from the harmful carbon dioxide which aid in improving air quality.	++	P (S – L)	D	No enhancement measures suggested
7	Transport	No identified impact on this SA objective.	0	N/A	N/A	N/A
8	Energy use and Climate Change	This policy will aid in the normalising of the climate through the vegetation and provision of open space.	++	P (S – L)	D	No enhancement measures suggested
9	Flood risk	Open Spaces are generally abundant in permeable surfaces allowing collection of rainwater and slow drainage. Vegetation also acts as a natural defence slowing down the flow of water and absorption of water for its own use.	++	P (S – L)	D	No enhancement measures suggested
10	Landscapes and Townscapes	This policy seeks to enhance the landscapes and townscapes to create a safe and pleasant environment. This policy will further strengthen this objective.	++	P (S – L)	D	No enhancement measures suggested
11	Historic environment	The implementation of this policy is unlikely to impact on the historic characteristics but will aid in enhancing its role and historic character within the public realm.	++	P (S – L)	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	No identified impact on this SA objective.	0	N/A	N/A	N/A

13	Human health	Open space is considered to be an important tool for people who wish to keep fit or aid in rehabilitation. Some studies also indicate open spaces help to relieve people of stress like symptoms and provide a break from the built environment.	++	P (S - L)	D	No enhancement measures suggested
14	Reduce poverty & exclusion	The use of open space is a widely recognised community asset which brings people from all walks of life for leisure and relaxation. This policy encourages social cohesion within the borough's diverse community.	++	P (S - L)	D	No enhancement measures suggested.
15	Education	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (L)	I	No enhancement measures suggested.
16	Reduce crime	No identified impact on this SA objective.	0	N/A	N/A	N/A
17	Community welfare	With the implementation of this policy, new areas for wildlife will be able to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit.	++	P (S - L)	I	No enhancement measures suggested.
18	Accessibility	Better designed spaces will aid in natural surveillance and reduce the opportunities for crime related activities. This policy aims to make this a requirement. The policy at the moment does not specifically mention crime. Crime occurs for a variety of reasons and in different types of locations. As such the policy does not seek to mitigate the effects of crime but through better design can reduce the fear of crime.	++	P (S - L)	I	No enhancement measures suggested.

**Comment: The development of this policy seeks to address the social and environmental needs of the boroughs inhabitants directly and indirectly through realising the importance of open space as an outlet for society, to encourage wildlife in a safe environment. It is considered that no enhancement or mitigation measures are needed at this stage as the policy covers the strategic objectives well. There are some uncertainties and risks that could prevent the policy from being fully realised and this could stem from changes in central and regional government, extreme climate change, economic change and population growth.**

### SE1 Energy efficiency for residential development

The Council will require all new residential dwellings to achieve an energy efficiency rating and an environmental (CO<sub>2</sub>) impact rating of 'A' as part of the Energy Performance Certificate. The Council will expect this to be supported by a commitment to achieve this rating at the detailed design stage.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect				
2	Employment	No significant effect				
<b>Environmental</b>						
3	Minimise waste	No significant effect				
4	Water resources	No significant effect				
5	Biodiversity	No significant effect				
6	Air quality	No significant effect				
7	Transport	No significant effect				
8	Energy use and Climate Change	An A rating will ensure that the dwellings are achieving the highest energy efficiency rating and hence reducing CO <sub>2</sub> emissions	++	P S-L	D	No enhancement measures suggested
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	No significant effect				
11	Historic environment	No significant effect				
<b>Social</b>						
12	Sufficient & decent housing	High energy efficiency will help reduce fuel costs and alleviate fuel poverty	+	P S-L	D	No enhancement measures suggested
13	Human health	Energy efficient homes are well insulated which reduces dampness and hence reduces associated ill health	+	P S-L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect				
15	Education	No significant effect				
16	Reduce crime	No significant effect				
17	Community welfare	No significant effect				
18	Accessibility	No significant effect				

Comment: The policy impacts positively on energy and climate change objectives and social objectives related to decent housing and health.

### SE2 Energy efficiency and renewables for major developments

The Council will require proposals for major developments with a floor space of over 1000m<sup>2</sup>, or ten or more residential units to:

- a) Provide an assessment of energy demand and the expected energy and CO2 emissions savings from energy efficiency and renewable energy measures incorporated into the development, including the feasibility of CHP/CCHP and community heating systems.
- b) Achieve a 3\* rating under the Code for Sustainable Homes or BREEAM 'Very Good rating'. The Council will expect this to be supported by a commitment to achieve certification under an appropriate scheme at the detailed design stage.
- c) To incorporate on-site renewable energy equipment to reduce predicted CO2 emissions by at least 20%. Applicants will be required to provide a full feasibility study of all renewable technologies considered.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Potential positive effect due to increase in demand for green industry and services	+	T S-L	D	Enhanced by partnership working with local employment sector and local service providers
2	Employment	Potential positive effect due to increase in demand for green industry and services	+	T S-L	D	Enhanced by partnership working with local employment sector and local service providers
<b>Environmental</b>						
3	Minimise waste	The CSH includes provision facilities for recycling and waste, and applies the waste hierarchy	+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
4	Water resources	The CSH includes requirements for grey water harvesting and water saving devices	+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
5	Biodiversity	The CSH can include Incorporation of green roofs which will help biodiversity	+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
6	Air quality	The CSH includes incorporation of green travel plans and restricting car usage, which improves air quality	+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
7	Transport	The CSH includes incorporation of green travel plans and restricting car usage, which improves air quality	+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
8	Energy use and Climate Change	The policy will reduce CO2 emissions and energy consumption significantly	++	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
9	Flood risk		+	P S-L	D	Enhancement by increasing the required 3* rating to 4* or more
10	Landscapes and Townscapes	Potential negative effect from new technology may have an influential impact on the quality of the townscape and landscape	-	P S-L	D	Adherence to local context and character of its surroundings.
11	Historic environment	No significant effect	0			
<b>Social</b>						

12	Sufficient & decent housing	Potentially positive due to energy costs being reduced due to high standards of construction. Can reduce the number of homes built to the expense to incorporate these technologies.	+	P S-L	D	No enhancement measures suggested
13	Human health	Positive effect in the long run as less natural resources will be burned giving rise to a cleaner atmosphere.	+	P L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	Positive effect in educating the population about energy consumption and renewable energy technology.	+	P S-L	I	No enhancement measures suggested.
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			

Comment: The relevant SA objectives are largely positive with only the effect on Landscapes and Townscapes giving a negative effect. This could be overcome through sensitive design so that new technology can integrate with the existing built environment.

### SE3 Stand alone and roof mounted renewable energy

Installation of stand alone and roof mounted renewable energy schemes will be permitted provided that the following criteria are met:

- a) the impact of noise and vibration from mechanical components is considered satisfactory;
- b) the visual amenity from public viewpoints is safeguarded;
- c) there is no adverse impact from reflected light and shadow flicker on adjoining land-uses; and,
- d) any impact on open space areas / conservation areas / historic buildings/ general character of the area, is considered satisfactory.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Potential positive effect due to increase in demand for green industry and services	+	T S-L	D	Enhanced by partnership working with local employment sector and local service providers
2	Employment	Potential positive effect due to increase in demand for green industry and services	+	T S-L	D	Enhanced by partnership working with local employment sector and local service providers
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			

6	Air quality	Potentially positive as generally stand alone and roof mounted renewable energy technology do not impact on the air quality.	+	P S-L	I	No enhancement measures suggested.
7	Transport	No significant effect	0			
8	Energy use and Climate Change	Positive effect on the environment by using renewable energy.	++	P S-L	D	No enhancement measure suggested.
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	Potential negative effect through the poorly designed stand alone and roof mounted technology.	-	P S-L	D	Design of this new technology should be in keeping with the local context and character of the area.
11	Historic environment	Potential negative effect through the poorly designed stand alone and roof mounted technology.	-	P S-L	D	Design of this new technology should be in keeping with the local context and character of the area.
<b>Social</b>						
12	Sufficient & decent housing	Positive effect as this policy will aid in achieving a decent housing by reducing future energy bills	+	P M-L	D	No enhancement measures suggested.
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	More information on renewable energy is a positive factor in educating the borough of the benefits of using renewable energy.	+	P S-M	D	No enhancement measures suggested.
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: very positive effects with regard to economic, environmental and social objectives but the policy will need to overcome the pressure for new developments to fit in with the development so that its visual impact is reduced.						

#### SE4 Flood risk

Planning applications for development proposals of 1ha or greater in flood zone 1 and all proposals for new development located in flood zones 2 and 3, as identified in the flood risk figure 8 may be required to submit a site-specific flood risk assessment with the planning application.

The suitability of the proposed development will be determined by applying the sequential test, and where necessary the exceptions test, as outlined in PPS25.

Where necessary the applicant will be required to contribute to the cost of works to provide, improve and maintain flood defences via planning conditions or s106 agreements

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						

1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	The policy will have a positive effect on preventing clean water being contaminated by rain and sea water.	+	T S-M	D	No enhancement measure suggested.
5	Biodiversity	Positive effect on habitats within close proximity of flood zone 3 as new developments will mitigate its effects	+	T S-L	D	Habitats nearby new developments should seek to protect these habitats within their flood defences.
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	Positive effect although unsure how effective this option may be until a flood occurs.	+ -	P L	D	Contingency and emergency planning should be encouraged within all defences.
10	Landscapes and Townscapes	There maybe a negative effect on the landscape by constructing flood defences.	-	P S-L	D	Proposals should adapt to the value of a town.
11	Historic environment	There maybe a negative effect on the landscape by constructing flood defences.	-	P S-L	D	Proposals should adapt to the value of a town.
<b>Social</b>						
12	Sufficient & decent housing	Potential negative effect as housing should not be designated within areas at risk of flooding	-	P L	D	Housing should be avoided at all costs unless significant social or economic factors outweigh its designation.
13	Human health	The policy seeks to prevent all possible risk to human health. As such this policy is positive.	+	P S-L	D	No enhancement measures suggested.
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: the policy is in place for an event which may happen once within 50 years. As such it will be very hard to test whether the policy is capable of preventing catastrophic damage in the short to medium term.						

### SE5 River water quality

The Council will seek to protect and enhance Lewisham's Blue Ribbon Network to provide a safe, healthy and attractive river environment. The Council will oppose proposals that are likely to lead to a reduction in water quality, unless suitable mitigational measures are provided.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	Good employment opportunities for people working with the river and its tributaries	+	P S-L	D	No enhancement measures suggested.
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	Positive effect on the water quality	+	P S-L	D	No enhancement measures suggested
5	Biodiversity	Positive effect on local habitats through the strengthening of this policy.	+	P S-L	D	No enhancement measures suggested
6	Air quality	No significant effect	0			
7	Transport	By encouraging safe and attractive river environment will encourage more people to travel via the river.	++	P M-L	D	No enhancement measures suggested
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	An attractive river will enhance the townscape	++	P S-L	D	No enhancement measures suggested
11	Historic environment	The rivers are part of Lewisham's historic environment and retaining them in their natural form preserves the character of the local areas which they flow through	++	P S-L	D	No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	Some positive effect as the policy will encourage people to use the open spaces along the rivers for recreation.	+	P S-L	D	Provide safe and secure access to the rivers. Implemented via development policies and
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy shows significant positive effects for the environmental objectives and employment and human health. Enhancement measures include ensuring that policies on safe transport and access are implemented.						

### SE6 Water resources

The Council will protect and conserve water supplies in order to secure Lewisham's long term needs.

Planning permission will only be granted for development which increase the demand for off-site service infrastructure (water supply, sewer drainage and treatment) where:

- (a) Sufficient capacity already exists, or
- (b) Extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

When there is a capacity problem and improvements in offsite infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	The policy will preserve water resources and ensure that water abstraction is sustainable	++	P S-L	D	No enhancement measures suggested
5	Biodiversity	Securing water resources will have long term benefits for the natural environment.	++	P M-L	D	No enhancement measures suggested
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	No significant effect	0			
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	The provision of sufficient water is vital for survival.	++	P L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			

Comment: The policy secures water resources which shows positive effect for human health, natural environment and water resources. Provision of water is essential for survival so it is important that long term needs are secured.

### SE7 Sustainable urban drainage systems (SUDS)

The Council will require applicants to demonstrate how surface water run-off is managed as close to its source as possible. The use of sustainable urban drainage systems will be encouraged for all developments. Preference will be given to proposals that ensure that adequate water resources are available and that:

- Minimise the use of treated water
- Maximise rainwater harvesting opportunities
- Incorporate grey water recycling systems.

The Council will require proposals for developments on brownfield sites with a floor space of 1000m<sup>2</sup>, or ten or more residential units to demonstrate through calculations that the rate of run-off of surface water from the site is less than the conditions before development.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Some initial negative effects as the added cost of SUDS to development proposals may affect development in the borough. However, increase in demand for SUDS technologies may create local business opportunities and hence economic growth	- /++	P S-L	D	No enhancement measures suggested
2	Employment	Some initial negative effects as the added cost of SUDS to development proposals may affect development in the borough. However, increase in demand for SUDS technologies may create local business opportunities and hence create employment opportunities	- /++	P S-L	D	No enhancement measures suggested
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	SUDS will reduce surface run-off and help replenish water reservoirs	++	P S-L		No enhancement measures suggested
5	Biodiversity	Green roofs used as SUDS will increase the biodiversity potential	+			No enhancement measures suggested
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			

9	Flood risk	SUDS significantly help reduce flood risk by reducing surface run-off	++			No enhancement measures suggested
10	Landscapes and Townscapes	No significant effect	0			
11	Historic environment	No significant effect	0			No enhancement measures suggested
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	Positive effects where school children can learn about how to protect natural resources	+	T S-L	I	Links with educational boards to use examples of SUDS as educational material
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy reduces surface run-off and protects water resources. Can be enhanced by promoting examples of SUDS with educational boards						

### SE8 Air Quality

The council will require development proposals to take air quality into account with other material considerations, and provide an air quality assessment where considered appropriate by the Council. Where necessary the development proposal will be required to provide appropriate mitigation measures which will be implemented by a condition or planning obligation (s106 agreement).

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	No significant effect	0			
5	Biodiversity	The policy will reduce stresses on flora and fauna caused by air pollutants	+	P S-L	D	No enhancement measures suggested
6	Air quality	The policy will ensure that air quality is considered in development proposals and where necessary mitigation is provided	++	P S-L	D	No enhancement measures suggested
7	Transport	Where development proposals are found to generate road traffic this will affect air	+	P S-L	D	No enhancement measures suggested

		quality. Hence the policy is likely to require sustainable modes of transport.				
8	Energy use and Climate Change	Where development proposals are found to generate road traffic this will affect air quality. Hence the policy is likely to require a reduction in road traffic which reduces fossil fuel consumption.	+	P S-L	D	No enhancement measures suggested
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	High levels of particulate matter and acid rain formed by Sox emissions can deteriorate building materials. The policy will prevent this from happening.	+	P M-L	D/I	
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	The policy will ensure that housing developments are built appropriately so that occupiers are not affected by vehicle emissions and noise.	+	P M-L	I	
13	Human health	The policy will ensure that the effects of NOx and Pm10 are reduced by reducing emissions.	++	P S-L	D	
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy has significantly positive effects on human health and air quality. Enhancement can be achieved by ensuring that mitigation measures are implemented where necessary.						

### SE9 Development on Contaminated Land

Where development is proposed on contaminated land, or land suspected of being contaminated, the council requires the developers to:

- (a) submit a contaminated land survey
- (b) identify any contamination of land and provide details of proposed remedial treatment which can be required as a condition on a planning application or through a planning obligation.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			

Environmental						
3	Minimise waste	No significant effect	0			
4	Water resources	The policy will protect ground water resources and river water quality by reducing risk of soil contaminants entering water courses and reservoirs by percolation.	+	P S-L	D	No enhancement measures suggested
5	Biodiversity	No significant effect				
6	Air quality	Risk of release of toxic fumes is reduced	+	P S-L	D	No enhancement measures suggested
7	Transport	No significant effect				
8	Energy use and Climate Change	No significant effect				
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	No significant effect				
11	Historic environment	No significant effect				
Social						
12	Sufficient & decent housing	Remediation of contaminated land can make additional land available for housing developments	+	P S-L	D	No enhancement measures suggested
13	Human health	Remediation of contaminated land will reduce the risk of toxic substances affecting human health	+	P S-L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect				
15	Education	No significant effect				
16	Reduce crime	No significant effect				
17	Community welfare	No significant effect				
18	Accessibility	No significant effect				
Comment: The policy reduces the risk of toxic substances in the environment affecting human health and entering water courses.						

### SE10 Noise and vibration

Where noise/vibration-sensitive development is proposed close to an existing source, or when a noise/vibration generating development is proposed, a detailed noise/vibration impact survey will be required outlining attenuation measures.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
Economic						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			

Environmental						
3	Minimise waste	No significant effect	0			
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	No significant effect	0			
11	Historic environment	No significant effect	0			
Social						
12	Sufficient & decent housing	The policy ensures that housing developments are sited appropriately so that they are not affected by noise and vibration	++	P S-L	D	No enhancement measures suggested
13	Human health	The policy will help reduce noise and vibration related health effects such as stress and insomnia.	++	P S-L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	Appropriate siting of developments will benefit communities by creating more pleasant built environments	+	P S-L	D	No enhancement measures suggested
18	Accessibility	No significant effect	0			
Comment: The policy will ensure that developments are sited appropriately and that noise and vibration is take into consideration in development proposals which will reduce stresses on human health and provide decent homes.						

SE11 Light attenuation						
Proposals for light-generating development, floodlights or otherwise obtrusive lighting will be required to be accompanied by a detailed light-impact survey outlining attenuation measures.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
Economic						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
Environmental						

3	Minimise waste	No significant effect	0			
4	Water resources	No significant effect	0			
5	Biodiversity	Light impacts flora and fauna and the policy will help reduce light pollution	+	P S-L	D	No enhancement measures suggested
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	A reduction in light pollution will enhance the character of the townscape	+	P S-L	D	No enhancement measures suggested
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	Reducing light pollution around housing developments will make the environment more pleasant	+	P S-L	D	No enhancement measures suggested
13	Human health	Light pollution can affect human health by symptoms such as insomnia	+	P S-L	D	No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	The policy will ensure that the overall local environment is pleasant	+	P S-L	D	No enhancement measures suggested
18	Accessibility	No significant effect	0			
Comment: The policy reduces the effect obtrusive lights may have on the environment.						

### SE12 Construction waste and aggregates

Developments will be required to demonstrate how they will contribute towards reducing and recycling construction, demolition and excavation waste. Information on these measures must be submitted with an application.

The Council will require that new developments over 1000m<sup>2</sup>, or 10 dwellings should submit and implement a site waste management plan to minimise the disposal of wastes to landfill, by reducing waste of materials on site and promoting reuse, segregation, recycling and composting of wastes that arise. The waste management plan is required to evaluate what level of reuse and recycling is possible and set targets for materials diverted from landfill.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Potentially short term negative impacts as the policy require developers to put in	-/+	P S-L	I	

		additional resources. The policy may however create local business opportunities				
2	Employment	Potentially short term negative impacts as the policy require developers to put in additional resources. The policy may however create local business opportunities and hence employment opportunities.	-/+	P S-L	I	
<b>Environmental</b>						
3	Minimise waste	Direct positive effect on waste minimisation	++	P S-L	D	No enhancement measures suggested
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	Minimisation of waste will reduce the need to provide additional waste management locations	+	P L	D	No enhancement measures suggested
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy has some significantly positive effects on waste minimisation and townscapes. The policy could also be beneficial for the local economy						

### SE13 Construction materials

The Council will require

- a) all development proposals to demonstrate how they intend to contribute towards using construction materials from sustainable resources and use recycled and reused materials. Information on these will be required to be submitted with the application;
- b) all major developments over 1000m<sup>2</sup> or 10 dwellings or more, to source at least 10% of the total value of material used from recycled and reused materials;
- c) developments which require demolition of an existing building will be encouraged to recycle and/or reuse reclaimed materials for the proposed development.

The Developer will be expected to follow the principles and procedures from the ICE Demolition Protocol.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Potentially short term negative impacts as the policy require developers to put in additional resources. The policy may however create local business opportunities	-/+	P S-L	I	
2	Employment	Potentially short term negative impacts as the policy require developers to put in additional resources. The policy may however create local business opportunities and hence employment opportunities.	-/+	P S-L	I	
<b>Environmental</b>						
3	Minimise waste	Direct positive effect on waste minimisation	++	P S-L	D	No enhancement measures suggested
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	Minimisation of waste will reduce the need to provide additional waste management locations	+	P L	D	No enhancement measures suggested
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy has some significantly positive effects on waste minimisation and townscapes. The policy could also be beneficial for the local economy						

### SE14 Hazardous substances

The Council will require any proposed or existing development containing hazardous substances to be stored in a manner that meets National Regulations, limits the risk to human health and safety and avoids contamination of air, ground and water resources.

Full details of mitigational storage facilities for hazardous substances will be required before a planning application is considered.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
<b>Environmental</b>						
3	Minimise waste	No significant effect	0			
4	Water resources	The policy reduces the risk of hazardous substances contaminating water courses and resources	++	P S-L		No enhancement measures suggested
5	Biodiversity	No significant effect	0			
6	Air quality	The policy reduces the risk of accidental release of toxic fumes	++	P S-L		No enhancement measures suggested
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	No significant effect	0			
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	The policy reduces the risk of hazardous substances affecting human health	++	P S-L		No enhancement measures suggested
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	A reduction of risk to human health provides a sense of safety for the local environment	+	P S-L		No enhancement measures suggested
18	Accessibility	No significant effect	0			

Comment: The policy will prevent hazardous substances contaminating the environment and becoming a threat to human health

### SE15 Residential waste facilities

The Council will require all new residential developments to provide sufficient waste storage and recycling facilities.

Planning applications for residential developments will consider the following:

- The provision of facilities to recycle or compost household waste by means of a separated dedicated storage space.
- Appropriate siting of waste storage and recycling facilities within the development, visual screening and health and safety precautions.

Requirements for planning obligations will be used in pursuit of this policy

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect	0			
2	Employment	No significant effect	0			
<b>Environmental</b>						
3	Minimise waste	Some benefits as the policy will encourage recycling for householders.	+	P S-L	D	No enhancement measures suggested
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	No significant effect	0			
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	The policy will enable easy access to recycling facilities	+	P S-L	D	No enhancement measures suggested
Comment: The policy directly benefits recycling and waste reduction. The policy complements other policies on waste management hence no enhancement measures have						

been suggested.

**SE16 Waste facilities in commercial and large scale development**

The Council will require all new commercial/business operations to provide designated space for waste storage and recycling facilities, and to demonstrate how they will contribute towards reducing operational waste and increasing segregation and recycling of waste.

Applicants proposing large-scale developments or developments that employ or attract a large number of people, such as supermarkets or industrial units, should provide appropriately designed facilities for the collection for recycling or re-use of the waste that they, their customers or they staff generate. Applicants should submit a comprehensive waste and recycling management strategy.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth					
2	Employment					
<b>Environmental</b>						
3	Minimise waste					
4	Water resources					
5	Biodiversity					
6	Air quality					
7	Transport					
8	Energy use and Climate Change					
9	Flood risk					
10	Landscapes and Townscapes					
11	Historic environment					
<b>Social</b>						
12	Sufficient & decent housing					
13	Human health					
14	Reduce poverty & exclusion					
15	Education					
16	Reduce crime					
17	Community welfare					
18	Accessibility					

Comment:

### SE17 Provision of new waste management sites

The Council will consider following criteria when assessing applications for waste management facilities:

#### Location

1. the waste management facility is in a strategic employment area
2. it is compatible with adjoining land uses.
3. the distance travelled for waste is minimised (particularly through noise sensitive areas) and sustainable modes of transport such as rail and river transport are encouraged
4. there is no adverse effects on surface and underground water, nor land stability;
5. the facility is not visually intrusive, and has appropriate screening / landscaping;

#### Conditions

1. The applicant will be required to mitigate any adverse effects that the development has on the natural environment and nuisance caused by excessive air pollutants, odour, noise, litter, vermin or birds;
2. the applicant will be required to ensure that hours of operation and duration of operations are controlled so as not to disturb neighbours;

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?,-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Potentially short term negative impacts as the policy require developers to put in additional resources. The policy may however create local business opportunities	-/+	P S-L	I	
2	Employment	Potentially short term negative impacts as the policy require developers to put in additional resources. The policy may however create local business opportunities and hence employment opportunities.	-/+	P S-L	I	
<b>Environmental</b>						
3	Minimise waste	Direct positive effect on waste minimisation	++	P S-L	D	No enhancement measures suggested
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			

8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	Minimisation of waste will reduce the need to provide additional waste management locations	+	P L	D	No enhancement measures suggested
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	No significant effect	0			
Comment: The policy has some significantly positive effects on waste minimisation and townscapes. The policy could also be beneficial for the local economy						

### SE18 Protection of existing waste management sites

1. The Council will encourage retention of existing waste management sites in Strategic Employment Areas unless appropriate compensatory provision is made (policy applying to council managed waste management facilities, and private enterprises).
2. Existing sites in mixed use areas will be relocated within Strategic Employment Areas if a need is identified.
3. The council will encourage new, and change of existing, waste management facilities to recycling and reuse facilities.

No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy ensures that waste management sites are appropriately located in the proximity of other employment uses that could complement waste management. A change to recycling and reuse could generate local business opportunities.	+	P S-L	D	No enhancement measures suggested
2	Employment	The policy ensures that waste management sites are appropriately located in the proximity of other employment uses that could complement waste management and create employment opportunities	+	P S-L	D	No enhancement measures suggested
<b>Environmental</b>						
3	Minimise waste	Point 3 of the policy will encourage industry	+	P	D	No enhancement measures

		to shift towards recycling and reuse which may encourage a demand for recycled and reused materials		S-L		suggested
4	Water resources	No significant effect	0			
5	Biodiversity	No significant effect	0			
6	Air quality	No significant effect	0			
7	Transport	No significant effect	0			
8	Energy use and Climate Change	No significant effect	0			
9	Flood risk	No significant effect	0			
10	Landscapes and Townscapes	The location of waste management sites will be consistent with other uses and preserve the character of the local area	+	P S-L	D	No enhancement measures suggested
11	Historic environment	No significant effect	0			
<b>Social</b>						
12	Sufficient & decent housing	No significant effect	0			
13	Human health	No significant effect	0			
14	Reduce poverty & exclusion	No significant effect	0			
15	Education	No significant effect	0			
16	Reduce crime	No significant effect	0			
17	Community welfare	No significant effect	0			
18	Accessibility	The policy ensures that waste sites are located in areas of good public transport	+	P S-L	D	No enhancement measures suggested
Comment: The policy ensures an appropriate location for waste management facilities that is consistent with the local environment and that provides access to local people						

### SE19 Living roofs for biodiversity

The Council will encourage all new developments to incorporate a green/brown roof system. Development proposals, other than minor developments, will be required to provide a statement on the feasibility of incorporating a green/brown roof system at the detailed design stage.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy may encourage some local business opportunities if green roof system installers are sourced locally	+	P S-L	D	
2	Employment	The policy may encourage some local business and employment opportunities if green roof system installers are sourced locally	+	P S-L	D	

Environmental						
3	Minimise waste	No significant effect				
4	Water resources	A green roof system can act as a SUDS and reduce surface run off which can improve water resources	+	P S-L	D	
5	Biodiversity	A green roof increase opportunities for biodiversity and flora and fauna	++	P S-L	D	
6	Air quality	No significant effect				
7	Transport	No significant effect				
8	Energy use and Climate Change	A green roof reduces the heat island effect and acts an insulant on the roof which increases the energy efficiency of the building	++	P S-L	D	
9	Flood risk	A green roof system can act as a SUDS and reduce surface run off which in turn will reduce flood risk	++	P S-L	D	
10	Landscapes and Townscapes	Positive and negative effects as green roofs may change the character of the townscape. Uncertain whether this will be a positive or negative effect	+/-	P S-L	D	
11	Historic environment	No significant effect				
Social						
12	Sufficient & decent housing	A green roof acts as an insulant, which increases energy efficiency and reduces the running costs of the internal heating	+	P S-L	D	
13	Human health	A green roof acts as an insulant, which increases energy efficiency and reduces the running costs of the internal heating. This can help reduce fuel poverty and produce a more comfortable internal atmosphere.	+	P S-L	D	
14	Reduce poverty & exclusion	No significant effect				
15	Education	Green roof systems can be used as examples for educational material about environmental sciences	+	P S-L	D	
16	Reduce crime	No significant effect				
17	Community welfare	No significant effect				
18	Accessibility	No significant effect				
<p>Comment: The policy shows positive effects for a number of SA objectives. The policy could potentially be enhanced by changing the word 'encourage' to 'require' green roof systems. The implications of this are however uncertain with regards to design of development of site specific issues.</p>						

The Council has identified in the Site Allocations Document and on the Proposals Map, the larger sites which it is promoting for development, with an indication of the uses and general form and density of development that will be considered appropriate for these sites.

The Council will be seeking a high standard of design and townscape quality on these identified sites, and on all sites that may come forward for development during the lifetime of this document.

New development will need to have regard to the following principles:

- (a) The quality of design, including sufficient and well functioning private and public amenity spaces;
- (b) Urban design principles including acknowledgement and respect for the prevailing character of the area (see other policies in this chapter);
- (c) The location of the development in relation to amenity facilities including but not limited to: open space, leisure facilities, shops and cultural facilities;
- (d) Maintenance of adequate daylight and sunlight to adjoining buildings and land and preservation of residential amenity;
- (e) Maintenance of the existing landscape quality or any nature conservation interests including topography, landscape setting, ridges and natural features
- (f) Development of large (10 dwellings or greater and/or greater than 0.5 ha) or existing employment sites (larger than 0.5ha) should be undertaken within the context and framework of a master plan, or planning brief for the site. The Local Planning Authority will determine whether a master plan, or planning brief is required,
- (h) The Council's car parking policies as set out in Table 1 Lewisham Car Parking standards;
- (i) Maximise energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscaping design;
- (j) The nature conservation value and biodiversity of the site;
- (k) Achieve a 3\* star rating under the Code for Sustainable Homes or BREEAM 'Very Good rating'.

Explanatory Text and London Plan Definitions  
Density Matrix

New development should normally be built within the following illustrative density ranges, according to whether the site falls within what is determined to be a Central, Urban or Suburban character area. For guidance purposes only, and NOT forming part of this policy, the range of density that **might** be appropriate is shown below:

Setting and Location	Accessibility Index (PTAL)	Predominant Housing Type		
		Detached and linked houses	Terraced houses and flats	Mostly flats
<b>CENTRAL</b>	<b>6-4</b>		450-700 hr/ha 165-275 u/ha Ave. 3.0 hr/u	650-1000 hr/ha 240-435 u/ha Ave. 2.7 hr/u
<b>URBAN</b> e.g. Major or District town centres and regeneration areas.	<b>6-4</b>		200-450 hr/ha 55-175 u/ha Ave. 3.1 hr/u	450-700 hr/ha 165-275 u/ha Ave. 3.0 hr/u

Areas within 10 min walk/800 m of the above town centres				
e.g. District town centre and sites along major transport corridors.	<b>3-2</b>	180-210 hr/ha u/ha Ave. hr/u	200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	300-450 hr/ha 100-150 u/ha Ave. 3.0 hr/u
e.g. District town centre and sites along major transport corridors.	<b>2-0</b>	180-210 hr/ha u/ha Ave. hr/u	180-210 hr/ha u/ha Ave. hr/u	180-210 hr/ha u/ha Ave. hr/u
<i>URBAN Parking provision</i>		1.5 space per unit	1.5-1 space per unit	Less than 1 space per unit
<b>SUBURBAN</b>  e.g. District town centres  Areas within 10 min walk/800 m of a town centre.	<b>6-4</b>	180-210 hr/ha 240-435 u/ha Ave. 2.7 hr/u	200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	250-350 hr/ha 80-120 u/ha Ave. 3.0 hr/u
	<b>3-2</b>	150-200 hr/ha 30-65 u/ha Ave. 4.4 hr/u	200-250 hr/ha 50-80 u/ha Ave. 3.8 hr/u	
Currently remote	<b>2-1</b>	150-200 hr/ha 30-50 u/ha Ave. 4.6 hr/u		
<i>SUBURBAN Parking Provision</i>		1.5 space per unit	1.5-1 space per unit	Less than 1 space per unit

#### Notes to the Density Matrix

- Note 1: In all settings, larger sites (greater than 0.5 ha) should be developed with a mix of house types. See policy H1 and H2 on housing mix.
- Note 2: In a suburban setting, larger sites (greater than 0.5 ha) should be developed with a mix of house types. The majority of the site should be developed with non-flatted style housing. Car parking provision will not be permitted to exceed 1.5 spaces per unit in this circumstance.
- Note 3: All the above densities and parking provision ratio's are indicative and may need to be adjusted if it is considered that the (off-street and) on-street parking capacity is inadequate.
- Note 4: If the urban context is appropriate higher densities for sites up to the maximum allowable in the above table with good public transport accessibility, may be appropriate in the following circumstances:  
 (a) where the site is intended for permanent occupation by the elderly or students  
 (b) is located in the Thames Policy Area as shown on the Proposals Map  
 (c) is within a mixed use scheme where housing is combined with uses such as commercial, retail or industrial development.  
 Commercial and industrial developments will be expected to maximise plot ratios between a range of 1:3 to 1: 5 dependent on public transport availability

and capacity.

Note 5: Density ranges for sites within Lewisham and Catford Major Town Centres are dealt with in the relevant Area Action Plan documents.

Note 6: Conservation areas: The primary consideration when considering the question of density in Conservation Areas will be whether a proposed development preserves or enhances the character or appearance of the area.

#### ANNEX 1 - NOTE ON LONDON PLAN DEFINITIONS

London Plan paragraph 4.47 states 'Appropriate density ranges are related to location, setting in terms of existing building form and massing and the index of Public Transport Accessibility (PTAL). Site setting can be defined as:

Central – very dense development, large building footprint and building of 4-6 stories and above, such as larger town centres all over London and much of central London.

Urban – dense development with a mix of different uses and buildings of 3-4 stories, such as town centres, along main arterial routes and substantial parts of inner London.

Suburban – lower density development, predominantly residential, 2-3 stories, as in some parts of inner London and much of outer London.

Definition of density: 'Residential density figures should be based on net residential area which includes internal roads and ancillary open spaces'

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	High quality design and a high standard of development means that development is sustainable in the long term. Good quality environments in general attract economic growth by raising the quality of areas and attracting new investment. Appropriate density to make the best overall use of sites dependent on context will ensure the best economic use of sites.	++	P (S – L)	I	
2	Employment	High quality design and a high standard of development means that development is sustainable in the long term. Good quality environments in general attract economic growth by raising the quality of areas and attracting new investment. Appropriate density to make the best overall use of sites dependent on context will ensure the best economic use of sites and thereby contribute to the creation of jobs.	++	P (S – L)	I	
<b>Environmental</b>						
3	Minimise waste	The construction of new development will have short term negative effects on construction waste. New residential development will generate increased amounts of waste.	--	(S – L) P/T	D	Require disposal of waste ( and construction waste) according to the waste hierarchy. Encourage residential occupants to recycle and to reduce the amount of packaging by the choice of goods purchased.
4	Water resources	The development of sites at a higher level and density of use will increase the use of water resources. However there	--/+	(S - L) P	D	Many developments have roofs of a suitable pitch for living roof

		will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.				installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy requires biodiversity to be taken into account in development proposals	++	(S – L) P	D	
6	Air quality	The construction of new development proposed by the policy will have short term negative impacts on air quality due to generation of dust. The policy provides guidelines for density of development that is appropriate for the level of public transport accessibility site has. Large amounts of new development may have cumulative impacts on air quality.	++/-	(S – L) P T (S)	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Measures to mitigate effects of construction will be required.
7	Reduce Car Travel and improve Accessibility	The policy provides guidelines for density of development that is appropriate for the level of public transport accessibility site has.	++	(S – L) P	D	
8	Climate Change	New development will have to be designed to maximise energy conservation according to certain standards by this policy..	++	(S – L) P	D	
9	Mitigate Flood Risk	This policy does not refer specifically to dealing with Flood Risk which is dealt with in other policies in the Local Development Framework.	0			Add cross reference to flood risk policies in full version of policy in submission document.
10	Landscapes and Townscapes	These policy is designed to ensure that new development is compatible with and improves landscapes and townscapes.	++	(M – L) P	D	
11	Historic environment	Most of these sites do not possess any buildings of historic merit or interest (with the exception of Convoys Wharf and Arklow Road/Childers Street). They all fall within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains.	0/+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	This policy sets general parameters to ensure that new development is designed to appropriate amenity standards which will have an indirect positive effect on human health.	+	(S – L)	I	
14	Reduce poverty & exclusion	This policy is not relevant	0	0		
15	Education	This policy requires development to consider location in relation to facilities.	+	(S – L)	I	
16	Reduce crime	Areas of land in single uses that are not used at night such	++	(M – L) I	D/I	Security measures such as 24 hour

		as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.				caretaking and CCTV. Increase public transport provision
17	Community welfare	Not relevant to this policy	0	0		Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	
<b>Comment: This is an over-arching policy designed to indicate to the developer the basic design considerations that need to be taken into account when preparing development schemes. It does not include specific reference to all of the policies in the urban design chapter but requires developers to take account of them/</b>						

<b>HEC1 Size, nature and location</b>						
The size, nature and scale of health, education and community facilities should be considered so that they are suitably located within their catchment area. Leisure, Community, Arts, Cultural, Entertainment and Sports facilities should be located in appropriate places, such as regeneration areas, that both contribute to sustainability objectives and provide access for users.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Appropriate location of HEC facilities to large housing developments will make them more attractive as long term homes and hence assist in raising the land value and property prices in the borough	+	P S-L	I	The effect can be enhanced by providing local employment opportunities and improve shopping facilities
2	Employment	HEC facilities will increase employment opportunities in the building industry and running of the facilities	+	P S-L	D	Enhancement by promoting available jobs locally to increase local employment
<b>Environmental</b>						
3	Minimise waste	Demolition and construction waste will be generated. Operational waste will generate some waste	-	P S-L	D	Require development proposals to reduce and reuse materials where possible and use materials from sustainable sources
4	Water resources	Some facilities, such as swimming pools will increase water usage	-	P S-L	D	Mitigation by requiring grey water recycling in the developments
5	Biodiversity	Sports facilities may pave over land that can could be used as greenfields. Some facilities do however create more	+/-	P S-L	D	Mitigation and enhancement by using permeable surfaces for paved areas and introduce biodiversity where

		opportunities for biodiversity				feasible.
6	Air quality	Construction of facilities and people accessing facilities by vehicles will have a negative impact on air quality	-/+	P S-L	D	Mitigation via appropriate construction practices
7	Transport	Locating facilities close to developments will reduce the need to use motor vehicles to access the facilities	+	P S-L	D	Enhancement by incorporating green travel plans
8	Energy use and Climate Change	Construction and operational phase will require energy	-	P S-L	D	Require development proposals to reduce and reuse materials where possible and use materials from sustainable sources. Require high energy efficiency and renewable energy.
9	Flood risk	Hard surfaces can increase surface runoff which increases flood risk	-	P S-L	D	Where possible incorporate permeable surfaces and condense the size of the built form
10	Landscapes and Townscapes	New and improved facilities affect the townscapes as they can become landmarks and regenerate areas	+	P L	D	Ensure the design of the development is appropriate to the local environment
11	Historic environment		+/-	P L	D	Ensure the design of the development is appropriate to the local environment, particularly in or near conservation areas
<b>Social</b>						
12	Sufficient & decent housing	Accessible HEC facilities provide the basic infrastructure for housing that is sustainable	+	P S-L	D	
13	Human health	Positive impact as recreational facilities help improve people's health	++	P S-L	D	Ensure that sports and recreational facilities reflect people's needs and are available at a reasonable cost
14	Reduce poverty & exclusion	Accessible educational facilities help reduce poverty and exclusion	+	P S-L	D	Provide opportunities for a range of training and educational opportunities which reflects local needs
15	Education	Appropriate provision and location enhances use of educational facilities	++	P S-L	D	
16	Reduce crime	Accessible and high standard educational and recreational facilities may provide an incentive for young people to stay away from crime	+	P S-L	I	
17	Community welfare	HEC facilities provide essential infrastructure for a community and people's well being	++	P S-L	D	
18	Accessibility	The policy specifies locating facilities where they are needed	++	P S-L	D	

Comment: The policy shows some negative effects for environmental objectives caused by the construction and use of the facilities. The effects can be mitigated by sustainable construction practices. Significantly positive effects are found for the social objectives.

## HEC2 Redevelopment/Change of use of health, education community and leisure facilities

The Redevelopment/Change of use of health, education, community and leisure facilities will be permitted if it can be demonstrated that:

- (a) the facility can equally be replaced at an alternative site with an equal or improved level of accessibility; and
- (b) The facilities needs updating which cannot be achieved at a reasonable cost; or
- (c) a sound evidence base clearly indicates that the facility is no longer needed.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant effect				
2	Employment	No significant effect				
<b>Environmental</b>						
3	Minimise waste	No significant effect				
4	Water resources	No significant effect				
5	Biodiversity	No significant effect				
6	Air quality	No significant effect				
7	Transport	No significant effect				
8	Energy use and Climate Change	No significant effect				
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	No significant effect				
11	Historic environment	No significant effect				
<b>Social</b>						
12	Sufficient & decent housing	No significant effect				
13	Human health	Policy protects health facilities in existing locations	++	P M-L	D	
14	Reduce poverty & exclusion	No significant effect				
15	Education	Policy ensures that HEC facilities are not removed if there is an identified need	++	P M-L	D	
16	Reduce crime	No significant effect				
17	Community welfare	Policy protects HEC facilities that benefit the community welfare	++	P M-L	D	
18	Accessibility	Policy ensures that HEC facilities will be equally or more accessible	+	P M-L	D	

Comment: The policy protects HEC facilities from redevelopment or change of use, which benefits the local community by ensuring that their needs are met

### HEC3 Social and economic impact assessment

Major development proposals will be required to submit a social and economic impact assessment. Where a need for improved or additional health, education or community facilities is identified, planning obligations and conditions on planning permissions may be applied to ensure adequate provision.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	An impact assessment will identify gaps and areas of concern which will ensure that developments provide the basic social infrastructure for a community to thrive	+	S-L	D	
2	Employment	The policy will help identify gaps in the employment market	+	S-L	D	
<b>Environmental</b>						
3	Minimise waste	No significant effect				
4	Water resources	No significant effect				
5	Biodiversity	No significant effect				
6	Air quality	No significant effect				
7	Transport	No significant effect				
8	Energy use and Climate Change	No significant effect				
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	No significant effect				
11	Historic environment	No significant effect				
<b>Social</b>						
12	Sufficient & decent housing	No significant effect				
13	Human health	The policy will help identify gaps in the provision of healthcare services	++	S-L	I	Ensure that the gaps identified are addressed
14	Reduce poverty & exclusion	The policy will help identify needs of the local community and provide funds via s106 agreements	+	S-L	I	Ensure that the gaps identified are addressed
15	Education	The policy will help identify gaps in the provision of educational facilities and provide funds via s106 agreements	++	S-L	I	Ensure that the gaps identified are addressed
16	Reduce crime	The impact assessments will help identify gaps and needs of the local community which can aid crime reduction	+	M-L	I	Ensure that the gaps identified are addressed
17	Community welfare	The impact assessment will help identify gaps in the needs of the social infrastructure	++	S-L	I	Ensure that the gaps identified are addressed

18	Accessibility	The impact assessment will help identify gaps in the needs of the social infrastructure	+	S-L	I	Ensure that the gaps identified are addressed
Comment:						

<b>HEC4 Provision of leisure Facilities</b>						
Within the Major and District Centres, but outside the Core Shopping Areas, the Council will encourage the provision of new, and retention of existing, recreational and leisure facilities including facilities for arts, culture and entertainment, as part of any appropriate major redevelopment in the Town Centres.						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Leisure and recreational facilities will enhance the use of the town centre as a destination and hence provide economic growth	+	P	D	
2	Employment	Leisure and recreational facilities will provide employment opportunities	+	P	D	
<b>Environmental</b>						
3	Minimise waste	Waste will be generated in the demolition and construction phase and the running of the facilities	-	T	D	Ensure waste management plans are implemented
4	Water resources	Water will be used during construction and the operation of facilities	-	T	D	Seek to reduce water consumption where possible
5	Biodiversity	No significant effect				
6	Air quality	These facilities will generate more traffic. However some of this will be offset by being located in a central location close to public transport facilities	0/-	T	D	Require green travel plans
7	Transport	These facilities will generate more traffic. This will however be offset by being located in a central location close to public transport facilities	0	T	D	Require green travel plans
8	Energy use and Climate Change	These facilities will require energy in the construction and operational phase	-	P	D	Mitigation is to ensure energy efficient design and use of renewable technologies
9	Flood risk	No significant effect				
10	Landscapes and Townscapes	No significant effect				
11	Historic environment	No significant effect				
<b>Social</b>						
12	Sufficient & decent	No significant effect				

	housing					
13	Human health	The provision of recreational and health facilities can add to people's sense of wellbeing	+	P	D	
14	Reduce poverty & exclusion	The provision of accessible recreational and health facilities can add to people's sense of wellbeing	+	P	D	
15	Education	No significant effect				
16	Reduce crime	No significant effect				
17	Community welfare	The provision of accessible recreational and health facilities can add to people's sense of wellbeing	+	P	D	
18	Accessibility					
Comment: The policy will encourage recreational facilities are located in town centres which are central locations with good public transport facilities						

#### HEC5 Places of worship

Applications for places of worship will be granted permission provided the following have been taken into consideration:

- a) Adequate parking provision
- b) Traffic generation
- c) Noise generation
- d) Impact on neighbours
- e) Hours of operation
- f) Opportunity loss of other uses

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant impact				
2	Employment	No significant impact				
<b>Environmental</b>						
3	Minimise waste	No significant impact				
4	Water resources	No significant impact				
5	Biodiversity	No significant impact				
6	Air quality	The policy will ensure that traffic generation is reduced	+	P S-L	D	
7	Transport	The policy will ensure that traffic generation is reduced and that adequate parking facilities are provided	+	P S-L	D	
8	Energy use and	No significant impact				

	Climate Change					
9	Flood risk	No significant impact				
10	Landscapes and Townscapes	No significant impact				
11	Historic environment	No significant impact				
<b>Social</b>						
12	Sufficient & decent housing	No significant impact				
13	Human health	The policy will ensure that any impact from noise and traffic is reduced	+	P S-L	D	
14	Reduce poverty & exclusion	No significant impact				
15	Education	No significant impact				
16	Reduce crime	No significant impact				
17	Community welfare	The policy ensures appropriate location of places of worship	+	P S-L	D	
18	Accessibility	No significant impact				
Comment:						

#### HEC6 Temporary school buildings

The Council will grant planning permission for temporary schools buildings provided that the following criteria have been taken into consideration:

- (a) There is no adverse impact on the amenity of the surrounding neighbourhood;
- (b) The proposed site is vacant or the existing use can be satisfactorily relocated; and
- (c) The proposed use is not on an open space.

No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	No significant impact				
2	Employment	No significant impact				
<b>Environmental</b>						
3	Minimise waste	No significant impact				
4	Water resources	No significant impact				
5	Biodiversity	The policy protects open space from being used for temporary school buildings	+	P S-L	D	
6	Air quality	No significant impact				
7	Transport	No significant impact				
8	Energy use and Climate Change	No significant impact				
9	Flood risk	No significant impact				

10	Landscapes and Townscapes	The policy will protect the townscape	+	P S-L	D	
11	Historic environment	No significant impact				
<b>Social</b>						
12	Sufficient & decent housing	No significant impact				
13	Human health	No significant impact				
14	Reduce poverty & exclusion	No significant impact				
15	Education	Temporary school buildings are essential as an interim measure during construction of new facilities	+	P S-L	D	
16	Reduce crime	No significant impact				
17	Community welfare	No significant impact				
18	Accessibility	No significant impact				
Comment: The policy shows benefits as it protects for education and biodiversity						

FOR CONSULTATION

### E1 Surrey Canal Strategic Employment Location

The Council will grant permission for B1 (b), B1(c), B8 and where appropriate B2 uses within the Surrey Canal Strategic Employment Location as defined on the Proposals Map. The Council will grant permission for uses with Class B1(a) when these uses are ancillary to light industrial, general industrial or warehousing uses.

Permission for other uses will only be granted in the following circumstances:

- (a) Uses considered to enhance the business and industrial functioning of the area
- (b) Uses considered ancillary to the business and industrial functioning of the area.

New developments that will intensify the business and industrial functioning of the area, which are appropriate to this location and do not conflict with other relevant policies in this plan will be welcomed.

Residential developments will not be granted planning permission in Strategic Employment Locations as they are considered to have an adverse impact on the continuing industrial functioning of these areas.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, waste, and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. These include printing firms, business services firms, and food manufacturing premises. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	The protection of the Strategic Employment Location will ensure that there are sufficient sites to handle the borough's waste,	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage

		thereby leading to an increase in waste recovery and recycling as a direct effect. Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than there redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry.				disposal of waste according to the waste hierarchy.
4	Water resources	The retention of these sites in employment uses will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Industrial processes often uses large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough	-	(S - L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The Surrey Canal Strategic Employment Location which is a major concentration of business and industrial activity is very poorly served by public transport.	+/-	(S - L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The Surrey Canal Strategic Employment Location which is a major concentration of business and industrial activity is very poorly served by public transport.	+/-	(S - L) P	D/I	Increase public transport provision to Surrey Canal Strategic Employment Location. Promote completion of East London Railway.
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will	+/-	(S - L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.

		have a beneficial effect by reducing the amount of energy required to transport goods.				
9	Mitigate Flood Risk	Much of the Surrey Canal Strategic Employment Location is within Zone 3 (High probability) Flood Risk Area of the Borough. Most of these sites have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses in the Location are defined as being of low vulnerability in PPS 25.	--	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.
10	Landscapes and Townscapes	The retention of these sites will not have a positive effect on the landscapes and townscapes of the borough. Most of the sites comprise of industrial sheds of relatively low urban design quality (with some exceptions) and large areas of hard surfacing.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape in the Surrey Canal Strategic Employment Location.
11	Historic Environment	The sites within the Surrey Canal Strategic Employment Location are in an Area of Archaeological Priority as defined by English Heritage (Greater London Archaeological Service). This means that redevelopment in these areas that might reveal remains of interest will require an assessment and preservation in accordance with central government legislation and a UDP policy. This policy does not necessarily promote redevelopment on these sites, but on the other hand relocation of waste uses and the associated environmental mitigation might mean that there might be extensive land works that require archaeological assessment.	-	(L) P	D	Legislation requires archaeological assessment and appropriate remediation investigation and preservation.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other

						sites are being made available in the Borough, particularly in the northern half which is lacking in facilities for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this locations will help reduce poverty and exclusion for some local people.	+	(L) P?	I	
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy. A proposal from a community group to build a school on one of the Defined Employment Areas was not carried forward as a Preferred Option.	-	(S – L) P	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses such as waste transfer and processing will not directly improve accessibility to key local facilities.	-	(S – L) P	I	

**Comment:** The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London will not be able to function without a certain amount of London given over to waste management and warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected. Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Strategic Employment Location will be redeveloped to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.

### E2 Surrey Canal Strategic Sites for Waste Uses, New Waste Uses and Relocation of Waste Uses

Existing waste processing and transfer sites in the Surrey Canal Strategic Employment Locations are considered suitable for continuation in these uses and planning permission will not be granted for changes of use. The preferred location for new and relocated waste transfer and processing uses will be the Surrey Canal Strategic Employment Location subject to meeting the appropriate environmental constraints for these uses as set out in Policy WASTE ?

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of locations for waste processing. The contribution to economic growth will depend on the future of the waste processing industry and the nature of the processes that might be undertaken on these sites.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. New waste uses in this location will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	The protection of the Strategic Employment Location will ensure that there are sufficient sites to handle the borough's waste, thereby leading to an increase in waste recovery and recycling as a direct effect.	++	(S – L) P	D	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	New waste disposal uses are likely to increase water use and involve amounts of hard surfacing and increasing water run off.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be

						encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough	-	(S – L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites, and new waste development would be required to have mitigation measures which would include landscaping involving the introduction of green elements and native species.
6	Air quality	Provision of local waste sites will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, may have local effects on air quality. The Surrey Canal Strategic Employment Location which is a major concentration of business and industrial activity is poorly served by public transport. Some waste management uses generate dust and other emissions.	+/-	(S – L) P	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of waste sites will improve air quality overall in that travel to waste sites will be reduced. The Surrey Canal Strategic Employment Location which is however very poorly served by public transport.	+/-	(S – L) P	D/I	Increase public transport provision to Surrey Canal Strategic Employment Location. Promote completion of East London Railway.
8	Climate change	Waste re-manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing these services locally will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S – L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate Flood Risk	The Surrey Canal Strategic Employment Location is within the Zone 3 Flood Risk Area (High probability). Many of these sites have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. New waste sites will also involve areas of hard standing particularly on Silwood Triangle.	--	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems, and other flood mitigation measures.
10	Landscapes and Townscapes	The retention of these sites will not have a positive effect on the landscapes and	--	(S – L) P	D	Provide attractive landscaping and screening for these sites to improve

		townscapes of the borough. Most of the sites comprise of industrial sheds of relatively low urban design quality (with some exceptions) with large areas of hard surfacing.				the overall quality of the streetscape in the Surrey Canal Strategic Employment Location. The SEL itself is located in an area of the borough that is located behind railway lines where these uses have the least adverse impact
11	Historic environment	The sites within the Surrey Canal Strategic Employment Location are in an Area of Archaeological Priority as defined by English Heritage (Greater London Archaeological Service). This means that redevelopment in these areas that might reveal remains of interest will require an assessment and preservation in accordance with central government legislation and a UDP policy. This policy does not necessarily promote redevelopment on these sites, but on the other hand relocation of waste uses and the associated environmental mitigation might mean that there might be extensive land works that require archaeological assessment.	-	(L) P	D	Policies require archaeological assessment and appropriate remediation investigation and preservation.
<b>Social</b>						
12	Sufficient & decent housing	Protecting waste sites will have the effect of removing the possibility of using these sites for housing development. The location of waste processing sites will need careful consideration	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting waste sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	This policy relates to a core of industrial sites suitable for various commercial uses, and also waste processing that do not require a high quality environment. Other sites are being made available in the Borough, particularly in the northern half which is lacking in facilities for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this locations	+	(L) P?	I	Ensure that training is available to enable local people to access jobs in these areas.

		will help reduce poverty and exclusion for some local people.				
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L) P	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses such as waste transfer and processing will not directly improve accessibility to key local facilities.	-	(S – L) P	I	Development on other sites in the borough will contribute to meeting these needs.

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the need for waste transfer and recycling facilities by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that waste sites situated locally should have an effect in reducing traffic movements. London will not be able to function without a certain amount of London given over to waste management processes so in terms of overall sustainability objectives these sites need to be protected.**

**Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that many of these sites within the Strategic Employment Location will be redeveloped to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of these sites**

will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.

### E3 Bromley Road Strategic Employment Location

The Council will continue to support the important utility uses, and industrial/ warehouse units in this area by refusing planning permission not within the B Use Class. The Council will consider favourably:

- (a) new or intensified public infrastructure developments;
- (b) extension to the bus garage; and
- (b) B1/ B8 uses and where appropriate B2 industrial or warehousing units.

The Council will support the removal of residential uses within the Strategic Employment Location and its replacement by developments within the B Use Class. Applications for changes of use within shop units on the local parade will be dealt with by the relevant shopping parade policy, although applications to change the use of any shop to residential will be resisted as these uses are considered to impact on the continued industrial functioning of the area.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, public utility and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.

		buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry				
4	Water resources	The retention of these sites in employment use will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S - L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The provision of a public utility, in this case a bus garage will be beneficial in reducing the amount buses need to travel to get to their route starting points. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S - L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The Bromley Road SEL is relatively well served by public transport.	++	(S - L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. The provision of a public utility (in this case a bus garage) will have the effect of reducing greenhouse gas emissions by enabling shorter bus journeys overall.	+/-	(S - L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate Flood Risk	The Bromley Road Strategic Employment Locations is within the Zone 3 (High probability) Flood Risk Area of the Borough. Most of the sites in this location	--	(S - L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.

		have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses are considered to fall into the 'less vulnerable' category of uses.				
10	Landscapes and Townscapes	The buildings in the Bromley Road SEL are of varying quality . The retention of these sites will not have a positive effect on the landscapes and townscapes of the borough. The area is opposite the Culverley Green Conservation area on the east side of the A21.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape. The boundary of the adjacent Conservation Area crosses within the SEL and provides a landscaped buffer zone to protect the Conservation Area which should be retained.
11	Historic Environments	None of the buildings within the SEL have been identified as of merit. The site is not within an Area of Archaeological Priority. The site is opposite a Conservation area (see above).	-	(L) P	D	The boundary of the adjacent Conservation Area crosses within the SEL and provides a landscaped buffer zone to protect the Conservation Area which should be retained.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L) P	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L) P	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not	--	(S – L) I	D/I	Security measures for individual

		used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.				estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: : The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London will not be able to function without a certain amount of land given over to warehousing and industrial processes, and sites available for public utility operations so in terms of overall sustainability objectives these sites need to be protected. Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Strategic Employment Location will be redeveloped to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of the these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.**

#### **E4 General Policy: Local Employment Locations**

The Council will seek to protect business and industrial uses in the Local Employment Locations. Permission will be granted for uses falling within the B Use Class for these sites. Specific guidance as to the which category of B Use Class is acceptable for individual areas can be found in the area specific policies below. Proposals to intensify the business uses in these areas will be welcome provided this does not harm the amenity of any adjacent uses that might be sensitive to noise or pollution creating activities.

Permission for residential development will not be granted as it is considered that this will affect the continuing industrial functioning of the area.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, public utility and business uses and services, essential to the local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of these locations will ensure a supply of local job opportunities and add variety to the types of jobs available.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry.	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The retention of these sites in employment uses will mean that hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S – L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.

6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The provision of a public utility, in this case a bus garage will be beneficial in reducing the amount buses need to travel to get to their route starting points. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S – L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel.	++	(S – L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S – L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate Flood Risk	Most of the sites in this policy allocation have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses are considered to fall into the 'less vulnerable to flood risk' category of uses. Two of these areas are in Zone 3 (High probability). This will be discussed below in relation to the specific areas.	--	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.
10	Landscapes and Townscapes	Most of these sites comprise standard industrial warehousing units that are relatively modern. They do not make a positive contribution to the architectural quality or streetscape.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape.
11	Historic environment	Two of the areas are Areas of Archaeological priority. Redevelopment might necessitate investigation and preservation of historic remains.	0	(L) P	D	Ensure policies on areas of Archaeological priority are followed.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision

						targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L) P	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing an other related uses will not directly improve accessibility to key local facilities.	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This**

policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected. Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of the these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.

### E5 Plough Way Local Employment Location

The Council will grant permission for uses within the B1, B8 and where appropriate B2 Use Class for this site. Proposals to intensify or diversify the office uses on Marine Wharf will be welcomed.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a locations for functions such as warehousing, storage, and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, providing a variety of premises, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.

		buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry.				
4	Water resources	The retention of this area in employment use will mean that hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S - L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The provision of a public utility, in this case a bus garage will be beneficial in reducing the amount buses need to travel to get to their route starting points. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S - L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The Bromley Road SEL is relatively well served by public transport (both by bus and by train).	++	(S - L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S - L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	The two sites in this area have large areas of hard-standing which causes water run off. The uses are considered to fall into the 'less vulnerable to flood risk' category of uses. This area is in Flood Risk Zone 3 (High probability).	--	(S - L) P	D	Encourage introduction of more green elements and living, and sustainable urban drainage systems.

10	Landscapes and townscapes	This site is in two main uses. The buildings are of a modern, relatively attractive standard.	-	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape.
11	Historic environment	None of the buildings within this area are of historical merit. This area is in an area of archaeological priority which might necessitate archaeological investigation/preservation of remains in the case of redevelopment. The adjacent built development is modern.		(L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The business uses at this location are secured gated sites with walls that present a blank frontage to the street.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land. The blank walled face to the street is compensated for by residential uses across the street providing a degree of passive surveillance.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require

						a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected.**

**Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.**

#### E6 Evelyn Street Local Employment Location

The Council will grant permission for uses within the B1, B8 and where appropriate B2 Use Class for this site. Proposals to intensify or diversify the uses on this site will be welcomed.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, waste, and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. These include printing firms, business services firms, and food	++	(S – L) P	D	

		manufacturing premises. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.				
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The retention of these sites in employment uses will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S – L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The provision of a public utility, in this case a bus garage will be beneficial in reducing the amount buses need to travel to get to their route starting points. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S – L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.

7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The Bromley Road SEL is relatively well served by public transport.	++	(S – L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S – L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	This site has large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses are considered to fall into the 'less vulnerable to flood risk' category of uses. The area is in Flood Risk Zone 3 (High probability).	--	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.
10	Landscapes and Townscapes	These sites comprise standard industrial warehousing units that are relatively modern. They do not make a positive contribution to the architectural quality or streetscape.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape.
11	Historic environment	None of the buildings within the areas are of historical merit. The area is in an area of archaeological priority(see above). The adjacent built development is largely modern.	-	(L) P	D	Ensure that policies on the Area of Archaeological Priority are followed.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build	-	(S – L) P	I	The Boroughs schools programme

		schools on any of these sites, and school uses would be restricted by the policy.				does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected.**

**Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of the these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the**

**provision of housing sites elsewhere to meet targets.**

**E7 Creekside Local Employment Location**

The Council will support the continuation of creative industries in the Creekside Local Employment Location. Applications for small business units and managed workspaces in this area within the B Use Classes will be welcomed.

Development should improve the structure, environmental quality and appearance of the Creek walls and take account of the Environment Agency's requirements for building near flood defences.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, business uses and services, and particularly in this location creative industry uses essential to the local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels. The creative businesses although often very small have some potential to provide some variety of job opportunity for local people.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.

		their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry				
4	Water resources	The retention of these in employment uses sites will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not generally improve biodiversity or open space provision in the Borough. However the Black Redstart which is on the amber list of Birds of Conservation Concern which breed in industrial locations in Deptford.	-	(S - L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites. Encourage physical habitats for Black Redstarts.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S - L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Energy	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. This area is well served by public transport (bus routes, DLR and over ground rail close by).	++	(S - L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S - L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	Most of the sites in this policy allocation have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses are considered to fall into the 'less vulnerable to flood risk' category of uses. The area falls into Flood Risk Zone 3 (High probability).	--	(S - L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.

10	Landscapes and Townscapes	The buildings in this area are older in character. Some of them retain the character of the older Creekside industrial areas including Harold Wharf (Arts in Perpetuity Trust), the Faircharm Estate. As such they are considered to perform a positive function in the local streetscape.	++	(S – L) P	D	Enhance local streetscape to reflect character of the buildings.
11	Historic environment	Some of the buildings on this location represent older buildings that contribute to the character on Creekside as an older industrial area with a long history of occupation by various industries.	++	(L) P	D	Consider local listing of some buildings. Enhance the streetscape of Creekside to reflect its historical industrial character
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L) P	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Some sites in this location present a blank walled face to the street, but this is less marked than in the more modern industrial estates. The presence of creative industries in the area is likely to increase the number of casual visitors to the area and therefore increase feelings of safety.	--	(S – L) I	D/I	Security measures such as 24 hour caretaking and CCTV.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other

						sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses will not directly improve accessibility to key local facilities.	-/+	(S – L) P	I	

**Comment:** The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected. Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of the these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.

### E8 Endwell Road Local Employment Location

The Council will grant permission for B1 (a) uses in this area and will welcome new developments that intensify this use.

New developments will need to take account of the adjacent Conservation Area and not cause any adverse impact.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, waste, and business uses and services, essential to the local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. These include printing firms, business services firms, and food manufacturing premises. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and	++	(S – L) P	D	

		retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.				
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs locally available. Areas of the borough with historically high unemployment levels are close by.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The retention of these sites in employment uses will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	-	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S – L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S – L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. This estate is well served by public transport with an overground rail station and bus routes close by.	++	(S – L) P	D/I	
8	Climate change	Manufacturing processes will increase	+/-	(S – L) P	D	Installation of energy efficiency

		emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.				measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	This site has large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. It is in Zone 1 (low flood risk)..	-	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.
10	Landscapes and Townscapes	This site comprises small purpose built units in a business centre, and open scaffolding yards. It is relatively well hidden from the surrounding roads with very little road frontage, although it is visible from the rear of residential properties and the boundary of a conservation area crosses the rear of the site.	-	(S – L) P	D	Redevelop scaffolding yard to provide more attractive business units.
11	Historic environment	None of the buildings within the this area are of historical merit. It is adjacent to a Conservation Areas	-	(L) P	D	The boundary of the adjacent Conservation crosses within location. Redevelopment of the scaffolding yard would improve the adjacent conservation area.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L)	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate

						locations to meet needs for school places..
16	Reduce crime	This is a self contained area with a small street frontage. The impact on the street scene in terms of lack of passive surveillance is fairly minimal. There is security on site.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to site suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected. Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of the these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.**

### **E9 Blackheath Hill, Clyde Vale/Perry Vale, Lewisham Way, Manor Lane, Stanton Square, Willow Way, Worsley Bridge Road Local Employment Locations**

The Council will approve new developments which increase the intensity of the current uses in these areas. Permission for non B Use Classes, that do not support the continued industrial/commercial functioning of these areas will be refused.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of	++	(S – L) P	D	

		employment locations for functions such as warehousing, storage, and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. These include printing firms, business services firms, and food manufacturing premises. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.				
2	Employment	Similar comments apply to the above. The retention of this locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry	+/-	(S – L) P	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The retention of these sites in employment uses will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S – L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However	+/-	(S – L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate

		local deliveries and traffic movements, and industrial activities may have local effects on air quality.				environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. All the sites are close to good public transport (bus and overground rail).	++	(S – L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S – L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	Most of the sites in this policy allocation have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. The uses are considered to fall into the 'less vulnerable to flood risk' category of uses. The areas are in Zone 1 (low) Flood Risk.	--	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.
10	Landscapes and Townscapes	Most of these sites comprise standard industrial warehousing units that are relatively modern. They do not make a positive contribution to the architectural quality or streetscape.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape.
11	Historic environment	None of the buildings within these areas are of historical merit. One area is in an area of archaeological priority (see above).	-	(L) P	D	The boundary of the adjacent Conservation crosses within the SEL and provides a landscaped buffer zone to protect the Conservation Area which should be retained.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L) P	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The	+	(L) P?	I	Ensure that training is available to enable local people to access jobs

		provision of local jobs within this location will help reduce poverty and exclusion for some local people.				available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. The common building form is often window free, and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses and processing will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so**

in terms of overall sustainability objectives these sites need to be protected.

Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.

### E10 Malham Road Local Employment Location

Except in cases of replacement of existing residential development and shop premises, the Council will refuse applications for development that do not fall within the B Use Class order.

Proposals to intensify uses within the B Use Class order will be welcomed provided they do not harm surrounding residential areas. Applications for changes of use of the shop premises will be dealt with by the relevant local shopping parade policy.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will have a positive effect on economic growth by protecting a set of employment locations for functions such as warehousing, storage, and business uses and services, essential to the strategic and local functioning of the economy that do not require high quality locations in Town Centres, in order to function at an optimum level. These include printing firms, business services firms, and food manufacturing premises. It will contribute to sustainable growth by ensuring that a set of these locations are available locally, and retaining vitality and viability within the local economy thereby reducing the need to travel or out-commute.	++	(S – L) P	D	
2	Employment	Similar comments apply to the above. The retention of these locations will ensure a supply of local job opportunities and add variety to the types of jobs available, in an area of the borough with historically high unemployment levels.	++	(S – L) P	D	Ensure that measures are in place to train local residents to be able to obtain jobs in the location.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect.	+/-	(S – L) P	D/I	Businesses can be encouraged to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.

		The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry.				
4	Water resources	The retention of these sites in employment uses will mean that their hard surfaced servicing areas will be retained, and there will be fewer opportunities to install SUDs. Some Industrial processes use large amounts of water.	--	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas.
5	Biodiversity	This policy will not improve biodiversity or open space provision in the Borough.	-	(S - L) P	I	The encouragement of Living Roof Installation might improve biodiversity on these sites.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The provision of a public utility, in this case a bus garage will be beneficial in reducing the amount buses need to travel to get to their route starting points. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S - L) P	D/I	increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. This area is close to good public transport (buses and overground rail).	++	(S - L) P	D/I	
8	Climate change	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	+/-	(S - L) P	D	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	Most of the sites in this area have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk. uses. The location is within Zone 1 (low) Flood Risk .	--	(S - L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.

10	Landscapes and Townscapes	Most of these sites comprise standard industrial warehousing units that are relatively modern. They do not make a positive contribution to the architectural quality or streetscape/.	--	(S – L) P	D	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape.
11	Historic environment	None of the buildings within the these areas are of historical merit. One area is in an area of archaeological priority(see above).	-	(L) P	D	The boundary of the adjacent Conservation crosses within the SEL and provides a landscaped buffer zone to protect the Conservation Area which should be retained.
<b>Social</b>						
12	Sufficient & decent housing	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	--	(S – L) P	D	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets.
13	Human health	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	-	(S – L) P	I	The Council is proposing to adopt policies that are more flexible in allowing for these health facilities elsewhere.
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of local jobs within this location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these sites, and school uses would be restricted by the policy.	-	(S – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places..
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night.	--	(S – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV.
17	Community welfare	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	-	(S – L) P	I	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough for mixed use development which represent opportunities to provide the core of more cohesive

						communities with the facilities to match.
18	Accessibility	This policy which restricts uses on these sites to offices, industry, warehousing and other related uses and processing will not directly improve accessibility to key local facilities. However the public utilities on this site will improve access to local transport by enabling local bus routes to operate	-/+	(S – L) P	I	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has negative effects recorded against a large number of social and environmental objectives. The main positive benefits are to be found in respect of economic growth and employment, and objectives connected with the fact that industrial sites situated locally should have an effect in reducing traffic movements. London, and the economy locally will not be able to function without a certain amount of land given over to warehousing and industrial processes so in terms of overall sustainability objectives these sites need to be protected.**

**Many of the negative environmental effects could be mitigated by various measures such as use of green roofs, sustainable urban drainage techniques, and energy saving buildings. However it is not expected that these sites within the Local Employment Locations will be redeveloped in the lifetime of the plan to provide new higher building and landscaping standards so opportunities for this sort of improvement will probably be rather limited. This will mean that the location of these sites will be significant in minimising any environmental impacts. Negative effects on housing provision can be mitigated by ensuring the provision of housing sites elsewhere to meet targets.**

### E11 Mixed Use Employment Locations

The Council will encourage development that maximises the employment contribution from these sites in the form of mixed use developments that meet the following criteria:

- (a) provision of a comprehensive redevelopment of the designated mixed use employment area;
- (b) an increase in the number of jobs provided by the site;
- (c) include a proportion of on-site affordable housing;
- (d) improves the environmental quality of the area;
- (e) and improves connections to the rest of the borough including the improvement of existing or provision of new pedestrian routes to public transport services and local facilities.

The development should also;

- (f) provide small business units for starter business such as managed workspace
- (e) contribute to a raising the architectural quality of the area
- (f) improve the social and leisure amenities of the area.

#### Implementation

The Council will require a master plan to be submitted with applications for planning permission to ensure a comprehensive development of each mixed use employment area, and will consider using Compulsory Purchase powers to ensure a comprehensive redevelopment of each mixed use employment location.

The Council will enter into Section 106 agreements with developers to implement policy CSE 16. Applications will be supported by a financial appraisal which will establish the proportion of affordable housing to be provided on and area of employment floorspace taking into account any off-site infrastructure requirements necessitated by the development.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy is intended to boost the economy by the redevelopment of a number of large sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. The introduction of a significant increase in the population over a number of these sites will have an indirect effect of increasing demand for goods and services locally, and thereby benefit local economic growth.	++	(M - L) P	D/I	Ensure that sufficient and varied premises are provided in order to attract a wide variety of businesses.
2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. Once the proposals in the policies are taken up there will be significant number of short term construction jobs generated by the extensive building works required.	++	(M - L) P (S - L) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on construction waste. New residential development will generate increased amounts of waste.	--	(S - L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy. Encourage residential occupants to recycle and to reduce the amount of packaging by the choice of goods purchased.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species.	++	(S - L) P	D	
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The construction of developments proposed by the policy will have short term negative impacts on air quality due to	+/-	(S - L) P T (S)	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Measure to mitigate effects of

		generation of dust.				construction will be required,.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this development.	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zone 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments.
10	Landscapes and Townscapes	These sites are generally have a poor environmental quality, and have a negative effect on landscapes. Some locations and uses are prominent and have a very negative effect. Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved.	++	(M – L) P	D	
11	Historic environment	Most of these sites do not possess any buildings of historic merit or interest (with the exception of Convoys Wharf and Arklow Road/Childers Street). They all fall within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains.	0/+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.

15	Education	There are no Council proposals to build schools on any of these sites. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as positive, as are those for the social indicators particularly for the provision of housing. Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density. The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough. The cumulative effect of a redevelopment of a significant number of these sites will be very significant over all the sustainability objectives.**

#### **E12 Arklow Road/Childers Street**

New developments considered suitable on this site will be a combination of the following uses:

- (a) Intensifications of uses within the B1 (a) B1 (c) Use Class
- (b) Creative industries which could take advantage of the format of some of the existing buildings
- (c) New small business units
- (d) Residential use

The Council will require a comprehensive approach to the development of this site based on a Masterplan. Existing buildings in the Arklow Road and Childers Street areas are considered to be capable of re-use and refurbishment and applications for their redevelopment will need to demonstrate that such a comprehensive approach will deliver significant benefits beyond their retention including working with the Council on a strategy for re-accommodating the existing businesses in the completed development or elsewhere.

Development will need to take measures to reduce the severance caused by the railway lines traversing the site by the use of imaginative design solutions, and provide through routes to enable the linking of the site to the wider area. This will require negotiation with Network Rail and Spacia (or their successors) to ensure the appropriate handling of the business/warehousing units in the railway arches, and their continued functioning in business/industrial/warehousing use.

Employment uses should provide accommodation for creative uses and new small business units. Any new development should maximise the employment contribution on the site. Any proposed live/work developments on this site would need to be considered on their merits and demonstrate that appropriate design and management measures have been undertaken to ensure their continuance in business use.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy is intended to boost the economy by the redevelopment of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. However this site is in use by various firms that make a contribution to the local economy and with some investment the buildings are capable of being reused.	?	(M - L) P	D	Ensure that firms displaced by the development are enabled to be relocated within the borough. Ensure that the new development makes a significant contribution to the local economy.
2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. The site currently provides local employment with a variety of jobs requiring a range of skills from manual to high tech. See comments above. Should the site be redeveloped there will be a number of short term construction jobs generated.	?	(M - L) P (S - M) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements. Ensure the new development provides an appropriate variety of jobs and replaces them in numbers. Ensure that the firms that may be displaced by development are relocated in the borough.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on construction waste. Residential uses will generate an increased amount of waste.	--	(S - L) P/T	D/I	Businesses can be encouraged to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy. Encourage residents to recycle and reduce the amount of waste by the choice of goods consumed.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of	++	(S - L) P	D	

		native species.				
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The introduction of new dwellings may increase local car journeys. The construction of the development proposed by the policy will have short term negative impacts on air quality due to generation of dust.	+/-	(S – L) P T (S)	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed. Provision of new dwellings will increase local car journeys.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this development.	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	This Area is located in Flood Risk Area Zones 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as a 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments in particular for the more vulnerable uses proposed for this site..
10	Landscapes and Townscapes	Part of this site is located behind railway lines and viaducts in a self contained industrial estate. As such it has a minimal impact on the street scene. The other part of the site on Childers Street has buildings that provide a positive element to the street scene. If removed the new development would need to provide buildings of some character and quality to replace those lost. New development is proposed to improve permeability, new routes through the site and a high quality design. New uses would introduce an increasing variety to the townscape and improve landscaping.	++/-	(M – L) P	D	Reuse buildings on Childers Street. Ensure new development is of high quality and makes a positive contribution to the urban quality of this location.
11	Historic environment	The buildings on Childers Street have some historic interest as they are former railways maintenance sheds, and are still capable of refurbishment for commercial use.	-/+	(M – L) P	D	Refurbishment of Childers Street buildings would contribute to the built environment at this location.

		They are not however locally listed. The area is within an Area of Archaeological Priority. Redevelopment would lead to investigation/preservation of archaeological remains.				
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets.	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term.	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, an increase in permeability, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual buildings such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport an to increase their integration with the surrounding development.	++	(M – L) P	D	
<p><b>Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the</b></p>						

redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as invariably positive, as are those for the social indicators particularly for the provision of housing. . Effects on the economy and on job provision are positive. There are concerns with this site that the current uses provide local jobs and an extensive contribution to the local economy. This has been allowed for in the policy to ensure that any replacement development would achieve the aims of relocating existing uses and that the benefits arising would outweigh any disadvantage from the redevelopment. The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.

### E13 Oxestalls Road Mixed Use Employment Location

The Council will require a comprehensive approach to redevelopment to provide on this site:

- (a) a mixed use development that increases the employment generating capacity of the site;
- (b) small business units in the B1 (a) B1 (c) Use Class and small B8 storage facilities;
- (c) an element of residential development including affordable housing;
- (d) community facility;
- (e) an element of retail space to serve the needs of the development;
- (f) re-opening or re-use of the former Surrey Canal (subject to a feasibility study) in order to provide a high quality public space;
- (g) an increase in access and permeability;

Redevelopment will also need to deal appropriately with the access constraints provided by the bridge over the former Surrey Canal at the junction of Dragoon Road and Evelyn Street.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy is intended to boost the economy by the redevelopment of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. Some uses such as scrap metal recycling at this particular location might act as a positive deterrent to reinvestment in economically viable uses on this large significant site.	++	(M - L) P	D	Ensure that sufficient and varied premises are provided in order to attract a wide variety of businesses.
2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. Construction of new development will generate a number of short term construction jobs.	++	(M - L) P (M - L) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have	--	(S - L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy. Encourage

		short term negative effects on construction waste. Loss of a scrap metal recycling firm would need to be taken account of. New residential development will increase the amount of waste generated.				recycling amongst residential occupiers, and reduce packaging by choice of goods.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species. Redevelopment will also present an opportunity to reopen the former Surrey Canal and create an entirely new water habitat.	++	(S - L) P	D	
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. New dwellings may increase the number of car journeys made locally. The construction of the development proposed by the policy will have short term negative impacts on air quality due to generation of dust.	+/-	(S - L) P (S) T	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Code of practice to minimise disruption etc caused by construction.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed.	+/-	(S - L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this development.	+/-	(S - L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zone 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More	-/+	(S - L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments especially for those uses proposed

		vulnerable' will be built on site.				for the site classified as 'more vulnerable'. The introduction of an appropriately designed water feature on site will act to mitigate flood risk.
10	Landscapes and Townscapes	This site has a generally very poor environmental quality, and a negative effect on landscapes. The metal recycling uses in particular are prominent and intrusive and have a very negative environmental effect on the townscape. Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved together with an opportunity to reopen the former Surrey Canal (subject to a feasibility study) to provide a new landscape feature.	++	(M – L) P	D	
11	Historic environment	This site possesses few buildings of historic merit with two exceptions at the Diploma Works and a public house on the site. They all fall within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains. Redevelopment presents an opportunity (subject to a feasibility study) to reopen the course of the Surrey Canal to make a link to the former history of the site.	+	(M – L) P	D	Ensure that development where possible enhances the character of the two buildings referred to.
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets.	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term.	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on any of these site. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.

16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	This area will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as positive, as are those for the social indicators particularly for the provision of housing. . Effects on the economy and on job provision are positive. This needs to be considered in the context that this site is under-used and has a low job density**  
**The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.**

#### E14 Plough Way Mixed Use Employment Location

The Council will require a comprehensive approach to the redevelopment of this site to provide::

- (a) Intensification of Uses within the B1 (a) – B1 (c) use class
- (b) Replacement of the Cannon Business Centre with small business units
- (c) A mixed use development that replaces the employment uses on the site with a mixture of types of employment, and with an element of residential development
- (d) Re-opening or re-use of the former Surrey Canal (subject to a feasibility study) that passes through the site in order to increase permeability, linkages and recreational opportunities.

The Council will be seeking a comprehensive redevelopment of this site to ensure that valuable existing occupiers can be re-accommodated in appropriate locations within the Mixed Use Employment Area, and to ensure that opportunities represented by the development to link development of the course of the former Surrey Canal as a landscape/water feature at Oxestalls Road are taken.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy is intended to boost the economy by the redevelopment of a sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. Significant current business uses will be replaced on site.	++	(M - L) P	D	Ensure that sufficient and varied premises are provided in order to attract a wide variety of businesses. Ensure that provision is made within the redevelopment for relocation of businesses.

2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. Construction of the development proposed in the policy will generate a number of short term construction jobs.	++	(M – L) P (S) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on construction waste. New residential development will involve an increased generation of waste by the occupiers.	--	(S – L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy. Residential occupants can be encouraged to recycle and reduce the amount of packaging by choice of goods purchased.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species. The reopening of the former Surrey Canal presents an opportunity to create a new water habitat.	++	(S – L) P	D	
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The construction of the development proposed by the policy will have short term negative impacts on air quality due to generation of dust.	+/-	(S – L) P (S) T	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Code of practice and planning conditions to minimise impact of construction.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient

		amount of energy required to transport goods. Similar comments apply to the residential element of this development.				vehicles.
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zone 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments for those uses categorised as 'more vulnerable' proposed for this site. The introduction of an appropriately landscaped water feature on the site will act to mitigate flood risk.
10	Landscapes and Townscapes	This sites are generally have a poor environmental quality, and have a negative effect on landscapes . Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved. The introduction of a new water feature (subject to a feasibility study) will introduce an attractive new element into the landscape of the area.	++	(M – L) P	D	
11	Historic environment	This site does not possess any buildings of particular historic merit . It falls within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains. The introduction of a new water feature by reopening the course of the former Surrey Canal (subject to a feasibility study) will introduce a new link to the history of the area .	+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme

						has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	
<p><b>Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as positive, as are those for the social indicators particularly for the provision of housing. Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density</b></p> <p><b>The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.</b></p>						

### E15 Surrey Canal Road Mixed Use Employment Location

The Council will require a comprehensive approach to the redevelopment of this site to provide:

- High quality, and high density mixed use business development that contributes to and enhances the Millwall Stadium area as a destination for visitors and for the local community
- The provision of a range of business and commercial development to maximise the employment contribution from the site.

The range of uses that could be accommodated are as follows:

- B1 office and where appropriate B1 (c) development
- Residential development
- Hotel
- Retail development
- Community Facility and/or leisure development

Opportunities should be taken to

- Enhance the attractiveness and functioning of the existing leisure facilities
- Improve access to South Bermondsey overground station
- Improve the connectivity of the site to the north and south

Any new residential development included as part of this mix would need to be carefully designed to enable the continued functioning of the adjacent waste transfer uses within the Strategic Employment Location, and to allow for the functioning of the proposed new East London Railway station.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	This policy is intended to boost the economy by the redevelopment of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area.	++	(M - L) P	D	Ensure that sufficient and varied premises are provided in order to attract a wide variety of businesses.
2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. Construction of this development as proposed by this policy will generate a significant number of short term construction jobs.	++	(M - L) P (S) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on const	--	(S - L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species.	-	(S - L) P	D	
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The construction of the development proposed by the policy will have short term negative impacts on air quality due to generation of dust.	+/-	(S - L) P (S) T	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Code of practice and planning condition to minimise impact of construction.
7	Reduce car travel and improve	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will	+/-	(S - L) P	D	Ensure that public transport is improved associated with the redevelopment. Promote East

	accessibility	need better public transport provision in order to function appropriately in terms of the level of development density proposed.				London Railway completion.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this development.	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zone 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments especially in consideration of those uses proposed for the site classified as 'more vulnerable'..
10	Landscapes and Townscapes	This area has a generally a poor environmental quality. Landscaping along Surrey Canal Road is extremely poor and presents a bleak environment.. Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved. There are some attractive older style warehouse buildings whose qualities could be enhanced in an appropriate settings.	++	(M – L) P	D	
11	Historic environment	This site possesses some older warehouse buildings of some historic interest. Redevelopment could enhance them by providing a better quality setting. The area falls within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains.	+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on

		this policy. The number of children requiring local education would be increased by the developments.				these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision
15	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
16	Accessibility	This area will be redeveloped to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	
<p><b>Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as positive, as are those for the social indicators particularly for the provision of housing. Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density</b></p> <p><b>The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.</b></p>						

#### E16 Grinstead Road Mixed Use Employment Location

The Council will require a comprehensive approach to the redevelopment of this site to provide::

- Residential development
- B1 (a) or (c) business development

The development should make a positive contribution to the streetscape at this location which presents a frontage on to Deptford Park and provide a Gateway to the commercial and industrial uses on Surrey Canal Road. The opportunity should be taken to provide a pedestrian and cycle link between Deptford Park and Folkestone Gardens using the railway arches at this location.

No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic	This policy is intended to boost the economy by the	++	(M - L) P	D	Ensure that sufficient and varied

	Growth	redevelopment of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area.				premises are provided in order to attract a wide variety of businesses.
2	Employment	The policy is intended to increase the number and variety of jobs provided on this site. Construction of this development will generate a number of short term construction jobs.	++	(M – L) P (S) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on const	--	(S – L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species.	-	(S – L) P	D	
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The construction of the development proposed by the policy will have short term adverse effects on air quality.	+/-	(S – L) P (S) T	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Code of practice to minimised impact of construction.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.

		development.				
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zones 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments.
10	Landscapes and Townscapes	This sites has a poor environmental quality, and have a negative effect on the local landscape and streetscape. It is adjacent to housing and opposite Deptford Park and is also prominent in terms of its position as the eastern gateway to the Surrey Canal Strategic Employment Location. Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved.	++	(M – L) P	D	
11	Historic environment	This site provides no buildings of historic interest or merit. Redevelopment will have no impact on the historic environment. . They all fall within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains.	0/+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a contribution to housing provision targets..	++	(M – L) P	D	Ensure that a the mix of housing units area provided.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	This area is partly empty and much of the rest is not well	++	(M – L) I	D/I	Security measures for individual

		occupied or used.. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.				estates such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	This site will be designed to improve accessibility – to public open space and improve linkages to areas that are severed by railway viaducts	++	(M – L) P	D	
<p><b>Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded positive, as are those for the social indicators particularly for the provision of housing. Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density</b></p> <p><b>The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.</b></p>						

### E17 Convoys Wharf Mixed Use Employment Location

Part of Convoys Wharf, as shown on the Proposals Map, is a protected wharf by two Directions made by the Secretary of State for the Environment. New developments within this area must use the site as a wharf, as described in the Secretary of State's directions, and will be referred to the Mayor of London before permission is granted.

New development proposals on the protected wharf which do not involve wharf uses will need to demonstrate that the wharf is no longer needed for this purpose. In order to do this the following information will be required:

- the length of time the site has been vacant, and demonstration by any applicant that the site has been actively and appropriately marketed for use as a wharf, having regard to port operator development timescales, together with current and future market demand for such a use;
- environmental impact of any current and future wharf use that may come forward (e.g. aggregates), and the physical suitability of the site for this;
- geographical proximity, and connections, to existing and potential market areas;
- the contribution a development not involving use of the site as a wharf would make to the physical, economic and social regeneration of the Borough, including the number of jobs likely to be created by the proposals.

If the criteria for release of the Protected Wharf from use as a wharf are satisfied, the Council will require a comprehensive mixed-use development that maximises the employment contribution from the site, subject to a detailed master plan to be prepared for the site, involving all the following uses:-

- tourism, heritage and leisure uses, especially those that enhance the river-related heritage of the site;
- commercial development especially river related development, including B1, B2 and live-work units;
- high density housing

In the case of wharf uses remaining on land reserved as a wharf, or on part of the site, or where the site or part of it, is still reserved for use as a wharf, any new development proposed on the rest of Convoys Wharf should not interfere with the operation of the wharf, or prejudice its future operation. New development on Convoys Wharf, outside of the land reserved as a wharf should be, in these circumstances for all the uses identified above, so far as this is consistent with the maintenance of the wharf use. It should also be subject to a detailed Master plan which will include the requirement that the employment contribution from the rest of Convoys Wharf is maximised.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
Economic						

1	Economic Growth	This policy is intended to boost the economy by the redevelopment of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. The protected wharf area on this site has been vacant for several years. It has the potential to make a contribution to the London economy as a whole by reinstating transport of goods via the River Thames and/or passenger transport.	++	(M - L) P	D	Ensure that sufficient and varied premises are provided in order to attract a wide variety of businesses. Ensure reuse of the wharf to maximise contribution to the economy.
2	Employment	The policy is intended to increase the number and variety of jobs provided by this sites. The site has been largely vacant for a number of years. Even when the wharf was in operation the employment density on the site was very low. Mixed use development would greatly increase the number of jobs generated on what is a very large site. Construction of the development would also generate a large number of temporary construction jobs.	++	(M - L) P (S) T	D	Ensure that local people have access to these jobs by providing training opportunities and local area agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on construction waste.	--	(S - L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The redevelopment of this sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques. The development is likely to decrease the amount of hard surfacing on what is a 16 hectare site, and thereby decrease water run off and improve water quality.	--/+	(S - L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. Introduction of water saving equipment in new buildings. Introduce soft landscaping on a site which is largely devoid of this.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species. Sites at Deptford are known to host the Black Redstart on the amber list of Birds of Conservation Concern.	-	(S - L) P	D	Special environmental measure for Black Redstart breeding
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. Short term adverse affects on air quality caused by construction.	+/-	(S - L) P	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these. Construction code of practice/planning

						conditions to minimise short term adverse effects from construction.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. This site will need better public transport provision in order to function appropriately in terms of the level of development density proposed. There will be an opportunity to provide passenger vehicles to use the river from the site.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods, as will use as a wharf to transport goods by river. Similar comments apply to the residential element of this development.	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use of appropriate energy efficient vehicles.
9	Mitigate flood risk	The Mixed Use Employment Locations are all located in Flood Risk Areas Zones 3 (High Probability). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments.
10	Landscapes and Townscapes	This site is isolated from the surrounding area and prevents access to the River Thames. Redevelopment will act to increase linkages and provide new townscapes and landscapes.	++	(M – L) P	D	
11	Historic environment	Convoys Wharf has a Grade 2 Listed Warehouse. There are likely to be extensive archaeological remains from the former Royal Naval Dockyard. Redevelopment will preserve the Listed Warehouse and provide an opportunity to investigate and preserve archaeological remains.	++	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these location will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by this	?	(M – L)	I	The Boroughs schools programme does not have

		policy. The number of children requiring local education would be increased by the developments.				proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning obligations required for extra school places.
16	Reduce crime	This site is inaccessible to the general public. This situation will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	
<p><b>Comment: Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as invariably positive, as are those for the social indicators particularly for the provision of housing. . Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density. The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.</b></p>						

<b>E18 Sun and Kent Wharf Mixed Use Employment Location</b>						
No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<p>The Council will require a mixed use development on this site including</p> <p>(a) business development (B1 (a) and (c))</p> <p>(b) residential development</p> <p>The opportunity should be taken to create a pedestrian and cycleway along the Creek edge to form part of the Waterlink Way long distance path. The Council will enter into S106 agreements with developers to ensure that a proportion of the business floorspace will be retained for use by the Creative industries or will apply appropriate planning conditions to ensure the maintenance of a creative cluster.</p>						
<b>Economic</b>						
1	Economic	This policy is intended to boost the economy by the redevelopment	++	(M - L) P	D	Ensure that sufficient and

	Growth	of sites that have a low employment density, and make a poorer contribution to the local economy than they would if redeveloped. The policy is intended to introduce new uses to the local economy, in order to produce a physical and social transformation of the area. Creekside has been identified as a location where the creative industries are important to the local economy.				varied premises are provided in order to attract a wide variety of businesses. Ensure that specific requirements are included in the policy for these industries.
2	Employment	The policy is intended to increase the number and variety of jobs provided by these sites. Construction of the proposed development would also generate a number of short term construction jobs.	++	(M – L) P (S) T	D	Ensure that local people have access to these jobs by providing training opportunities and local labour agreements.
<b>Environmental</b>						
3	Minimise waste	Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The construction of new mixed use development will have short term negative effects on const	--	(S – L) P/T	D/I	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.
4	Water resources	The redevelopment of these sites at a higher level and density of use will increase the use of water resources. However there will be an opportunity to introduce measures in new buildings to reduce the use of water, and to introduce sustainable urban drainage techniques.	--/+	(S – L) P	D	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas. Introduction of water saving equipment in new buildings.
5	Biodiversity	This policy will provide an opportunity to improve biodiversity on these sites by the provision of living roofs and a greater amount of landscaping with the provision of native species. The Black Redstart which is a rare breeding species of bird will need to be taken account of in landscaping proposals.	++	(S – L) P	D	Ensure that appropriate landscaping measures are taken in respect of the Black Redstart.
6	Air quality	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality.	+/-	(S – L) P	D/I	Increased use of less polluting vehicles and increase provision of public transport. Location of these sites will need to mitigate environmental impacts, or building design will need to minimise these.
7	Reduce car travel and improve accessibility	Provision of local business and industrial areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. Some of the sites will need better public transport provision in order to function appropriately in terms of the level of development density proposed.	+/-	(S – L) P	D	Ensure that public transport is improved associated with the redevelopment.
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the	+/-	(S – L) P	D	Installation of energy efficiency measures in buildings and use

		centre of London will have a beneficial effect by reducing the amount of energy required to transport goods. Similar comments apply to the residential element of this development.				of appropriate energy efficient vehicles.
9	Mitigate flood risk	The site is located in Flood Risk Area Zones 3 (High Probability of flooding). Redevelopment provides an opportunity to reduce the amount of hard surfacing which is extensive in the current form of built development, add green roofs and other flood mitigation measures. Residential development which is classified as 'More vulnerable' will be built on site.	-/+	(S – L) P	D	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems. Appropriate flood mitigation measures for these developments especially in reference to those uses classified as 'more vulnerable' proposed for this area.
10	Landscapes and Townscapes	This sites are generally have a poor environmental quality, and has a negative effect on landscapes. Part of the site has been redeveloped by the Laban Centre which has won architectural awards. Redevelopment will ensure that the overall quality of these sites, their urban design and landscaping quality is radically improved.	++	(M – L) P	D	
11	Historic environment	This site does not have buildings of historic interest and merit. It falls within the area of archaeological priority of the borough where redevelopment proposals may necessitate and present the opportunity for investigation/preservation of remains.	0/+	(M – L) P	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy proposes a mixed use development with high density housing that will make a high contribution to housing provision targets..	++	(M – L) P	D	Ensure that the mix of housing provided provides for family occupation as well as smaller units of accommodation.
13	Human health	Mixed use developments allow for the possibility of including local health facilities. A better quality environment will have an indirect effect improving human health in the long term. .	++	(M – L)	D/I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The provision of an increased number of local jobs within these locations will help reduce poverty and exclusion for some local people.	+	(L) P?	I	Ensure that training is available to enable local people to access jobs available.
15	Education	There are no Council proposals to build schools on this site. However, school uses would not necessarily be restricted by this policy. The number of children requiring local education would be increased by the developments.	?	(M – L)	I	The Boroughs schools programme does not have proposals to build on these sites, which are in many cases not suitable or accessible for school use any way. The programme has identified sites in appropriate locations to meet needs for school places. There may be planning

						obligations required for extra school places.
16	Reduce crime	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime, by leading to areas that are deserted at night. This will be changed by mixed use development designed with reduction of crime and the fear of crime in mind, a greater variety of uses inspiring more confidence, and increased passive surveillance.	++	(M – L) I	D/I	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision
17	Community welfare	This policy allowing for mixed use development will involve a likely increase in the number of community facilities available to local residents (including shopping facilities).	++	(M – L) P	I	Ensure that uses are provided as part of the development.
18	Accessibility	These sites will be designed to improve accessibility – to buildings, to public transport and to increase their integration with the surrounding development.	++	(M – L) P	D	

**Comment: The Council is seeking to achieve a balance between the desire to improve the overall environmental and social conditions of the borough, the provision of housing sites, and also the requirements to support the requirements of the London and local economy by the provision of appropriate sites. This policy has mixed positive and negative effects against a number of environmental indicators connected with the immediate effects of undertaking the redevelopment effects. Effects on the townscape, landscape and historic environment are recorded as positive, as are those for the social indicators particularly for the provision of housing. Effects on the economy and on job provision are positive. This needs to be considered in the context that most of these sites are under-used and have a low job density**  
**The redevelopment of these sites to modern building standards in accordance with up to date sustainability objectives presents a real opportunity to improve the sustainability of the borough.**

### E19 Other Employment Sites

The Council will grant permission for uses within the B Use Class for these sites that are appropriate to the surrounding context.

The Council will grant planning permission for changes of use away from the B Use Class for these premises in the following circumstances:

- The use is not compatible with an adjacent residential environment or other noise sensitive use
- The building has been vacant for at least eighteen months and appropriately marketed for that length of time, and evidence is provided to this effect
- The building is not within a town centre as defined on the Proposals Map.

Alternative uses considered will be as follows:

- Office accommodation
- Doctor and dentists surgeries and other similar premises
- Retail premises where the building /site is suitable
- Residential development where surrounding uses are residential

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +-	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy allows for a structured release of employment sites that are no longer used or suitable for this use to other beneficial uses.	-	P (S – L)	D	Ensure that measures to support local businesses are in

		Whilst many of these employment uses provide variety and viability to the local economy most of the uses are small so the overall effect of any loss is unpredictable. Pressure for housing provision may place undue pressure on some businesses to sell sites for this use to the detriment of the local economy.				place.
2	Employment	The policy allows for a structured release of small employment sites that are no longer used or suitable for this use to other beneficial uses that may also provide jobs. Whilst many of these employment uses provide variety and viability to the local economy most of the uses are small so the overall effect of any loss is unpredictable. Pressure for housing provision may place undue pressure on some businesses to sell sites for this use to the detriment of the local job provision.	+	P (S – L)	D	Replacement by other employment generating uses where possible.
<b>Environmental</b>						
3	Minimise waste	Reuse or redevelopment would cause short term increases in waste. Employment uses often generate waste. Replacement uses might be generate waste to the same degree. This is difficult to predict.	?	T/P (S – L)	D	Encourage recycling and waste reduction on the part of businesses and good practice in relation to construction waste and reuse of building materials.
4	Water resources	Various small differences in uses are difficult to assess against this indicator. Redevelopment would allow better landscaping and the provision of water efficiency measures.	+	P (S – L)	D	Ensure new buildings have water efficiency measures and appropriate landscaping, SUDs etc
5	Biodiversity	As above for biodiversity elements.	+	P (S – L)	D	Ensure provision of green roofs and landscaping in cases of redevelopment.
6	Air quality	Loss of local employment uses which this policy tries to reduce could increase local car journeys to access local services. Protection of a range of local businesses and services with provision of some jobs closer to home should have a minor beneficial effect on air quality.	+	P (S – L)	I	
7	Reduce car travel and improve accessibility	As above	+	P (S – L)	D	
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods	+/-	P (S – L)	D	
9	Mitigate flood risk	When the policy allows for redevelopment for other uses the opportunity to mitigate flood risk may be taken. However one outcome of the policy will be to preserve local buildings in economic use so the overall effect may be unpredictable. The policy deals with properties all over the borough so no particular flood risk area may be quoted. In the case of replacement of business uses with more	-/+	P (S – L)	D	Encourage businesses to provide other mitigation such as green roofs, more soft landscaping etc. Replacement of business uses with more vulnerable uses such as

		vulnerable uses such as residential development in areas of high flood risk then assessment of this would be required under PPS 25.				residential development would require a flood risk assessment, application of the sequential test if granted permission appropriate flood mitigation measures.
10	Landscapes and Townscapes	Business uses may have a positive or negative effect on townscapes dependent on the use, its location and the quality of the building. Business uses are however characteristic of townscapes and add to their character.	+	P (S – L)	D	
11	Historic environment	As above	+	P (S – L)	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy will allow the release of some sites for residential development. Due to the nature of the sites involved the amount of housing is difficult to predict.	+	P (S – L)	D	
13	Human health	By allowing the release of some employment sites for health facilities this policy will have an indirect benefit to human health	+	P (S – L)	I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The maintenance of a number of local jobs in various locations will help reduce poverty and exclusion for some local people.	+	P (S – L)	I	Ensure local people have training to access jobs available.
15	Education	This policy will possibly provide jobs that indirectly enable local people to access training opportunities.	+	P (S – L)	I	Ensure local people have support and prior training to obtain jobs
16	Reduce crime	A mix of uses tends to increase passive surveillance, increase footfall and thereby reduce crime and the fear of crime. In the case of redevelopment new buildings and landscaping will be designed with crime reduction in mind.	+	P (S – L)	I	
17	Community welfare	This policy intended to preserve a mix of local uses will indirectly increase community welfare.	+	P (S – L)	I	
18	Accessibility	This policy intended to preserve a mix of local uses will preserve accessibility to local facilities as far as possible.	+	P (S – L)	D	
<p><b>Comment: This policy concerns a wide range of small sites in varied locations. It is difficult to assess the overall effect of the policy because of the scattered and small nature of the sites. The appraisal records minor positive effects over a wide range of indicators. Minor negative effects are recorded against some environmental indicators if the change governed by the policy is change of use rather than redevelopment to new environmental standards.</b></p>						

### E20 Other Employment Sites in Town Centre Locations

Applications for redevelopment or change of use should follow the following principles:

- Provide a ground floor B1 commercial use to replace any employment lost in the new development
- Or If the site is within a core/non core shopping area the alternative ground floor use may be a retail use
- Dependent on the nature of the location upper floors could be office or residential use

Developers should refer to the appropriate retail policy in respect of the Use Class of any proposed retail use.

No	SA Objective	Effect of policy against SA objective	Significance of effect --,-,0,+,++,?, +	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	The policy will act to preserve commercial or add extra retail facilities in town centres thereby supporting the vitality and viability of town centres.	++	P (S – L)	D	
2	Employment	This policy should act to preserve a variety of employment uses in town centres	++	P (S – L)	D	Ensure that local people have training opportunities to access these jobs.
<b>Environmental</b>						
3	Minimise waste	In the case of redevelopment there will be short term effects in respect of waste involved in construction activities. Commercial activities involve the production of waste but as these are for the most part to be replaced with new ones the overall effect might be small.	0/-	T/P (S – L)	D	Encourage good practice with regard to construction waste and re use of building materials. Encourage commercial users to recycle and reduce packaging.
4	Water resources	Redevelopment will provide some opportunities dependent on the nature of the site to improve water quality and reduce wastage by new landscaping, SUDS, water saving equipment within the building and other techniques. However the effect is likely to be small as many applications may be changes of use.	+	P (S – L)	D	
5	Biodiversity	As – above. Redevelopment with new buildings will provide more opportunities to provide landscaping and other green elements on some sites.	+	P (S – L)	D	
6	Air quality	Loss of local employment uses which this policy tries to reduce could increase local car journeys to access local services. Protection of a range of local businesses and services with provision of some jobs closer to home should have a minor beneficial effect on air quality.	+	P (S – L)	I	
7	Reduce car travel and improve accessibility	As above	+	P (S – L)	D	
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods	+/-	P (S – L)	D	
9	Mitigate flood risk	When the policy allows for redevelopment for other uses the opportunity to mitigate flood risk may be taken. However one outcome of the policy will be to preserve local buildings in economic use so the overall effect may be unpredictable. The policy deals with properties all over the borough so no particular flood risk area may be quoted. In the case of replacement of business uses with more	-/+	P (S – L)	D	Encourage businesses to provide other mitigation such as green roofs, more soft landscaping etc. Replacement of business uses with more vulnerable uses such as

		vulnerable uses such as residential development in areas of high flood risk then assessment of this would be required under PPS 25.				residential development would require a flood risk assessment, application of the sequential test if granted permission appropriate flood mitigation measures.
10	Landscapes and Townscapes	Business uses may have a positive or negative effect on townscapes dependent on the use, its location and the quality of the building.	?	P (S – L)	D	
11	Historic environment	As above	?	P (S – L)	D	
<b>Social</b>						
12	Sufficient & decent housing	This policy will allow the release of some sites for residential development. Due to the nature of the sites involved the amount of housing is difficult to predict.	+	P (S – L)	D	
13	Human health	By allowing the release of some employment sites for health facilities this policy will have an indirect benefit to human health	+	P (S – L)	I	
14	Reduce poverty & exclusion	This policy will have an indirect effect on reducing poverty and exclusion. The maintenance of a number of local jobs in various town centre locations will help reduce poverty and exclusion for some local people.	+	P (S – L)	I	Ensure local people have training to access jobs available.
15	Education	This policy will possibly provide jobs that indirectly enable local people to access training opportunities.	+	P (S – L)	I	Ensure local people have support and prior training to obtain jobs
16	Reduce crime	A mix of uses tends to increase passive surveillance, increase footfall and thereby reduce crime and the fear of crime. In the case of redevelopment new buildings and landscaping will be designed with crime reduction in mind.	+	P (S – L)	I	
17	Community welfare	This policy intended to preserve a mix of local uses will indirectly increase community welfare.	+	P (S – L)	I	
18	Accessibility	This policy intended to preserve a mix of local uses will preserve accessibility to local facilities as far as possible.	+	P (S – L)	D	
<p><b>Comment: Comment: This policy concerns a wide range of small sites in varied locations. It is difficult to assess the overall effect of the policy because of the scattered and small nature of the sites. The appraisal records minor positive effects over a wide range of indicators. Minor negative effects are recorded against some environmental indicators if the change governed by the policy is change of use rather than redevelopment to new environmental standards.</b></p>						

### E21 Office Development

Applications for B1 development, ancillary to existing employment generating uses will generally be granted, subject to conformity with other policies in this Plan.

No	SA Objective	Effect of policy against SA objective	Significance of effect	Timescale P or T	Cause D/I	Mitigation/enhancement measures
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			--,-,0,+,++,?, +-	(S/M/L?)		
<b>Economic</b>						
1	Economic Growth	This policy will support the requirements of existing businesses in the Borough.	+	P (S – L)	D	
2	Employment	The policy will support the physical requirements of existing businesses in the Borough and thereby lead potentially to an increase in local job opportunities.	+	P (S – L)	D	Ensure that local people have appropriate support and training to access job opportunities.
<b>Environmental</b>						
3	Minimise waste	In the case of redevelopment there will be short term effects in respect of waste involved in construction activities. Commercial activities involve the production of waste.	-	P/T (S – L)	D	Encourage good practice with regard to construction waste and re use of building materials. Encourage commercial users to recycle and reduce packaging.
4	Water resources	New developments will provide some opportunities dependent on the nature of the site to improve water quality and reduce wastage by new landscaping, SUDS, water saving equipment within the building and other techniques. However the effect is likely to be small as this policy concerns developments that are ancillary to main uses.	+	P (S – L)	D	
5	Biodiversity	As – above. Redevelopment with new buildings will provide more opportunities to provide landscaping and other green elements on some sites.	+	P (S – L)	D	
6	Air quality	Protection of a range of local businesses and services by allowing for ancillary offices in support of the business with provision of some jobs closer to home should have a minor beneficial effect on air quality.	+	P (S – L)	I	
7	Reduce car travel and improve accessibility	As above. The developments should have the effect of reducing car journeys	+	P (S – L)	D	
8	Climate change	Office uses will contribute to emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods	+/-	P (S – L)	D	
9	Mitigate flood risk	When the policy allows for new development for the opportunity to mitigate flood risk may be taken. However one outcome of the policy will be to preserve local buildings in economic use so the overall effect may be unpredictable. The policy deals with properties all over the borough so no particular flood risk area may be quoted. .	-/+	P (S – L)	D	Encourage businesses to provide other mitigation such as green roofs, more soft landscaping etc. .
10	Landscapes and Townscapes	New office development will be designed to an appropriate standard to enhance the townscape.	+	P (S – L)	D	
11	Historic environment	As above	?	P (S – L)	D	

Social						
12	Sufficient & decent housing	This policy is not relevant to the provision of sufficient and decent housing	0	N/A	N/A	
13	Human health	This policy is not relevant to human health.	0	N/A	N/A	
14	Reduce poverty & exclusion	This policy may have a minor indirect effect on this objective by supporting the operational requirements of businesses, increasing the viability of the economy and thereby the provision of jobs.	+	P (S – L)	I	
15	Education	Training opportunities may arise from firms that can increase their business by having office requirements met.	+	P (S – L)	I	Ensure local people have support to access jobs and training.
16	Reduce crime	This policy is not relevant to crime reduction.	0	0	0	
17	Community welfare	This policy is not relevant to community welfare.	0	0	0	
18	Accessibility	This policy by supporting the operational requirements of existing businesses for office space may improve accessibility to jobs closer to home.	+	P (S – L)	I	Ensure local people have support to access jobs and training.
<b>Comment: This policy is covers small developments of ancillary office facilities to existing businesses. As such the effect on sustainability objectives is likely to be minor in scope</b>						

E22 Local Labour Agreements						
<p>The Council supports the employment of local people in the construction of and end use of new commercial and industrial developments in the borough.</p> <p>The Council may seek to secure planning obligations on development sites providing over 1000 m2 of office space, 2000 m2 of industrial or warehousing uses or 1000ft2 of retail development, towards the cost of training local people in the skills and qualifications required to access employment in the construction of and end use phase of the development.</p>						
No	SA Objective	Effect of policy against SA objective	Significance of effect --, -, 0, +, ++, ?, +	Timescale P or T (S/M/L/?)	Cause D/I	Mitigation/enhancement measures
<b>Economic</b>						
1	Economic Growth	Supporting local people to gain jobs will encourage economic growth locally by ensuring that the economic benefit of large new developments is used to the advantage of local people, and reinvested in the local economy.	++	P (S – L)	D	
2	Employment	As above for employment	++	P (S – L)	D	
<b>Environmental</b>						
3	Minimise waste	Not relevant to waste issues	0	0	0	
4	Water resources	Not relevant to water resource issues	0	0	0	
5	Biodiversity	Not relevant to biodiversity issues	0	0	0	
6	Air quality	Enabling people to obtain jobs closer to homes will reduce travel and possibly have a positive effect on air quality	+	P (S – L)	I	
7	Reduce car travel and improve	Enabling people to obtain jobs closer to homes will reduce travel and possibly have a positive effect on air quality	+	P (S – L)	D	

	accessibility					
8	Climate change	Reduction in travel requirements will probably result in fewer long journeys taken and a reduction in carbon emissions	+	P (S – L)	D	
9	Mitigate flood risk	Not relevant to flood risk mitigation	0	0		
10	Landscapes and Townscapes	Not relevant to landscapes and townscapes	0	0		
11	Historic environment	Not relevant to historic environment	0	0		
<b>Social</b>						
12	Sufficient & decent housing	Not relevant to sufficient and decent housing	0	0		
13	Human health	No relevant to human health	0	0		
14	Reduce poverty & exclusion	Enabling local people to gain access to good jobs and training close to home will indirectly reduce poverty and exclusion	++	P (S – L)	D	
15	Education	Enabling local people to gain training close to home improve adult education	++	P (S – L)	D	
16	Reduce crime	Not relevant to crime reduction	0	0		
17	Community welfare	Enabling local people to gain access to jobs and training will indirectly improve community welfare as w whole	+	P (S – L)	I	
18	Accessibility	Not relevant to accessibility	0	0		
<b>Comment: This policy scores well against social and economic effects and also has positive effects connected with the fact that it is likely that d=fewer and longer journeys would need to be made to jobs closer to home.</b>						

## Appendix E – Policy Appraisal Matrix

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<b>HOMES FOR ALL</b>																				
<b>Presumption in favour of sustainable development</b>																				
<p><b>Option 1</b></p> <p>1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.</p> <p>2. Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>1. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:</p> <p>a). any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or</p> <p>b). specific policies in that Framework indicate that development should be restricted.</p>	++	++	-	-	0	0/1	-	0	+/1	+/1	0	+/1	0	-	+	+	+	0	+	<p>1, 2 - Promotes sustainable development and will encourage economic growth and development.</p> <p>15, 16, 17 - Sustainable development may have beneficial outcomes such as improved health and wellbeing and social inclusion for the local population.</p> <p>9,10 - Sensible implementation of this policy option is important to ensure that the development occurs in a sustainable manner where policies are either out of date or not relevant. Without careful assessment, development may have the potential for adverse impacts on the local environment though increased waste generation locally, potential impacts on human health through air quality with increased construction and biodiversity through potential decreases in open/natural spaces</p>
<p><b>Alternative 1</b></p> <p>Relying on the policies in the London Plan and Core Strategy rather than a separate DMLP policy.</p> <p>Not a true alternative as the NPPF requires this policy to be in local plans.</p>	+	+	-	-	0	0/1	-	0	+/1	+/1	0	+/1	0	-	+	+	+	0	+	<p>1,2 - Reduced positive effects on sustained economic growth and employment and new enterprise.</p>
<b>Prevention of loss of existing housing</b>																				
<p><b>Option 2</b></p> <p>1.The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use including change of use in the following circumstances:</p> <p>a).the proposed redevelopment would result in</p>	-	-	+	+	0	1	-	0	-/1	-/1	+/1	+/1	++	++	+	0	0	0	0	<p>1, 2 - Economic viability is considered within this policy; however land use competition may occur with other sectors.</p> <p>3, 4 - Overall positive. Retention of housing and sustainable use of resources.</p> <p>5 – No direct impact identified.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>housing gain which regenerate and replace older housing estates in line with an agreed plan or strategy</p> <p>b).the land or premises are allocated for another use in an adopted Local Plan</p> <p>c). a change of use to a local community service or facility is proposed that meets identified need</p> <p>d). an economic viability study confirms that the dwelling/s cannot be rehabilitated to a satisfactory standard at reasonable cost</p> <p>e). evidence shows that environmental problems are such that demolition and redevelopment is the only effective option.</p> <p>2. The reconversion of a former single dwelling house with multiple dwellings to a single dwelling may be acceptable in predominantly residential areas suitable for family occupation subject to amenity considerations and DM Options 29, 30, 31 and 32.</p>																				<p>6 - Retention of old building stock could be positive to biodiversity / bats if implemented correctly.</p> <p>7 – Temporary noise / air pollution during construction phase.</p> <p>8 – No direct impact identified.</p> <p>9, 10 – Existing housing is unlikely to meet current building regulations and it may not be possible to incorporate sustainable design principles.</p> <p>11, 12 – Policy protects existing housing / townscapes where viable.</p> <p>13, 14 – Positive to providing sustainable housing for the community.</p> <p>15 – Potential negative impacts may arise by protecting existing housing infrastructure that is located in areas that do not include social inclusion.</p> <p>16, 17, 18, 19 – No impact identified.</p>	
<p><b>Alternative 1</b> Relying on the policies in the London Plan and Core Strategy rather than a separate DMLP policy.</p>	0	0	1/0	1	-	1	1/-	1	1	1	1	1	1	++	+	+	0	+	1/-	0	<p><b>Assessment results from the SA of the CS Policy 1:</b></p> <p>“Positive sustainability impacts in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporarily pollution nuisance during the construction phase.”</p>
<p><b>Alternative 2</b> Excluding parts 1d and 1e from DM Option 2 which allows demolition / redevelopment / change of use for economic / environmental reasons.</p>	1	1	+	+	0	+	-	0	-	-	-/1	-/1	-	-	+/1	0	-	0	0	<p>1, 2 - Economic viability is considered within this policy; however land use competition may occur with other sectors.</p> <p>3, 4 – existing housing is protected, therefore new build will only occur when it is necessary</p> <p>5 – No direct impact identified.</p> <p>6 - Retention of old building stock could be positive to biodiversity / bats if implemented correctly.</p> <p>7 – Temporary noise / air pollution during construction phase.</p> <p>8 – No direct impact identified.</p> <p>9, 10 – Existing housing may not be able</p>	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>to be upgraded with sustainable design principles.</p> <p>11, 12 – Townscapes will be protected were viable, it may not be economic variable to protect heritage assets and could result in more derelict unused buildings in the long term.</p> <p>13, 14, 15 – Long term may result in further decline in existing housing.</p> <p>16, – No direct impact identified.</p> <p>17 – could result in decline of existing housing stock, resulting in derelict buildings which may lead to crime and reduce community safety</p> <p>18, 19 – No direct impact identified.</p>
<b>Conversion of residential dwellings and office space</b>																				
<p><b>Option 3</b></p> <p>1. The Council will not grant planning permission for the conversion of a single dwelling into flats other than in the following circumstances:</p> <p>a). physical situation, environmental conditions or lack of external amenity space means that the dwelling is not suitable for family occupation and the dwelling has a net internal floorspace greater than 130 sq.m. and</p> <p>b). any conversion permitted meets the general design requirements and housing standards in DM Option 24 (Landscaping and trees), DM Option 29 (Urban design and local character), DM Option 30 (Alterations and extensions to existing buildings including residential extensions) and DM Option 31 (Housing design, layout and space standards).</p> <p>Conversions of office space and other commercial properties into flats</p> <p>2. The Council will support the conversion of office space and other commercial properties into self contained flats in the following circumstances:</p> <p>a). the proposal does not conflict with other policies in relation to employment floorspace and shopping frontages (DM Options 8, 9, 10, 11, 13, 14, 15)</p> <p>b). the proposal meets the standards set out for residential development in DM Option 31 (Housing design, layout and space standards)</p> <p>c). the proposal achieves a good living</p>	-	-	+	+	0	+/l	-	0	-/l	-/l	+/l	+/l	++	++	-	0	0	0	0	<p>1, 2 - Economic viability is considered within this policy; however land use competition may occur with other sectors.</p> <p>3, 4 - Overall positive. Retention of housing and sustainable use of resources.</p> <p>5 – No direct impact identified.</p> <p>6 - Retention of old building stock could be positive to biodiversity / bats if implemented correctly.</p> <p>7 – Temporary noise / air pollution during construction phase.</p> <p>8 – No direct impact identified.</p> <p>9, 10 – Existing housing is unlikely to meet current building regulations and it may not be possible to incorporate sustainable design principles.</p> <p>11, 12 – Policy protects existing housing / townscapes where viable.</p> <p>13, 14 – Positive to providing sustainable housing for the community.</p> <p>15 – Potential negative impacts may arise by protecting existing housing infrastructure that is located in areas that do not include social inclusion.</p> <p>16, 17, 18, 19 – No impact identified.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
environment with adequate access, parking and safety standards, refuse storage and collection arrangements and  d).the conversion of a public house for residential use will need to meet the requirements of DM Option 19 (Public Houses).																				
<b>Alternative 1:</b> Reliance on the London Plan and Core Strategy	-	-	0	0	0	0	I	0	I	I	0	0	+	+	-	0	0	0	0	The London Plan states that Londoners should have 'a genuine choice of homes that they can afford and which meet their requirements for difference sizes and types of dwellings in the highest quality environments.'  The Core Strategy seeks to achieve mixed and balanced communities and preserve a choice of accommodation sizes in line with policies in the London Plan.  However this is less specific guidance for conversions which incorporate less strict social and environmental controls.
<b>Alternative 2:</b> The conversion of houses into flats will not be permitted where the net floorspace of a dwelling falls below 200/175/150 sq. m. as originally constructed.	-	-	+	+	0	+/I	-	0	-/I	-/I	+/I	+/I	+	+	-	0	0	0	0	Similar effects as for Option 3, however with likelihood of reduced mixture of residential dwelling types.
<b>Alternative 3:</b> Retain the UDP threshold (see saved UDP Policy HSG 9 (Conversion of residential property) for allowing conversions at a net floorspace of 130 sq.m as originally constructed.	-	-	+	+	0	+/I	-	0	-/I	-/I	+/I	+/I	+	+	-	0	0	0	0	Similar effects as for Alternative 2, however would not necessarily reduce the conversion of larger residential dwellings.
<b>Alternative 4</b> The conversion of houses in areas of the borough where there are a large number of family houses potentially available and/or where conversion of these would result in the number of flats in the area predominating over single family dwellings or an increase in the concentration of flats will not be permitted (known as Areas of Restraint).	-	-	+	+	0	+/I	-	0	-/I	-/I	+/I	+/I	+	+	-	0	0	0	0	Similar effects as for Option 3, but would likely not prevent the conversion of family homes into smaller dwellings as for alternatives above.
<b>Sheltered housing and care homes</b>																				
<b>Option 4</b> 1.The Council will support proposals for sheltered housing and care homes provided that the development:  a). will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and or care	I	I	I/-	I/-	I/-	I/-	-	++	-	-	-	-	++	++	+	+	I/-	I/+	++	1, 2 - Economic viability is considered within this policy however land use competition may occur with other sectors.  3, 4, 5, 6 - Policy makes no mention of incorporating sustainability principles in housing implementation and design.  7 - Potential for temporary noise / air pollution during construction.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>b). will be easily accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers as well as immediate proximity to local services.</p> <p>2. In the case of market-led development of self-contained sheltered housing in Use Class C3, the Council will expect the development to make a contribution to the supply of affordable housing in accordance with Core Strategy Policy 1. In the case of care homes, particularly for older people, the Council will encourage a mix of tenures.</p> <p>3. The Council will support development of care homes that combine independent living with the availability of support and nursing care.</p> <p>4. The Council will resist development that involves the net loss of floorspace in sheltered housing and care homes for older people unless:</p> <p>a). adequate replacement accommodation will be provided that satisfies criteria 1. a and 1.b above or</p> <p>b). it can be demonstrated that there is a surplus of care homes in the area; and</p> <p>c). it can be demonstrated that the existing care homes are incapable of meeting industry standards for suitable accommodation.</p> <p>5. Where the Council is satisfied that a development involving the loss of sheltered housing or care homes is justified, it will expect re-provision of an equivalent amount of residential floorspace, or of permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.</p>																				<p>8 - Positioning close to public transport, shops, services etc.</p> <p>9, 10, 11, - Policy makes no mention of incorporating sustainability principles in housing implementation and design.</p> <p>12 - Promotes new housing development.</p> <p>13 - Promotes new / additional housing and encourages mixed tenure.</p> <p>14 - Promotes care of the elderly and promotes affordable housing across a mix of tenures.</p> <p>15 - Promotes suitable homes and improved access to community facilities and social networks.</p> <p>16 - Promotes access to community facilities.</p> <p>17 Ageing populations are considered an equality group and may require additional community safety designs.</p> <p>18, 19 - Promotes access to community facilities / public transport etc.</p>
<p><b>Alternative 1</b></p> <p>Locating sheltered housing and care homes anywhere rather than in easily accessible areas</p>	I	I	I/-	I/-	I/-	I/-	-	-	-	-	-	-	++	-	-	I	-	-	-	<p>1, 2 - Economic viability is considered within this policy however land use competition may occur with other sectors.</p> <p>3, 4, 5, 6 - Policy makes no mention of incorporating sustainability principles in housing implementation and design.</p> <p>7 - Potential for temporary noise / air pollution during construction. Increased levels of individual car travel.</p> <p>8 – Not Positioned close to public transport, shops, services etc.</p> <p>9, 10, 11, - Policy makes no mention of incorporating sustainability principles in</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>housing implementation and design. Increased individual car travel.</p> <p>12 - Promotes new housing development.</p> <p>13 - Promotes new / additional housing and encourages mixed tenure.</p> <p>14, 15 - Promotes suitable homes and care of elderly although access to services and facilities is not promoted, this may result in higher levels of deprivation</p> <p>16 – No Impact identified</p> <p>17 Elderly a vulnerable section of the community - may fall prey to anti-social behaviour / crime if care homes sited in trouble areas.</p> <p>18, 19 – Does not promote access to community facilities / public transport etc.</p>
<p><b>Alternative 2</b></p> <p>Relying on the London Plan and Core Strategy policies rather than specific policies in the DMLP.</p>			/-	/-	/-	/-	-	++	-	-	-	-	-	-	-	/+	/-	-	+	<p>1, 2 - Economic viability is considered within this policy however land use competition may occur with other sectors.</p> <p>3, 4, 5, 6 - Policy makes no mention of incorporating sustainability principles in housing implementation and design.</p> <p>7 - Potential for temporary noise / air pollution during construction.</p> <p>8 - Positioning close to public transport, shops, services etc.</p> <p>9, 10, 11, - Policy makes no mention of incorporating sustainability principles in housing implementation and design.</p> <p>12 - Promotes new housing development but removes the requirement for affordable housing.</p> <p>13, 14 , 15 - Housing will only benefit those who can afford it. Increases inequality in health and reduces mix of tenure types</p> <p>16 - Promotes access to community facilities.</p> <p>17 Elderly a vulnerable section of the community - may fall prey to anti-social behaviour / crime if care homes sited in trouble areas.</p> <p>18 - Increase inequality and reduce social inclusion.</p> <p>19 - Promotes access to community facilities / public transport etc. but only for those who can afford it.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<b>Houses in Multiple Occupation</b>																					
<p><b>Option 5</b></p> <p>1. The Council will consider the provision of new Houses in Multiple Occupation where they:</p> <p>a). are located in an area with a public transport accessibility level (PTAL) of 3 or higher</p> <p>b). do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood</p> <p>c). do not result in the loss of existing larger housing suitable for family occupation</p> <p>d). satisfy the housing space standards outlined in DM Option 31 and</p> <p>e). satisfy the appropriate Environmental Health standards.</p> <p>2. The Council will resist the loss of good quality Houses in Multiple Occupation.</p> <p>3. The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.</p> <p>4. All new HMOs are required to provide 10% wheelchair accessible rooms and must be fully fitted from occupation.</p>	0	+	I/-	I/-	+	0	-	++	I/-	I/-	-	-	+	+	I/+	++	I	I	-	<p>1 - No impact identified</p> <p>2 - Promotes affordable housing to those on lower incomes. Allows work-force to live and work in Lewisham.</p> <p>3, 4 - Multiple autonomous occupants per household may result in greater amounts of waste being produced, less storage for recyclables.</p> <p>5 - Seeks to protect neighbourhoods from significant adverse amenity impacts</p> <p>6 - No impact identified</p> <p>7 - Possible temporary noise / air pollution during construction. Possible increased noise / anti-social behaviour in multiple occupant properties.</p> <p>8 - Situating HMOs near public transport / improving access may reduce car travel.</p> <p>9, 10 - New HMOs have the potential to incorporate sustainable design. No mention of this in policy. HMOs likely to use more resources.</p> <p>11 - Promotes protection of amenity land although provision of new HMOs may negatively impact the historical townscape.</p> <p>12 - Provision of new HMOs may lead to loss of historical buildings and assets.</p> <p>13, 14 - Promotes good quality affordable housing to the required Environmental Health standards.</p> <p>15 - Promotes good quality affordable homes although there is a potential conflict with amenity impacts as a result of HMOs in neighbourhoods.</p> <p>16 - Affordable good quality housing promotes stable learning environments. Wheelchair accessibility promotes social inclusion.</p> <p>17, 18 - Dependent on ensuring that HMOs do not result in anti-social behaviour or negative impacts to neighbourhoods and amenity.</p> <p>19 - HMOs near to community facilities / infrastructure.</p>	
<p><b>Alternative 1</b></p> <p>Relying on the policies in the London Plan and Core Strategy rather than a separate DMLP policy.</p>	0	0	I/0	I	-	I	I/-	I	I	I	I	I	++	+	+	0	+	I/-	0	<p><b>Assessment results from the SA of the CS Policy 1:</b></p>	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>"Positive sustainability impacts in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporarily pollution nuisance during the construction phase."</p>
<p><b>Alternative 2</b> Restricting HMOs to certain locations such as town centres or those with a high PTAL.</p>	I	I/+	I/-	I/-	+	0	-	++	I/-	I/-	-	-	+	+	I/+	+	I/-	I -	++	<p>1 - Potential for conflict with other sectors.</p> <p>2 - Promotes affordable housing to those on lower incomes. Allows work-force to live and work in Lewisham. Potential conflict with other sectors if focussed within town centres.</p> <p>3, 4 - Multiple autonomous occupants per household may result in greater amounts of waste being produced.</p> <p>5 - Locating near town centres would reduce the likelihood of impacting open areas and impacting amenity of surrounding neighbourhoods.</p> <p>6 - No impact identified</p> <p>7 - Possible temporary noise / air pollution during construction. Possible increased noise / anti-social behaviour in multiple occupant properties.</p> <p>8 - Situating of HMOs near town centres and public transport will improve accessibility.</p> <p>9, 10 - New HMOs have the potential to incorporate sustainable design. No mention of this in policy. HMOs likely to use more resources than purely residential housing.</p> <p>11 - Promotes protection of amenity land although provision of new HMOs will negatively impact the historical townscape.</p> <p>12 - Provision of new HMOs will lead to loss of historical buildings and assets.</p> <p>13, 14 - Promotes good quality affordable housing to the required Environmental Health standards.</p> <p>15 - Promotes good quality affordable</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>homes although there is a potential conflict with amenity impacts as a result of HMOs in neighbourhoods.</p> <p>16 - Affordable good quality housing promotes stable learning environments.</p> <p>17, 18 - Dependent on ensuring that HMOs do not result in anti-social behaviour or negative impacts to neighbourhoods and amenity.</p> <p>19 - No mention of locating HMOs near to community facilities / infrastructure.</p>
<b>Affordable Rent</b>																				
<p><b>Option 6</b></p> <p>1. The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.</p> <p>2. In providing affordable rented housing:</p> <p>a). the percentage of dwellings for this tenure shall be negotiated with the Council to ensure homes are genuinely affordable for households on low incomes,</p> <p>b). rents should not to exceed 'target rents' for dwellings of 3 bedrooms or more,</p> <p>c). the dwellings are to remain at 'target rent' levels in perpetuity.</p>																				<p>1 - Economic viability is considered within this policy; however land use competition may occur with other sectors.</p> <p>2 - Promotes affordable housing to those on lower incomes. Allows work-force to live and work in Lewisham.</p> <p>3, 4, 5, 6 - No reference to sustainable design / management.</p> <p>7 - Possible temporary noise / air pollution during construction. Possible increased noise / anti-social behaviour.</p> <p>8 - No reference to location near to public transport / improved accessibility.</p> <p>9, 10 - New affordable housing has the potential to incorporate sustainable design. No mention of this in policy.</p> <p>11, 12 - No mention of protection / enhancement of landscape or historical assets.</p> <p>13- Promotes a mixture of housing types, including affordable.</p> <p>14, 15 - Promotes mixed / balanced communities with potential to improve health and wellbeing.</p> <p>16 - Affordable good quality housing promotes stable learning environments.</p> <p>17, 18 - Possible increase in crime within affordable housing areas. Potential conflicts for social cohesion.</p> <p>19 - No mention of accessible locating.</p>
<p><b>Alternative 1</b></p> <p>Relying on London Plan and Core Strategy: The Council will require new residential development to provide on site affordable</p>																				<p><b>Assessment results from the SA of the CS Policy 1::</b></p> <p>"Positive sustainability impacts in terms of providing a range of housing across the</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
housing in accordance with Core Strategy Policy 1																				<p>borough and also in terms of tackling social exclusion by meeting the housing needs of various groups. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporarily pollution nuisance during the construction phase."</p>
<p><b>Alternative 2</b> The Council does not prescribe target rent levels for any type of affordable rented housing and leaves this for the housing provider to determine.</p>																				<p>1 - Economic viability is considered within this policy; however land use competition may occur with other sectors.</p> <p>2 – No targets to promote affordable housing to those on lower incomes, may not result in allowing work-force to live and work in Lewisham.</p> <p>3, 4, 5, 6 - No reference to sustainable design / management. Depends on implementation</p> <p>7 - Possible temporary noise / air pollution during construction. Possible increased noise / anti-social behaviour.</p> <p>8 - No reference to location near to public transport / improved accessibility.</p> <p>9, 10 - New affordable housing has the potential to incorporate sustainable design. No mention of this in policy.</p> <p>11, 12 - No mention of protection / enhancement of landscape or historical assets.</p> <p>13- May result in unaffordable rents for vulnerable members of the community.</p> <p>14, 15 - May promote inequality / unaffordable rents for vulnerable members of the community.</p> <p>16 - No impact identified.</p> <p>17, 18 - Possible increase in crime within affordable housing areas. Potential conflicts for social cohesion.</p> <p>19 - No mention of accessible locating.</p>
	I	-/I	I/-	I/-	I/-	I/-	I/O	I/-	I	I	-	-	I/-	I/-	0	+	I/-	I/-	I	
<b>Student Housing</b>																				
<p><b>Option 7</b> 1. The Council will, support proposals for student housing provided that the development: a). will not involve the loss of permanent self-</p>																				
	+	+	+	+	+	0	-	+	+	+	-/I	-	++	-/I	-/I	++	?	?	++	
																				<p>1, 2 – Dependent on implementation although policy does promote protection of employment land.</p> <p>3, 4 – Potentially positive as policy promotes high quality and sustainable</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>contained homes</p> <p>b). will not involve the loss of designated employment land</p> <p>c). will not involve the loss of leisure or community space</p> <p>d). will not prejudice the Council's ability to meet its annual London Plan housing target for additional self-contained homes</p> <p>e) has an identified end user affiliated with an educational institution or student housing management company</p> <p>e). is well served by public transport and is accessible to a range of town centre, leisure and community services</p> <p>f). provides a high quality living environment and includes a range of unit sizes and layouts, with and without shared facilities, to meet the requirements of the educational institutions it will serve</p> <p>g). complies with all relevant national and local standards and codes including Accredited Network UK (ANUK) and any relevant standards for houses in multiple occupation (HMOs)</p> <p>h). demonstrates that it is suitable for year round occupation and that it has long term adaptability and sustainability, including adequate and suitable cycle parking</p> <p>i). contributes to creating a mixed and inclusive community and</p> <p>j). does not cause harm to residential amenity or the surrounding area.</p> <p>2. The Council will resist development that involves the net loss of student housing unless:</p> <p>a). adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or</p> <p>b). the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Lewisham or adjoining boroughs.</p> <p>3. Where the Council is satisfied that a development involving the loss of student housing is justified, the replacement development is to provide an equivalent amount of residential floor space for permanent housing in Use Class C3, including an appropriate amount of affordable housing,</p>																				<p>builds.</p> <p>5 – Protects open space.</p> <p>6 – No impact identified.</p> <p>7 - Temporary noise and air pollution during construction phase. Potential for increased noise due to night time economy.</p> <p>8 - Promotes reduced travel by situating student accommodation near public transport.</p> <p>9, 10 - Promotes sustainable builds and siting near public transport.</p> <p>11 - Development may alter the current townscape although opportunities for enhancement. exist</p> <p>12 - New development will lead to loss of historical buildings and assets.</p> <p>13 - Promotes sustainable, high quality housing for students.</p> <p>14, 15 - Potential for conflicts - increased noise, nuisances and inequalities in health / wellbeing.</p> <p>16 - Improves access to education.</p> <p>17, 18 - Conflicts may arise from policy implementation. Seeks to promote social inclusion although problems may arise from noise and anti-social behaviour associated with students.</p> <p>19 - Promotes accessibility to leisure and community services.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
having regard to Core Strategy Policy 1.																				
<b>Alternative 1</b> Relying on the policies in the London Plan and Core Strategy rather than a separate DMLP policy.	0	0	I/O	I	-	I	I/-	I	I	I	I	I	++	+	+	0	+	I/-	0	<b>Assessment results from the SA of the CS Policy 1:</b>  "Positive sustainability impacts in terms of providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups. Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects such as use of natural resources, flood risk, impact on climate change - depends upon implementation. There could be some temporarily pollution nuisance during the construction phase."
<b>Alternative 2</b> Only locating student housing within town centres or near to public transport.	I/-	I/-	+	+	+	0	-	++	+	+	I/-	-	I/+	I/-	I/-	++	I	I	+	1, 2 – Land use competition may occur with other sectors.  3, 4 – Potentially positive as policy promotes high quality and sustainable builds.  5 – Protects open space.  6 – No impact identified.  7 - Temporary noise and air pollution during construction phase. Potential for increased noise due to night time economy.  8 - Promotes reduced travel through by situating student accommodation near public transport.  9, 10 - Promotes sustainable builds and siting near public transport.  11 - Development may alter the current townscape although opportunities for enhancement.  12 - New development will lead to loss of historical buildings and assets.  13 - Promotes sustainable, high quality housing for students. May however reduce the mix of tenures within town centres / around institutions.  14, 15 - Focussing students within certain areas may intensify nuisance and / or anti-social behaviour associated with students and the night time economy.  16 - Improves access to education.  17, 18 - Focussing students within certain areas may intensify nuisance and / or anti-



Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<b>Alternatives</b> Reliance on the Core Strategy policies instead of specific DMLP policies.	+	+	-	-	+/-	+/-	+/-	+/-	+/-	-	-	-	+	+	+	+	+	+	+	<b>Assessment results from the SA of the CS Policy 1:</b> <i>"Likely to diversify economic base to provide both social and economic benefits. Physical improvements will improve connectivity, landscape and townscape. Negative waste generation but waste management will need to be implemented."</i>
<b>Local employment locations</b>																				
<b>DM Option 9</b> 1. The Council will consider uses within the B Use Class, within a Local Employment Location, subject to: a). the use being appropriate in the location in relation to the surrounding built context, b). the intensity of the use, and c). The new use meeting the aims in the Core Strategy Policy 3. 2. Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses. 3. New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses. 4. Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.	++	++	-	-	0	0	-	-	-	-	-	-	+/-	+	+	+	+	+	+	1, 2 Long term positive effect on employment and the economy 3, Waste may be produced by these sectors 4, Natural resource use will increase 5, 6, No impact identified 7, 8, 9 New and existing development may increase congestion, thus reduce air quality and produce CO <sub>2</sub> emissions 10, New urban developments are likely to increase hard surfaces 11, 12 New developments may impact landscape, townscape and the historic environment 13, Land use conflict may occur 14, 15, 16, 17, 18, 19 Policy promotes mixed use development, this should be positive to reducing inequalities by, providing local employment opportunities
<b>Alternative 1</b> Allow free changes of use within the B Use Class within appropriate environmental parameters.	+/-	+/-	-	-	+/-	+/-	+/-	+/-	+/-	-	-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	A number of uncertainties are identified – to include positive and negative effects. This may have the disadvantage of allowing certain uses to predominate which might militate against the flexibility of use that smaller premises allow for, resulting in possibly negative impacts on social cohesion and long term sustainable economic growth

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<b>Alternative 2</b> Reliance on the London Plan and Core Strategy policies rather than specific DMLP policies	+	+	-	-	0	0	+/-	+/-	+/-	-	-	-	+	+	+	+	+	+	+	<b>Assessment results from the SA of the CS Policy 3:</b> <i>"LEL Likely to diversify economic base and helps in promoting sustainable economic growth. Warehouse activities likely to create transport movement which may further increase CO2 emissions impacting air quality. Promoting creative industries likely to improve skill levels"</i>
<b>Other employment locations</b>																				
<b>DM Option 10</b> 1. The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, District and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses and where the use is compatible with the surrounding built context by reason that they: a). Are well located in relation to the highway network b). Are well located in relation to town centres and public transport c). Offer the potential for the expansion of existing in-situ businesses d). Offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area and e). Provide lower cost industrial accommodation suitable for small, start-up businesses 2. Redevelopment of a site on a commercial street frontage will be supported when the site or building is redeveloped to a high standard of environmental and design quality in line with the other policies in this plan, and a business use is retained on the ground floor and a business and/or residential development on upper floors where an appropriate standard of amenity can be achieved. Uses not within the B Use class, such as retail or other uses appropriate to a town centre or district/local hub will be considered as part of a mix of uses where the number of jobs created by the proposal outweighs the loss of an employment site. 3. Where uses are proposed for a site or	++	++	-	-	0	0	+	+	+	+	+	-	0	+	+	+	++	+	+	1, 2 Long term positive effect on employment and the economy 3, Waste may be produced by these sectors 4, Natural resource use will increase 5, 6, No impact identified 7, 8, 9, 10, 11, 12 High standard design and protection of amenity is promoted 13, Land use conflict may occur 14, 15, 16, 17, 18, 19 Policy should be positive to reducing inequalities and promoting social cohesion by, providing local employment opportunities and training



Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				pollution 9, 10, 11, 12 High standard design and protection of amenity is not promoted 13, Land use conflict may occur 14, 15, 16, 17, 18, 19 This may result in a depletion of services in residential areas, a reduction in the number of buildings available for commercial/business use and a reduction in the vitality and viability of the local economy.
<b>Alternative 2</b> Reliance on the London Plan and Core Strategy policies rather than a specific DMLP policy	+	+	-	-	0	0	+	+/-	+/-	+/-	+/-	+/-	0	+	+	+	+	+	+	<b>Assessment results from the SA of the CS Policy 3:</b> Similar to DM Option 10 – “ <i>Smaller pockets of employment locations in various parts of the borough will contribute to local economic growth, job opportunities and training.</i> ”
<b>RETAIL AND TOWN CENTRES</b>																				
<b>Town Centre Vitality and Viability</b>																				
<b>Option 11</b> 1. Proposals within a designated town centre, as shown on the Policies Map, will be resisted unless the viability and vitality of the town centre is sustained and enhanced through the: a). provision of a mix of uses to encourage a range of uses through the day and evening b). Incorporation of design principles such as active frontages at ground floor and effective street lighting with a view to making the town centre a safer place c). Provision of high quality shop fronts, in accordance with DM Option 18.	++	++	-	-	0	0	-	+	+/-		++	+/-	+	+	+	0	+	+	+	1, 2 - Promotes town centre enhancements and mixed use development. 3 - Development likely to result in short term increase in productions of construction waste. 4 - May have adverse impacts for resource use as more resources are required in the long term for operation and in the short term for construction. 5, 6 - No impact identified 7 - Short term increase in noise and vibration during construction. 8 - Improvement of town centres within Lewisham is likely to reduce the need for residents to travel to other areas for shopping, leisure etc. 9, 10 - Opportunity for town centre design to incorporate sustainable design principles for climate change and flood risk adaptation and mitigation. Likely to increase resource use. 11, 12 - Promotes sustained and enhanced development of the town centre. However, conflicts may arise between new development and retention of historical assets.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>13 - Promotes a mix of uses within the town centre.</p> <p>14, 15 - Improvement of town centre is likely to improve community wellbeing, with the promotion of mixed use development contributing positively to social inclusion and deprivation.</p> <p>16 - No impact identified.</p> <p>17 - Promotes long term improvement in community safety.</p> <p>18, 19 - Improvements in Lewisham's town centres are likely to enhance and contain civic life within the borough leading to a range of social benefits.</p>
<p><b>Alternative 1</b> Rely on the London Plan and Core Strategy rather than a specific DMLP policy</p>	+	++	-	-			-	-/	-/				0/	+	+	0	+	+	+/	<p><b>Assessment results from the SA of the CS Policy 6:</b></p> <p><i>"Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources."</i></p>
<b>Location of main town centre uses</b>																				
<p><b>Option 12</b> 1. The location of main town centre uses needs to be in accordance with Core Strategy Policy 6. For major retail development (over 1,000 square metres), if suitable sites are not available in the major and district centres then edge of centre sites should be considered, followed only then by out-of-centre sites in locations that are accessible by public transport, walking and cycling and are well connected to the town centre.</p> <p>2. Proposals for retail provision of 1,000 square metres gross floor space or more on the edge or outside of the major and district centres will require an impact assessment and will only be considered if the following criteria are satisfied:</p> <p>a). there is a quantitative and qualitative need for the proposal</p> <p>b). there are no other sites available in</p>	++	++	-	-	/-	/-	-	+	+/-			/-	0	+	+	0	0	0	+	<p>1, 2 - Promotes development and protects employment land.</p> <p>3 - Development likely to result in short term increase in productions of construction waste.</p> <p>4 - May have adverse impacts for resource use as more resources are required in the long term for operation and in the short term for construction.</p> <p>5, 6 - Dependent on how and where future developments are sited, there may be long term adverse impacts for biodiversity and open spaces.</p> <p>7 - Short term increase in noise and vibration during construction.</p> <p>8 - Promotes location of large retail outlets in accessible areas within Lewisham is likely to reduce the need for residents to travel to other areas for shopping, leisure</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>accordance with the sequential test</p> <p>c). the proposal, either by itself or together with other recently or committed developments, would not demonstrably harm the vitality and viability of an existing shopping centre</p> <p>d). the proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres</p> <p>e). the proposal is sited so as to reduce the number and length of car journeys and can serve not only car journeys but also those on foot, bicycle or public transport</p> <p>f). the proposal is not on designated employment land as shown on the Proposals Map and for which a demand can be established and</p> <p>g). if planning permission were to be granted then a planning obligation may be negotiated.</p>																				<p>etc.</p> <p>9, 10 - Opportunity for developments to incorporate sustainable design principles for climate change and flood risk adaptation and mitigation.</p> <p>11, 12 - Dependent on implementation although potential for conflict with cultural heritage assets..</p> <p>13 - No impact identified.</p> <p>14, 15 - Improvement of access to retail facilities and sensitive placement is likely to enhance lifestyles within Lewisham whilst promoting social inclusion and reducing deprivation.</p> <p>16, 17, 18 - No impact identified.</p> <p>19 - Promotes accessible locating of large retail outlets.</p>
<p><b>Alternative 1:</b></p> <p>Relying on retail thresholds detailed in the NPPF.</p>	+/-	+/-	-	-	l/-	l/-	-	+	+/-	l/-	l/-	l/-	0	+/-	+/-	0	0	0	+	<p>The NPPF threshold is 150% greater than that detailed in DM Option 11. Utilising this threshold may therefore result in reduced restrictions and sensible implementation of developments between 2500 and 1000 square metres which, by Lewisham standards, are nonetheless of a significant scale. This may result in additional long term adverse impacts on the environment and potentially community wellbeing. Setting the bar lower (1000 square metres) will ensure that all developments which are likely to have significant effects on Lewisham, are considered through planning and impact assessment.</p>
<p><b>Alternative 2:</b></p> <p>Reliance on the London Plan and Core Strategy</p>	+	++	-	-	l	l	-	-l	-l	l	l	l	0/l	+	+	0	+	+	+l	<p><b>Assessment results from the SA of the CS Policy 6:</b></p> <p><i>“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”</i></p>
<b>District Centres Shopping Frontages</b>																				
<p><b>Option 13</b></p> <p>Within the primary shopping frontages of the Blackheath, Deptford, Downham, Forest Hill,</p>	+	+	-	-	0	0	-	-	0	0	0	+	+l	-	+	+	+	+	+	<p>1,2 – Will encourage economic growth and enterprise.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>Lee Green and Sydenham district centres (as shown on the Proposals Map), the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:</p> <p>a). not harm the predominant retail character of the shopping frontage</p> <p>b). not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together and 70% of A1 uses maintained in the primary shopping frontage</p> <p>c). generate a significant number of pedestrian visits, thereby avoiding the creation of an area of relative inactivity in the shopping frontage</p> <p>d). occupy a vacant unit, having regard to both their number within the district centre as a whole and the primary frontage and the length of time the unit has been vacant</p> <p>e). not introduce a residential use at ground floor level, and</p> <p>f). not result in adverse effects caused by crime, disorder and anti-social behaviour.</p> <p>2. Within the secondary shopping frontages of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Proposals Map) the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:</p> <p>a). introduce an A2, A3, A4, A5 or D2 use</p> <p>b). not harm the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)</p> <p>c). not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together</p> <p>d). not harm the retail character, attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units</p> <p>e). retain an appearance which is compatible with adjoining shop units including window presentation</p> <p>f). provide an active frontage at ground floor level</p>																				<p>3,4 – new construction will increase resource use and waste generation</p> <p>5,6 – no impact identified</p> <p>7,8 – car travel to retail areas in district centres</p> <p>9,10,11 – No impact identified</p> <p>12,13 – townscape maintained, enhancement of heritage assets depends on implementation</p> <p>14 – resists residential conversion</p> <p>15,16,17,18,19 – positive effects for local population</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>g). not introduce residential uses at ground floor level.</p> <p>3. Outside the primary and secondary shopping frontages areas of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Proposals Map) the Council will consider applications for development or a change of use from a ground floor shop (Class A1) where the following are met:</p> <p>a). the amenity of adjoining properties is not harmed</p> <p>b). the character, attractiveness, vitality and viability of the centre as a whole is not harmed</p> <p>c).in the case of a change to a residential use, the proposal would not result in a harmful break to the continuity of the retail frontage.</p>																					
<p><b>Alternative 1</b> Rely on Core Strategy</p>	+	+	-/I	I	0	0	-/I	-	0	0	0/I	+	+	-	0/I	+	+	+	+	<p>From SA of CS Policy 3: "District Hubs will contribute to the protection of economic growth and employment as they protect core shopping areas for retail and employment purposes....positively impact on the general safety and the well-being of the population and will promote social inclusion."</p>	
<p><b>Alternative 2:</b> Set the percentage of A1 uses in the primary shopping frontage at levels that are specific to individual centres based on the existing percentages.</p>	+/I	+/I	-	-/I	0	0	-/I	-/I	0	0	0	+	+	-	0/I	-/I	I	+	+	<p>This alternative will have similar beneficial and adverse impacts as for DM Policy Option 13. However by setting targets for A1 development in different areas of the borough, this may have negative effects on economic growth within Lewisham and lead to inequalities in terms of accessibility and social inclusion across the borough.</p>	
<p><b>Alternative 3:</b> Set the percentage of A1 uses in the secondary shopping frontage at levels that are specific to individual centres, based on the existing percentages.</p>	+/I	+/I	-	-/I	0	0	-/I	-/I	0	0	0	+	+	-	0/I	-/I	I	+	+	<p>This alternative is likely to have similar impacts as for alternative 2.</p>	
<p><b>Alternative 4:</b> Set a blanket percentage of A1 uses in the secondary shopping frontages at 50%.</p>	+/I	+/I	-	-/I	0	0	-/I	-/I	0	0	0	-/I	-/I	-	0/I	-/I	I	+	+	<p>By applying a target for development as opposed to the detailed criteria in the DM Policy Option 13, this would likely have negative effects on the population, human, health and material assets through the absence of assessment in the policy option against streetscape and amenity of</p>	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				the proposed development.
<b>Neighbourhood Local Centres</b>																				
<p><b>Option 14</b></p> <p>Within the designated neighbourhood local centres of Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, the Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.</p> <p>2. A change of use to non-A1 uses will only be considered if the following criteria are satisfied:</p> <p>a. a high standard of design and appropriate layout is achieved, including high quality shop fronts, in accordance with DM Option 18</p> <p>b. provision of an attractive window display</p> <p>c. reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent</p> <p>d. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)</p> <p>e. a balance to the number and type of units within the parade (where 40% of A1 uses are maintained)</p> <p>f. there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)</p> <p>g. there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation</p> <p>h. that adequate provision for access for people with disabilities is made</p> <p>i. the use would not normally result in adverse effects caused by crime, disorder and anti-social behaviour.</p> <p>3. A change of use to residential at ground floor will only be permitted at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage.</p>																				<p>1, 2 - Encourages retention of local business across a range of uses.</p> <p>3, 4 - Possible short term increase in waste production during construction and long term increase in resource use</p> <p>5, 6 - No impact identified</p> <p>7 - Considers long term noise and disturbance in change of use. Likely short term increase in noise/vibration during construction.</p> <p>8 - Promotes retention or placement of shops in easily accessible areas for local residents.</p> <p>9 - Retention of essential services within neighbourhoods is likely to reduce the need to travel. Possible indirect benefit for fossil fuel emissions and climate change adaption.</p> <p>10 - No impact identified</p> <p>11, 12 - Promotes a high standard of design and attractive window displays. Also promotes the protection of surrounding buildings and amenity.</p> <p>13 - No impact identified</p> <p>14, 15 - Promotes shops and town centres of a high standard which are accessible to the local community.</p> <p>16, 17, 18 - No impact identified</p> <p>19 - Promotes accessible local shopping areas.</p>
<p><b>Alternative 1:</b></p> <p>1. Exclude 2(d) from the assessment criteria.</p>																				<p>Removal of this requirement is likely to make A1 shops less accessible to parts of the community. As these shops usually stock essential daily goods, removing the</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				requirement for other similar shops to be available to the community is likely to have adverse long term impacts on local wellbeing, increase deprivation, and potential increase car use and travel, which may have adverse impacts for the environment.
<b>Alternative 2:</b> Rely on the London Plan and Core Strategy																				<p><b>Assessment results from the SA of the CS Policy 6:</b></p> <p>“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”</p> <p>DM Option 4 is focussed on retention of A1 listed premises and is likely to offer greater clarity in terms of implementing policy objectives.</p>
	+	++	-	-			-	-/	-/				0/	+	+	0	+	+	+/	
<b>Local Shopping Parades and Corner Shops</b>																				
<p><b>Option 15</b></p> <p>1. The Council will seek to retain Class A1 shops located in a local shopping parade or operated as a corner shop in order to preserve or enhance the local character and support the provision of essential daily goods and services, unless an applicant can demonstrate:</p> <p>a). the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)</p> <p>b). a balance to the number and type of units within the parade</p> <p>c). that reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent and</p> <p>d). The replacement use will result in no harm to the amenity of adjoining properties.</p> <p>2. A change of use to residential is located at the end of the row of a retail parade, but not in corner shops, in order to preserve the continuity of the retail frontage.</p>	+/-	+	-	-	0	0	0	+	+	0	+	+	-	+	+	0	0	0	+	<p>1, 2 - Encourages retention of local business across a range of uses. Potential for land-use conflict with other businesses.</p> <p>3, 4 - Possible short term increase in waste production during construction and long term increase in resource use.</p> <p>5, 6, 7 - No impact identified</p> <p>8 - Promotes retention or placement of shops in easily accessible areas for local residents – reduces car travel.</p> <p>9 - Retention of essential services within neighbourhoods is likely to reduce the need to travel. Possible indirect benefit for fossil fuel emissions and climate change adaptation</p> <p>10 - No impact identified</p> <p>11, 12 - Promotes a high standard of design and attractive window displays. Also promotes the protection of surrounding buildings and amenity.</p> <p>13 - May result in some land-use conflict with residential dwellings</p> <p>14, 15 - Promotes shops and town centres</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>of a high standard which are accessible to the local community.</p> <p>16, 17, 18 - No impact identified</p> <p>19 - Promotes accessible local shopping areas.</p>
	+/-	+	0	0	0	0	0	0	0	0	+	+	-	+	+	0	+	0	+	<p>Alternative 1 is likely to have similar positive and adverse effects when compared to DM Option 5, although the inclusion of the alternative policies is likely to have additional benefits for the townscape and for community safety and wellbeing.</p> <p>Restricting various types of development may also adversely impact the local economy although the benefits obtained through community safety and wellbeing has the potential to balance this out.</p>
<p><b>Alternative 1</b> An additional criteria, expanding on 1(b), where various types of uses are restricted, for example proposals for hot food take-aways and betting shops will be resisted where they are in proximity (400 metres or less) to schools or sensitive community facilities.</p>	+/-	+/-	-	-	0	0	0	+/l	+/l	0	+	+	-	+	+	0	+	0	+	<p>This alternative is likely to have similar positive and adverse effects when compared to DM Option 15, although the inclusion of the above option is likely to have additional benefits on community health, safety and wellbeing.</p> <p>Restricting various types of development may also adversely impact the local economy although the benefits obtained through community safety and wellbeing has the potential to balance this out.</p>
<p><b>Alternative 2</b> Reliance on the London Plan and Core Strategy</p>	+	++	-	-	l	l	-	-/l	-/l	l	l	l	0/l	+	+	0	+	+	+/l	<p><b>Assessment results from the SA of the CS Policy 6:</b></p> <p><i>“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”</i></p>
<b>Restaurants, Cafes and Drinking Establishments</b>																				
<p><b>Option 16</b> 1. The Council will consider proposals for restaurants and cafés (A3) and drinking establishments (A4) where the following are met:  a). the location and design is acceptable and the proposed use does not detrimentally affect</p>	++	+	-	-	0	0	l/-	0	-	0	l	l	0	l	l	0	-	0	0	<p>1, 2 - Promotes applications for new enterprise within Lewisham.</p> <p>3, 4 - These use types generally require high levels of resource use and produce greater volumes of waste. Likely long term adverse impacts if recycling and energy management are not incorporated into</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>the vitality of the shopping area</p> <p>b. there is no harm to the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and un-neighbourly opening hours and</p> <p>c. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.</p> <p>2. In addition applicants will be expected to provide acceptable arrangements for:</p> <p>a). the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive</p> <p>b). the collection, storage and disposal of bulk refuse and customer litter</p> <p>c). sound proofing, especially if living accommodation is above or adjacent</p> <p>d). the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00am to 11.00pm in neighbourhood local centres and local parades.</p>																				<p>developments.</p> <p>5, 6 - No impact identified</p> <p>7 - The policy considers management of noise and disturbance although success will depend on implementation. Some increase in noise is likely as a result of these premises.</p> <p>8 - Developments are typically high resource users. Measures for energy efficiency should be considered.</p> <p>10 - No impact identified.</p> <p>11, 12 - The policy considers the impact of these establishments on the vitality of the surrounding area.</p> <p>13 - No impact identified</p> <p>14, 15 - The policy safeguards the wellbeing of communities and amenity of surrounding areas, despite its focus being on entertainment establishments. Sensible implementation will be crucial.</p> <p>16 - No impact identified.</p> <p>17 - Drinking establishments tend to attract anti-social behaviour resulting from the night-time economy. Implementation will be key to ensure that these establishments do not have an adverse effect on community safety.</p> <p>18, 19 - No impact identified.</p>
<p><b>Alternative 1</b></p> <p>Reliance on the Core Strategy</p>	+	++	-	-			-	-/	-/				0/	+	+	0	+	+	+/	<p><b>Assessment results from the SA of the CS Policy 6:</b></p> <p><i>“Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.”</i></p> <p>Relying purely on the CS, while containing prescriptive policies for town centre development, is likely to offer less clarity for developers and the planning authority when compared to DM Option 17.</p>
<p><b>Alternative 2</b></p> <p>A new criteria 1(d) stating that the proposals for</p>	+	+	-	-	0	0	/-	0	-	0			0	/+	/+	0	-/	0	0	1, 2 - Promotes applications for new

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
restaurants, cafes and drinking establishments in the town centres and local parades will not exceed 15% of the number of units in that centre/parade.																				<p>enterprise within Lewisham.</p> <p>3, 4 - These use types generally require high levels of resource use and produce greater volumes of waste. Likely long term adverse impacts if recycling and energy management are not incorporated into developments.</p> <p>5, 6 - No impact identified</p> <p>7 - The policy considers management of noise and disturbance although success will depend on implementation. Some increase in noise is likely as a result of these premises but target may restrict.</p> <p>8 - Developments are typically high resource users. Measures for energy efficiency should be considered.</p> <p>10 - No impact identified.</p> <p>11, 12 - The policy considers the impact of these establishments on the vitality of the surrounding area.</p> <p>13 - No impact identified</p> <p>14, 15 - The policy safeguards the wellbeing of communities and amenity of surrounding areas, despite its focus being on entertainment establishments.</p> <p>16 - No impact identified.</p> <p>17 - Drinking establishments tend to attract anti-social behaviour resulting from the night-time economy. Implementation would be key with a target.</p> <p>18, 19 - No impact identified.</p>
<b>Hot Food Take-away shops</b>																				
<p><b>Option 17</b></p> <p>1. The Council will not grant planning permission for new hot food take-away shops (A5) that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).</p> <p>2. The Council will only consider granting planning permission for new hot food take-away shops (A5) outside of the exclusion zone where:</p> <p>a). the percentage of hot food take-aways (A5) in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10%</p> <p>b). the number of hot food take-aways (A5) in Local Parades of nineteen units or less does</p>	-	-	+/I	I	0	0	+	+/I	-	0	0	-	-	0	++	+	0	+	-/I	<p>1,2 – Restrictions placed on development</p> <p>3 – waste management and litter explicitly in option</p> <p>4 – consumption depends on policy implementation</p> <p>5,6 – No impact identified</p> <p>7, 8 – Depends on implementation within communities and resident requirements for travel.</p> <p>9 – Emissions to air</p> <p>10, 11 – No impact identified</p> <p>12, 13 – hot food take aways unlikely to contribute to borough heritage /</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>not exceed one hot food take-away shop</p> <p>c). the number of hot food take-aways (A5) in Local Parades of twenty or more units does not exceed two hot food take-away shops</p> <p>d. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area (in accordance with DM Option 18 - Shopfronts)</p> <p>e). there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and</p> <p>f). parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.</p> <p>3. In addition, applicants will be expected to provide acceptable arrangements for:</p> <p>a). the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive</p> <p>b). the collection, storage and disposal of bulk refuse and customer litter</p> <p>c). sound proofing, especially if living accommodation is above or adjacent and</p> <p>d). the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00 am to 11.00 pm in neighbourhood local centres and local parades.</p>																				<p>landscapes.</p> <p>14, 17 – No impact identified</p> <p>15 – Restrictions on hot food take-aways (including exclusion zone) will have positive health effects.</p> <p>16 – Outcomes of 15, effect 16.</p> <p>18 – anti-social behaviour discouraged in criteria.</p> <p>19 – Depends on implementation, but hot food take-aways likely to have negative effects on cultural /community infrastructure.</p>
<p><b>Alternative 1:</b></p> <p>Reliance on the London Plan and Core Strategy</p>																				<p>The London Plan directs boroughs to promote the health and well-being of communities and identify and address significant health issues, for example by increasing access to healthy foods and developing local policies to address concerns over the development of fast food outlets close to schools.</p> <p>Lewisham's Core Strategy promotes and supports local food growing and urban agriculture which is one way to increase access to healthy food, however the Council is also concerned about restricting access to unhealthy foods.</p> <p>Neither of these documents contains policies that directly address the development of hot food take-aways. Thus DM Policy Option 17 will provide much more specific guidance and certainty for their development for developers as</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				compared to this alternative.
<b>Alternative 2</b> Set the percentage of A5 uses in a shopping area to a blanket percentage of 10% regardless of the type of centre/parade	++	+	-	-	0	0	1/-	0	-	0	1	1	0	1	1	0	-	0	0	Alternative 2 is likely to have similar positive and adverse effects when compare to DM Option 17.  Restricting the number of take-away shops is likely to maintain the mix of uses on the high-street and contribute to enhancing the townscape. This is however highly dependent on implementation and the type of other uses in place.
<b>Shop fronts, signs and hoardings</b>																				
<b>Option 18</b> Shop fronts should be designed to a high quality and reflect and improve the character and quality of their surroundings. This will be achieved by the following: a). retention of high quality shop fronts both within and outside Conservation Areas. This would include retention of original fascia, pilasters and columns including where shop units are combined. Where retention is not possible replacements should use high quality materials and use a design appropriate to the period and character of the building b). new shop fronts and the replacement of non-period shop fronts should use high quality materials, and use a design that relates well to the proportion, scale and detailing of the host building and makes a positive contribution to the streetscape. Where possible existing original pilasters, brackets and fascia should be retained and the new shopfronts should relate well to these features. c). new shop signs should relate successfully to the architectural features and detailing of the building. Architectural features such as cornices, pilasters and columns should not be obscured d). provision of separate access to any residential accommodation on other floors, an encourage the restoration of such access if already removed e). provision of suitable access for people with disabilities in new shop fronts f). provision of storage for refuse bins where possible g). refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and	+	+	-	-	0	0	-	0	-	0	++	+	0	+	0	0	0	0	0	1 2 - Enhances the character and appeal of Lewisham - possible long term positives for encouraging business and employment.  3 - Likely short term increase in construction waste.  4 - Possible short term adverse effects for resource use as specific materials will need to be sources and transported to site.  5, 6 - No impact identified.  7 - Likely short term adverse effects during construction.  8 - No impact identified  9 - Likely short term adverse effects as materials are resourced and transported.  10 - No impact identified  11, 12 - Positive to improving and maintaining the local townscape and heritage assets.  13 - No impact identified.  14 - Enhances the appeal and living environment within Lewisham. This is likely to have long term positive effects for health and wellbeing.  15, 16, 17, 18, 19 - No impact identified.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>character of an area</p> <p>h). roller grilles and shutters for security purposes should be of an open mesh variety leaving the shop window visible, with the box for any grille or shutter contained behind the fascia where possible</p> <p>i). within Conservation Areas and residential areas, internally illuminated box signs and projecting signs will not be permitted unless they are successfully related to the design and detailing of the building and positively contribute to the special character of a group of buildings or the street.</p> <p>2. The Council will not grant planning permission for the display of poster hoardings which are considered to be out of scale and character with the building/site on which they are displayed. Temporary hoardings may be suitable for some form of public art.</p>																					
<p><b>Alternative 1</b> Reliance on the London Plan and Core Strategy</p>	+/	+/	?	?	?	?	0	0	0	0	0	-/	-/	0	0	0	0	0	0	0	There are is limited policy detail with regard to shop frontage design, in the Core Strategy. Without DM Option 7, direct adverse impacts may arise as shop frontages may detract from the townscape (without appropriate guidance) with further indirect socio-economic impacts for Lewisham.
<b>Public Houses</b>																					
<p><b>Option 19</b></p> <p>1. The Council will only permit the change of use or redevelopment of a public house (A4) after an assessment of the following:</p> <p>a).a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including the length of time the public house has been vacant, evidenced by the applicant of active and appropriate marketing for a constant period of at least 36 months at the existing use value</p> <p>b). the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision, including evidence that the premises have been offered to use or to hire at a reasonable charge to community or voluntary organisations over a 12 month period and there is no longer a demand for such use</p> <p>c). the design, character and heritage value of</p>	-	-	+/	+/	0	0	0	0	-	0	0	+	+	-	0	+	0	0	+	<p>1,2 – This option places restrictions on development which may negatively impact economic growth and employment opportunities.</p> <p>3, 4 –Through aiming to retain public houses, there may be a positive effect (based on implementation) on not needing new construction</p> <p>5,6,7,8 – No direct impacts identified.</p> <p>9 – Retention of existing buildings may be difficult to retrofit energy efficient equipment.</p> <p>10, 11 – No impacts identified</p> <p>12, 13 – Specifically addresses acknowledgement of public house buildings are a unique element of the townscape for protection.</p> <p>14 – Places restrictions on conversion to residential dwellings</p> <p>15, 17, 18 – No direct impacts identified</p>	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance</p> <p>d). the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained, and for the ground floor to remain in use for a range of non-residential uses, including D1, as appropriate.</p> <p>3. The proposed change of use of a public house for residential use will only be acceptable where:</p> <p>a). the proposal has been assessed against parts 1c and 1d of this policy option and the impact of the proposal on these features and</p> <p>b).where the Council is satisfied that residential use is acceptable, the accommodation to be provided is of the highest quality and meet the requirements outlined in DM Policy Option 31 (Housing design, layout and space standards).</p>																				<p>16 – promotes community function of public houses</p> <p>19 – Protects community infrastructure.</p>
<p><b>Alternative 1</b></p> <p>Reducing the 36 month time period specified in 1a. to 24 months</p>	+/	+/	+/-	+/-	0	0	0	0	-	0	0	-/	-/	-	0	+	0	0	-/+	<p>Similar to Option 19, except may have positive economic effects for less waiting periods for development which provides uncertain impacts for resource use and community infrastructure related to implementation.</p>
<p><b>Alternative 2</b></p> <p>Not requiring a viability report to justify the loss of a public house</p>	+	+	-	-	0	0	0	0	-	0	0	-/	-/	-	0	+	0	0	-	<p>Similar to Alternative 1, however with more negative effects linked to less restrictions on loss of public houses to other use.</p>
<p><b>Alternative 3</b></p> <p>Not requiring a building to be retained if loss of the A4 use is deemed acceptable</p>	+	+	-	-	0	0	0	0	-	0	0	-	-	-	0	+	0	0	-	<p>Similar to Alternative 2, however with less protection of the historic, streetscape or townscape value of a public house if economics promote change of A4 use.</p>
<p><b>Alternative 4</b></p> <p>Reliance on the London Plan and Core</p>	?	?	?	?	0	0	0	0		0	0	?	?	+/	0	+	0	0	?	<p>There is limited policy detail with regard to public houses in the Core Strategy. Without DM Policy Option 19, direct</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
Strategy																				adverse impacts may arise as public houses are converted to other uses within Lewisham (without appropriate guidance) with further indirect socio-economic impacts for Lewisham.
<b>Mini Cab or Taxi Offices</b>																				
<b>Option 20</b> 1. The Council will grant planning permission for mini cab or taxi businesses only in locations where they: a). would not cause any adverse impact on the surrounding area by virtue of traffic congestion, including parking, which would be of detriment to the safety of other vehicle users, pedestrians and cyclists b). are well lit and have good CCTV facilities; and c). would not have a detrimental effect on the amenities of adjoining property, especially residential occupiers, including that caused by noise disturbance.	-/+	-/+	0	0	0	0	-	-	-	0	0	+	0	0	+/!	+/!	0	+	+/!	1,2 – Whilst there are negative effects through restrictions on development, overall the option provides clear guidance which may bring certainty to developers and enhance the provision of this service in Lewisham. 3,4,5,6 – No direct impact identified 7, 8, 9 – There are minor negative effects associated with the car travel promoted by this option. 10,11,13,14,17 – No direct impacts identified 12 – Option promotes good neighbour behaviour. 15, 16 – Good neighbourly approach of this type of development in the community. 18 – Well lit and CCTV provision for community safety/ fear of crime. 19 – Transport provision improves accessibility.
<b>Alternative 1</b> Reliance on the London Plan and Core Strategy	-/+	-/+	0	0	0	0	-	-	-	0	0	?	0	0	?	?	0	?	0	Guidance on mini cab and tax office development is not explicitly provided by the Core Strategy Policies in the borough. This alternative has similar impacts as Option 20, however provides less certainty in the implementation for developers.
<b>CLIMATE CHANGE AND ENVIRONMENTAL MANAGEMENT</b>																				
<b>Sustainable Design and Construction</b>																				
<b>Option 21</b> 1. The Council will require all developments to maximise the incorporation of passive design measures to manage heat gain and deliver passive cooling using the following hierarchy: a). passive solar design to optimise energy gain and reduce the need for heating, b). passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat, c). mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical	+/-	+/-	+	+	0	+	+	0	++	+	!	!/-	++	+	+	0	0	0	0	1, 2 - More stringent controls may restrict opportunities for economic development in the short term, although indirect social and environmental benefits associated with sustainable design are likely to lead to economic growth in the long term. 3, BREEAM domestic refurbishment /non domestic should include waste reduction during refurbishment, however good design for operation needs to be considered. 4, - Likely to have long term benefits in terms of reducing waste / resource use.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>cooling followed by air conditioning, and</p> <p>d). full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.</p> <p>2. For conversions to residential from other uses, the Council will require cost effective and proportional energy efficiency measures to be carried out where feasible to a value not exceeding 10% of the overall construction costs.</p> <p>3. For minor residential extensions, the Council will seek to deliver the highest BREEAM standard provision possible for the new part and will encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.</p> <p>4. For non-residential extensions and conversions, the Council will seek to deliver the highest BREEAM standard provision possible for both the new and existing parts of the development. Evidence will be required to justify the standard proposed.</p> <p>5. In relation to Core Strategy Policy 8 bullet 4, where industrial (B2 and B8) uses cannot achieve a minimum of BREEAM 'Excellent' standard, the Council will ensure that a minimum of 'Very Good' is achieved, scoring the maximum BREEAM points possible.</p>																				<p>5 - No impact identified.</p> <p>6 - Achieving required BREEAM and CSH ratings is likely to require some biodiversity enhancement.</p> <p>7 - Probable long term improvement in air quality and noise impacts. Possible short term adverse effects on air / noise pollution during construction.</p> <p>8 - No impact identified.</p> <p>9, 10 - Sustainable design and technologies will help to adapt to and mitigate for climate change and reduce flooding.</p> <p>11 - Probable long term positive effects on the landscape (encourages 'greening') although potential conflict of interests with maintaining townscapes. Long term effects depend on implementation.</p> <p>12 - Historical assets may not able to incorporate sustainable design principles.</p> <p>13 - Housing incorporating sustainable design and meeting BREEAM / CSH standards are likely to provide decent homes for all.</p> <p>14, 15 - Long term benefits for health due to improvements in air quality and general well-being. Potential for increased inequality if sustainable design only promoted within wealthier parts of the population.</p> <p>16, 17, 18, 19 - No impact identified.</p>
<p><b>Alternative 1</b></p> <p>Relying on Building Regulations, the London Plan, London Plan Sustainable design and construction SPG (2006) and the Mayor's Climate Change Mitigation and Energy Strategy (2011)</p>	-	+/-	+	+	+	+	+	0	+	++	0/-	-	-	+	0	0	0	0	0	<p><b>Assessment results from the SA of the CS Policy 8:</b></p> <p>Positive impacts if implemented effectively will help in improving design, construction and life of buildings through the CSH and BREEAM standards. Environmental performance will be improved and carbon emissions from buildings reduced. The policy focus is on reducing CO2. Negative impacts in terms of housing provision, economic growth and the protection of the historic environment as higher environmental standards often restrict opportunities for growth and development by placing greater restrictions on what types of development are feasible and permissible. Similarly, the incorporation of renewable energy within existing buildings can often be at the detriment of the historic</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				environment. These negative effects can be mitigated against by using viability assessments to determine whether expectations in relation to higher environmental standards for particular schemes (taking into account other constraints) are reasonable. Also, energy efficient measures can be introduced without compromising the intrinsic value of listed buildings through a careful process of understanding the building, its capacity for adaptation and use of imaginative solutions.
<b>Alternative 2:</b> For Part 3 of the Policy Option, do not encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.	+/	+	-/	-/	0	0	+	0	+	+	-	+/	+/	+/-	0	0	0	0	0	This alternative is likely to have similar effects as for Option21, however without BREEAM requirements this alternative only meets building regulations and does not seek to promote other sustainable design.
<b>Air Quality</b>																				
<b>Option 22</b> 1. The Council will only grant planning permission for developments that have the potential to impact on air quality to submit an Air Quality Impact Assessment (AQIA) considering the potential impacts of pollution from individual and cumulative development on the site and on neighbouring areas and detailing any appropriate mitigation measures that would reduce exposure to acceptable levels. 2. Applications for planning permission for all new development proposals that have the potential to impact on air quality in an Air Quality Management Area (AQMA) ) will not be permitted to include a biomass boiler.	+/-	+/-	0	+/-	0	+	++	0	+	0	+	+	0	+	0	0	0	0	0	1, 2 - Improving air quality will make Lewisham more attractive which in the long term will be beneficial to economic development, however dependency on fossil fuels will remain which in the long term is set to become more expensive. 3 No impact identified. 4 – This will lead to continued reliance on fossil fuels, however reducing and maintaining air quality will be positive to natural resources such as water and biodiversity. 5 - No impact identified. 6 – Positive to natural resources 7 - Long term positive effects on air quality. 8 - No impact identified. 9 - Improvement in air quality likely to have long term indirect positive effect on climate change adaptation and mitigation. 10 - No impact identified. 11, 12 - Possible long term reduction in corrosive effects of air quality. 13 – No impact identified 14 - Long term benefits for health due to improvements in air quality. 15, 16, 17, 18, 19 - No impact identified.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<b>Alternative 1</b> Reliance on London Plan and Core Strategy policies rather than a separate DMLP policy.	+/l	l	+/l	+		l	+/l	0	0	0	0	+	l	+/l	0	0	0	0	0	<b>Assessment results from the SA of the CS Policy 9:</b> "Positive impacts to health and economic activity, however implementation crucial to success"
<b>Open Space and Biodiversity</b>																				
<b>Option 23</b> 1. The Council will require all new development to: a). take full account of appropriate Lewisham and London Biodiversity Action Plans in development design and ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity. b). use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Institute of Ecology and Environmental Management [IEEM]. The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value. 2. New living roofs are required to be designed and fitted by a qualified and accredited installer and include an extensive substrate base, except where it can be demonstrated that such a base is not feasible and achievable. Developers are required to provide a Living Roofs Management and Maintenance Plan for the first 5 years to demonstrate the ecological impact of the living roof and how it will be monitored and maintained. 3. Artificial grass sport pitches are required to be delivered on hard surfaces and previously developed land rather than on existing natural grass, wherever feasible. Applicants should give consideration to the potential loss of open space, the effect on drainage and surface water flooding and the impact of the pitch, lighting and use on the amenity of the adjacent areas.	-/+	0	0	0	++	++	+	0	+	+	+	0	0	+	+	+	0	+	+	1 - May restrict opportunities for economic development although likely to enhance the desirability of Lewisham as a place to live and work 2 – Green roof maintenance 3 - No impact identified. 4 – Positive to, cooling urban areas, reducing use of natural resources 5, 6 - Long term positive effects on biodiversity and open spaces. 7 - Long term indirect positive effects in terms of air quality. Enhanced green areas also provide buffers to noise. 8 - No impact identified. 9, 10, 11 - Long term indirect positive effects for climate change and flood adaptation and mitigation - particular with reference to green roofs. Flood risk addressed in 3. 12, 13 - No impact identified. 14 - Long term benefits for health and well-being due to improvements in air quality and 'greening' of the neighbourhoods. 15, 16 - Improved biodiversity and open spaces will have long term indirect benefits for the community, with parks, nature reserves providing educational opportunities. 17 - No impact identified 18, 19 - Long term direct benefits for social cohesion and access to leisure facilities.
<b>Alternative 1</b> Relying on London Plan and Core Strategy policies and other guidance rather than a separate DMLP policy.	0	l	0	0	++	++	+/0	0	+	0/+	+	0	l	+	0/+	0	0	+	+	<b>Assessment results from the SA of the CS Policy 12:</b> "Positive sustainability impacts, particularly in terms of protecting existing habitats and contributing to biodiversity. This policy would also help to promote healthy

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
																				communities by retaining space for leisure pursuits, which would also help to facilitate social cohesion. Open spaces can help in mitigate climate change and improve air quality. Could have some conflicts with other land uses such as employment or housing due to limited land availability. With increasing population growth, there is a pressure on existing open spaces and per capita of open space needs to be monitored. Mitigation measures can include providing open space onsite for larger developments and improving connectivity through large sites, particularly in Deptford and New Cross."	
<b>Landscaping and Trees</b>																					
<b>Option 24</b> 1. Applicants for all major development and, where appropriate, non-major development will be required to submit a Landscape Scheme, proportionate to the size of the development, containing: a). a Landscape Plan for areas not occupied by buildings that takes note of the relevant site features and indicates those that are to be retained, including trees and the presence of any species of nature conservation interest, b). details of all enabling work required to ensure the implementation of the Landscape Plan, c). an enforceable 5 year Landscape Management Plan detailing the provision, management and maintenance of quality hard and soft landscapes and trees. 2. Applicants for all major development and, where appropriate, non-major development (and always when there is a Tree Preservation Order in place) will be required to: a). submit an Arboricultural Survey carried out by an appropriate, competent person, in line with BS5837. b). retain existing trees for the most part and in the event of tree removal, replacement planting will normally be required. New and replacement tree planting must use an appropriate species that reflects the existing biodiversity in the borough.	+/-	0	0	+	+	+	+	0	+	+	+	0	+	+	0	0	0	0	0	0	1 - May restrict opportunities for economic development although likely to enhance the desirability of Lewisham as a place to live and work. 2, 3 - No impact identified. 4 – Positive to, cooling urban areas, reducing use of natural resources 5, 6 - Long term positive effects on biodiversity and open spaces. 7 - Long term indirect positive effects in terms of air quality. Enhanced green areas also provide buffers to noise. 8 - No impact identified. 9, 10, 11 - Long term indirect positive effects for climate change and flood adaptation and mitigation. Positive impact on landscape and townscape. 12 - No impact identified. 13 – No impacts identified 14 - Long term benefits for health and well-being due to improvements in air quality and 'greening' of housing developments and neighbourhoods. 15, 16, 17, 18, 19 - No impact identified.
<b>Alternative 1</b> Reliance on the London Plan and Core Strategy, the GLA's Trees and Woodland	0	I	0	0	++	++	+/0	0	+	0/+	+	0	I	+	0/+	0	0	+	+	<b>Assessment results from the SA of the CS Policy 12:</b> "Positive sustainability impacts, particularly	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
Strategies SPG (Draft April 2012), the Mayor's Biodiversity Strategy – Connecting with Nature (2002), Lewisham Biodiversity Action Plan and Lewisham Tree Strategy																				<i>in terms of protecting existing habitats and contributing to biodiversity. This policy would also help to promote healthy communities by retaining space for leisure pursuits, which would also help to facilitate social cohesion. Open spaces can help in mitigate climate change and improve air quality. Could have some conflicts with other land uses such as employment or housing due to limited land availability. With increasing population growth, there is a pressure on existing open spaces and per capita of open space needs to be monitored. Mitigation measures can include providing open space onsite for larger developments and improving connectivity through large sites, particularly in Deptford and New Cross."</i>
<b>Noise and Vibration</b>																				
<p><b>Option 25</b></p> <p>1. The Council will require:</p> <p>a). noise and/or vibration generating development or equipment to be located in the Strategic Industrial Locations and Local Employment Locations as shown on the Local Plan Policies Map,</p> <p>b). new noise sensitive developments are to be located away from existing or planned sources of noise pollution, except if it can be demonstrated through design or mitigation that:</p> <p>i). internal and external noise levels can be satisfactorily controlled and managed by the noise sensitive development; and</p> <p>ii). there will be no adverse impact on the continued operation of any existing or proposed business or operation.</p> <p>c). a Noise and Vibration Assessment for noise and/or vibration generating development or equipment and new noise sensitive development, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken.</p> <p>2. The Council will designate, safeguard, protect and enhance tranquil open space by refusing planning permission for development that will affect a tranquil area, as identified in Table 2.1, by increasing the predicted traffic</p>	+/-	+/-	0	0	+	+	++	0	0	0	+	+	+	+	+	0	0	0	0	<p>1, 2 - May restrict opportunities for economic development in the short term, although reduced noise and vibration will make Lewisham a more desirable place to live and work in the long term leading to associated economic benefits..</p> <p>3, 4 - No impact identified.</p> <p>5, 6 - Long term positive effects on biodiversity and open spaces.</p> <p>7 - Long term indirect positive effects in terms of air quality. Enhanced green areas also provide buffers to noise.</p> <p>8, 9, 10 - No impact identified.</p> <p>11, 12 - Long term indirect positive effects for landscape and townscape. Reduction in vibration may also benefit historical assets.</p> <p>13, 14 - Long term benefits for health and well-being due to reduction in noise disturbance. Contributes towards living in a decent home.</p> <p>15, 16, 17, 18, 19 - No impact identified.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
noise levels over 55 dB Leq (day), unless noise screening, barriers and natural sound features mitigate and offset the impact.																					
<b>Alternative 1</b> Reliance on the London Plan and Core Strategy, the Mayor's Ambient Noise Strategy (2004) and Lewisham's Control of pollution and noise from demolition and construction sites code of practice (2008)	-	-	0	0	+/l	+/l	+/l	0	0	0	0	0	0	+/l	+/l	0	0	0	0	0	There is a limited policy detail in the London Plan and Core Strategy with which to guide noise and vibration management and reduction within Lewisham. The Mayors Ambient noise strategy is relatively comprehensive although it is lacking in detail which is specifically relevant to Lewisham. Lewisham's Control of pollution and noise from Demolition and Construction document, whilst applicable and comprehensive, focuses solely on reducing noise arising from construction and does not address other sources of noise and vibration production within the borough. Furthermore, alternative 1 relies on a large volume of other information and documents. This may make implementation of the alternative cumbersome as well as difficult to monitor. It may also discourage developers and frustrate the promotion of enhanced landscapes and retention of trees within Lewisham.
<b>Lighting</b>																					
<b>Option 26</b> The Council will require applicants to protect local character, residential amenity and the wider public, biodiversity and wildlife from light pollution and nuisance, by: a). taking appropriate measures in lighting design and installation in line with the Institute of Lighting Professionals' Guidance Notes for the Reduction of Obstructive Light (2011) to control the level of illumination, glare, spillage of light, angle and hours of operation, b). using energy efficient and solar powered lighting for energy conservation where feasible, c). providing sensitive lighting for footpaths, cycling paths and public parking areas in the development with particular consideration of the potential adverse impact on biodiversity, d). preventing the adverse impact of light pollution at all stages of development, from building demolition and construction to occupation.	+/-	0	0	-	+	++	0	0	0	0	+	0	0	+	+	0	++	0	0	0	1 - May restrict opportunities for economic development in the short term, but will promote accessible areas in the long term. 2, 3 - No impact identified. 4 - Will increase energy use 5, 6 - Long term positive effects on biodiversity and open spaces. 7, 8, 9, 10 - No impact identified. 11 - Long term direct positive effects for landscape and townscape. 12, 13 - No impact identified. 14 - Reduction in light pollution may lead to greater well-being and improvement in health. 15, 16, - No impact identified. 17 - Lighting design should consider resident safety in design and provide sufficient lighting to discourage crime and nuisance. 18, 19 - No impact identified.
<b>Alternative 1</b>	?	0	0	?	?	?	0	0	0	0	?	0	0	?	?	0	?	0	0	0	There is limited policy detail in the London

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
Reliance on the London Plan and Core Strategy policies rather than a DMLP Policy																				Plan and Core Strategy with which to guide light management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage light pollution and sensitive lighting within the borough.
<b>Contaminated Land</b>																				
<p><b>Option 27</b></p> <p>1. The Council will require applicants to comply with the following step approach to minimise and mitigate any harmful effects to human health and the environment by requiring an appropriate level of Land Contamination Assessment. This is applicable wherever development is proposed on contaminated land, land suspected of being contaminated, or if a sensitive use is proposed to ensure contamination is properly addressed. Applicants are required to:</p> <p>a). complete a Preliminary Risk Assessment, consisting of a desk top study and site walkover report that shows all previous and existing uses of the site and adjacent land, and which assesses what the potential contamination risks to identified receptors are,</p> <p>b). undertake a Site Intrusive Investigation, where necessary, to provide sufficient information to characterise the site and provide for a detailed assessment of the risks to all receptors that may be affected, including those off site,</p> <p>c). obtain a Remediation Strategy, where contamination exists, for the Council's approval to deal with the identified hazards to ecosystems, humans, property and controlled waters and subsequent management and monitoring arrangements,</p> <p>d). submit a Verification Plan for any remediation works, completed by a suitably qualified person that would be fully implemented and verified before occupation of the site to ensure effective measures would be taken to treat, contain or control the contamination in order to protect:</p> <p>i. the occupiers of development and neighbouring land uses,</p> <p>ii. the structural integrity of new and existing buildings and</p> <p>iii. any watercourse, water body or aquifer.</p> <p>e). submit a Verification Report, before</p>																				<p>1, 2 - May restrict opportunities for economic development.</p> <p>3 - Promotes remediation and management of waste.</p> <p>4 - Promotes the brownfield sites.</p> <p>5, 6, 7 - Opportunity for long term remediation and enhancement of contaminated land for biodiversity and amenity, and to improve air quality.</p> <p>8 - No impact identified.</p> <p>9, 10 - Opportunity for long term adaptation to climate change and flood risk - better functioning natural systems.</p> <p>11 - Opportunity to enhance landscapes.</p> <p>12 - No impact identified.</p> <p>13, 14, 15 - Opportunity for long term benefits to health and well-being through promotion of better living environments.</p> <p>16, 17, 18, 19 - No impact identified.</p>
	--	--	+	+	+	+	+	0	+	+	+	0	+	+	+	0	0	0	0	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
occupation of the site, demonstrating completion and validation of works set out in the approved Remediation Strategy and the effectiveness of the remediation, for approval in writing by the Council. The report shall include results of sampling and monitoring carried out in accordance with the approved Verification Plan to demonstrate that the site remediation criteria have been met.																				
<b>Alternative 1</b> Reliance on the London Plan and Core Strategy	?	?	?	?	?	?	?	0	?	?	?	0	?	?	?	0	0	?	?	There is limited policy detail in the London Plan and Core Strategy with which to guide contaminated land management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage contaminated land within the borough.
<b>TRANSPORT</b>																				
<b>Car Parking</b>																				
<b>Option 28</b> The Council will require parking standards in accordance with Core Strategy Policy 14. 2. Car limited development will only be considered where there is: a). PTAL level 4 or higher, or where this can be achieved through investment in transport infrastructure and services, b). no detrimental impact on the provision of on-street parking in the vicinity, c). no negative impact on the safety and suitability of access and servicing, d). protection of required publicly accessible or business use car parking, e). inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site car parking provision, f). an equitable split of parking provision between private and affordable residential development, g). on-site accessible priority parking for disabled drivers. 3. Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street car parking. 4. Wheelchair accessible car parking is required to be provided in accordance with best	+/-	0	0	+	0	0	++	++	+	0	+	0	0	+	+	0	0	0	+	1 – Reduced car use will decrease congestion across Lewisham leading to an improvement in the town centre environment. This will encourage business and promote long term economic growth. Possible adverse effects for the economy if car limited development deemed to be less accessible to the public. 2, 3 – No impact identified. 4 - Encourages sustainable modes of travel. Likely long term positive effects for resource use. 5, 6 - No impact identified 7, 8 - Promotes sustainable modes of travel which will reduce car use and improve air quality. 9 - Reduced car use will contribute to climate change adaptation. 10 - No impact identified 11 - Reduction in congestions within towns is likely to have long term benefits for the aesthetic appeal of the townscape. 12, 13 - No impact identified. 14 - Improvement in air quality is likely to have long term benefits for health and wellbeing of the local population. 15 - Policy considers accessible parking for all. 16, 17, 18 - No impact identified.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>practice standards.</p> <p>5. All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed. Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.</p> <p>6. Applicants will be required to negotiate appropriate provision of parking for motorcycles.</p>																				19 - Promotes accessible parking and access to community facilities by public transport.	
<p><b>Alternative 1</b></p> <p>Allowing car limited development for those sites located within PTAL level 3 or higher.</p>	+/-	0	0	+	0	0	++	++	+	0	+	0	0	+	-	0	0	0	-	<p>1 - Reduction in congestion across Lewisham and improvement in town centre environment will encourage business and promote long term economic growth.</p> <p>2, 3 – No impact identified.</p> <p>4 - Encourages sustainable modes of travel. Likely long term positive effects for resource use.</p> <p>5, 6 - No impact identified</p> <p>7, 8 - Promotes sustainable modes of travel which will reduce car travel and improve air quality.</p> <p>9 - Reduced car use will contribute to climate change adaptation.</p> <p>11 - Reduction in congestions within towns is likely to have long term benefits for the aesthetic appeal of the townscape.</p> <p>10, 12, 13 - No impact identified.</p> <p>14 - Improvement in air quality is likely to have long term benefits for health and wellbeing of the local population.</p> <p>15 – Likely to reduce the accessibility of sites to certain sections of the community.</p> <p>16, 17, 18 - No impact identified.</p> <p>19 – May reduce the accessibility to sites.</p>	
<p><b>Alternative 2</b></p> <p>Relying on the London Plan Core Strategy policies rather than a separate DMLP policy.</p>	+	+	0	0/+	+	+	++	++	+	0	0/+	0	+	0	0	0	0	0	+	+/0	<p><b>Assessment results from the SA of the CS Policy 14</b></p> <p><i>“Positive sustainability impacts, particularly in terms of reducing reliance on private motorised transport and the associated benefit that this would have on air quality and healthy communities. The promotion of public transport would also help to tackle social exclusion by providing a transportation option which is accessible to all. Accessibility improvements will help to contribute to economic growth. The</i></p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				movement of freight will be reliant on implementation to reduce negative impacts on river quality and local air quality."
<b>PROMOTING GOOD DESIGN</b>																				
<b>Urban design and local character</b>																				
<p><b>Option 29</b></p> <p>General Principles</p> <p>1. The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met. This policy option is supported by various Supplementary Planning Guidance Documents as referenced in the Core Strategy.</p> <p>2. Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in the Lewisham Character Study.</p> <p>3. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and where appropriate should influence the future character of new development and the development of a sense of place. If necessary the value and significance as a heritage asset will be assessed as part of any development proposal.</p> <p>4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.</p> <p>Detailed design issues</p> <p>5. Development applications will also be required to address the following detailed matters in the Design and Access Statement to demonstrate the required site-specific design response:</p> <p>a). how the development will establish a satisfactory relationship to the existing townscape, natural landscape, open spaces and topography to preserve and/or create an urban form which contributes to local</p>																				<p>1, 2- Could restrict development in the short term, however in the long term the urban environment will be improved to create an urban space that will benefit the local economy.</p> <p>3 – construction waste will be produced</p> <p>4 – Materials may not be able to be sourced locally</p> <p>5 – positive to existing urban character</p> <p>6 – positive to existing urban character and enhancement is promoted</p> <p>7 – positive to improving the urban environment which includes</p> <p>8 - positive to good accessible urban design infrastructure, positive to encourage walking and cycle, thus reducing car dependency</p> <p>9, 10 – positive to climate mitigation, adaptation and flood risk</p> <p>11, 12 – Promotes protection and enhancement of landscape and the historic environment</p> <p>13 - No impact identified</p> <p>14, 15 – good urban design will increase accessibility and reduce health inequalities.</p> <p>16 – No impact identified</p> <p>17 - Promotes passive surveillance</p> <p>18 , 19 positive to social cohesion and increasing access to services</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>distinctiveness such as plot widths, building features and uses, roofscape, open space and views and vistas taking all available opportunities for enhancement</p> <p>b). height, scale and mass in relation to the surrounding built context</p> <p>c). layout and access arrangements, which must avoid large areas of parking and servicing uninterrupted by landscaping</p> <p>d). how the scheme relates to the scale and alignment of the existing street including its building frontages</p> <p>e). the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities and the public transport network, including meeting the needs of disabled and older people and people with young children</p> <p>f). the quality and durability of building materials and their sensitive use in relation to the context of the development. The context in which they are used should be considered sensitively. Materials used should be high quality and either may match or complement existing development and the reasons for the choice of materials should be clearly justified in relations to the existing built context</p> <p>g). details of degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials</p> <p>h). how the development at ground floor level will provide visual interest for the public including to the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain</p> <p>i). new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8</p>																					
<p><b>Alternative 1</b></p> <p>Provide a simple, criteria based policy as well as Supplementary Planning Documents (SPD's) and/or Neighbourhood Plans</p>	+/-	+/-	-	-	+	++	+	++	++	++	++	++	0	++	++	0	++	++	++		<p>The alternative is likely to offer similar positive and negative effects when compared to Option 31. Neighbourhood plans and supplementary guidance may offer more focussed guidance for specific neighbourhoods although there is potential for land-use and character conflicts if not implemented carefully.</p> <p>This option would not necessarily conflict</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
																				with the above option as the area based material would be transferred into Neighbourhood Plans and/or Supplementary Planning Documents, however there is an additional cost for the L.A with the implementation of this alternative.	
<b>Alternative 2</b> Reliance on the London Plan and Core Strategy	+	0	0	-/I	I	0	I	+/I	I	I	++	++	0	0/+	0	0	0	0	+/0	0	<b>Assessment results from the SA of the CS Policy 15</b> <i>'Positive impacts likely to enhance the townscape and character of the borough. Likely to contribute to community wellbeing. Objectives such as open space, biodiversity, climate change, flooding and transport are dependent on effective design and implementation. Improve links to heritage assets and local character.'</i>
<b>Alterations and extensions to existing buildings including residential extensions</b>																					
<b>Option 30</b> 1. Development proposals for alterations and extensions, including roof extensions will be required to be of a high site specific, sensitive design quality and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, porches etc., and use high quality matching or complementary materials sensitively in relation to the context. New rooms provided by extensions to residential buildings will be required to meet the space standards in Policy Option 31 Housing Design, layout and space standards. 2. In addition, where it is necessary: a). side extensions should normally be set back from the main building line to allow for a clear break between existing buildings and the new work to maintain architectural subordination to the original building. b). Rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope. Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building. c). residential extensions, roof terraces and balconies and non-residential extensions adjacent to residential dwellings should result in no appreciable loss of privacy and amenity	-	0	0	-	0	0	-	0	0	-	++	++	0	0	0	0	0	0	0	0	1 – Presents constraints to development 2, 3 – No impact identified. 4 – May conflict with sustainable design. 5, 6 – No impact identified. 7 - Possible short term adverse impact as materials may not be available locally – increased transport related effects on air quality. 8 – No impact identified 9 – Possible short term adverse impact as materials may not be available locally – increased transport related impacts. 10 – No impact identified. 11, 12 – Maintains and protects townscape and cultural heritage assets. 13, 14, 15, 16, 17, 18, 19, 20 – No impact identified.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments		
<p>(including sunlight and daylight) for adjoining houses and their back gardens. Residential extensions should retain an accessible and usable private garden that is appropriate in size in relation to the size of the property, and retain 50% of the garden area.</p> <p>d). additional or enlarged windows, doors etc. should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows, where controllable by the Council, should closely match the pattern of the original windows. The repair of original windows will be encouraged.</p> <p>e). details of plant, pipework, fire escapes, lifts and other mechanical equipment including ducts and flues should be included within the initial planning application and be enclosed within the envelope of the building or, where that is impracticable, sited where they will have the least visual impact</p> <p>3. Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area.</p> <p>4. Where the roofline or party walls are exposed to long views from public spaces and where a roof extension in any form would have an obtrusive impact on that view will not be permitted.</p>																						
<p><b>Alternative 1</b></p> <p>Use of Supplementary Planning Documents (SPD) and other general policies within the DM</p>	-	-	0	-	0	0	-	0	0	-	++	++	0	0	0	0	0	0	0	0	0	It is likely that Alternative 1 will have similar positive and negative outcomes to Option 32. Additional/supplementary planning documentation may provide greater clarity on issues relating to implementation of the policy.
<p><b>Alternative 2</b></p> <p>Provide a greater level of details in the current DM, negating the need for Supplementary Planning Guidance</p>	-	0	0	-	0	0	-	0	0	-	++	++	0	0	0	0	0	0	0	0	0	It is likely that Alternative 2 will have similar positive and negative outcomes to Option 32.
<p><b>Alternative 3</b></p> <p>Reliance on the London Plan and Core Strategy</p>	+	-	0	-/l	l	0	l	+/l	l	l	++	++	0	0/+	0	0	0	0	+/0	0	<p><b>Assessment results from the SA of the CS Policy 15</b></p> <p><i>'Positive impacts likely to enhance the townscape and character of the borough. Likely to contribute to community wellbeing. Objectives such as open space, biodiversity, climate change, flooding and transport are dependent on effective design and implementation. Improve links to heritage assets and local character.'</i></p>	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				CS Policy 15 is not directly applicable to the aims of Option 32. It is likely that reliance on the CS will be less successful at achieving the aims set out in Option 32.
<b>Housing design, layout and space standards</b>																				
<b>Option 33</b>																				
Siting and Layout of development																				
<p>1. The siting and layout of new build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.</p> <p>2. New build housing development will be required to be:</p> <p>a). sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment. Table 2.3 Sustainable Residential Quality Matrix will be used to assess the appropriate density of development in relation to public transport accessibility and character areas</p> <p>b). provided with a readily accessible, secure, private and usable external space suitable for children's play.</p> <p>c). designed so that that schemes in mixed tenure do not distinguish visually between public and private housing provision either in terms of quality of materials and design, or in level of amenities</p> <p>d). designed to be safe and secure and reduce crime and the fear of crime.</p> <p>3. The South East London Housing Partnership Wheelchair Homes Design Guidelines (or as subsequently amended) will be used to assess whether new build housing schemes meet Lifetime Homes and Wheelchair Housing Standards both in terms of internal layout and the external design features needed to ensure houses are accessible to their users.</p> <p>Internal Standards</p> <p>4. The London Plan and the London Plan Housing Supplementary Planning Guidance will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals</p>																				
	+/-	0	0	0	+	0	+/-	++	+	0	++	+	++	+	+	0	++	+	++	<p>1 - Competition for land use will occur, although high quality housing will encourage people to live and work within Lewisham.</p> <p>2, 3,4 - No impact identified</p> <p>5 - Policy seeks to provide sufficient amenity areas for residents</p> <p>6 - No impact identified</p> <p>7 - Promotes sensitive locating of properties to reduce noise and locating near public transport - potential long term improvement in air quality. Short term increase in noise and reduction in air quality during construction.</p> <p>8 - Promotes accessible housing - close to public transport.</p> <p>9 - Promotes accessible housing - close to public transport and promotes passive solar heating.</p> <p>10 - No impact identified.</p> <p>11, 12 - Considers sensitive placement and consideration of surrounding character.</p> <p>13, 14, 15 - Promotes quality housing across a range of tenures and considers Lifetime Homes.</p> <p>16 - No impact identified</p> <p>17, 18, 19 - Promotes sensitive placement to reduce crime/fear of crime and improve accessibility - both of which will improve social cohesion.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>provide accommodation that meet the following criteria:</p> <p>a). meet the minimum space standards for new development (including any flat conversions allowed under Option 3) meet the standards which should conform with the standards in the London Plan and the London Plan Supplementary Planning Guidance on Housing (as updated).</p> <p>b). habitable rooms and kitchens and bathrooms are required to have a minimum floor height of 2.5 m between finished floor level and finished ceiling level. Space that does not meet this standard will not count towards meeting the internal floor area standards</p> <p>c). provide accommodation of a good size, a good outlook, with acceptable shape and layout of rooms, with main habitable rooms receiving direct sunlight and daylight. Single aspect dwellings will not usually be considered acceptable. Residential units provided should normally be dual aspect. Any single aspect dwellings provided will require a detailed justification as to why a dual aspect dwelling is not possible and a detailed demonstration that adequate lighting and ventilation can be achieved.</p> <p>d). family housing (dwellings with three or more bedrooms) should be designed to have the potential to separate dining and living accommodation from the kitchen area in order to ensure privacy for the occupants</p> <p>e). studio flats (one person dwellings at GIA 37 sq. m.) will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations.</p> <p>f). include sufficient space for storage and utility purposes in addition to the minimum space standards.</p>																					
<p><b>Alternative 1</b></p> <p>Producing Supplementary Planning Documents and using less detailed policy in the DM</p>	+/-	0	0	0	+	0	+/-	++	+	0	++	+	++	+	+	0	++	+	++	<p>It is likely that reliance of the SPD will have similar outcomes to Option 33. Supplementary/more detailed planning guidance may however result in more effective implementation of the policy aims.</p>	
<p><b>Alternative 2</b></p> <p>Reliance on the London Plan and Core Strategy</p>	+	0	0	-/l	l	0	l	+/l	l	l	++	++	0	0/+	0	0	0	0	+/0	0	<p><b>Assessment results from the SA of the CS Policy 15</b></p> <p><i>‘Positive impacts likely to enhance the townscape and character of the borough. Likely to contribute to community</i></p>





Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
residential development and private back gardens and f). provide adequate privacy for the new development.																					
<b>Alternative1</b> Reliance on the General Principles detailed in DM Policy Option 31	+	0	0	0	?	?	0	0	+	+	++	+	0	0	0	0	0	0	0	?	Option 31, is a general policy which does not relate specifically to this type of development. While the aim of Option 29 is generally positive (requiring developments to attain a high quality of design), reliance on it rather than Option 34 has the potential to dilute the positive gains for the economy, biodiversity, local character etc., as are detailed above. It is therefore likely that implementation of Option 34 would offer greater clarity and socio-economic and environment benefits.
<b>Thames Policy Area and Deptford Creekside</b>																					
<b>Option 35</b> New development within the Thames Policy Area or on sites adjacent to Deptford Creek will need to, where appropriate, improve the relationship of the River Thames or Deptford Creek with the local context, by: a). maintaining and improving the relationships of local views, existing visual links and physical connections, landmarks, recreational facilities, listed buildings and the archaeological heritage with the river or creek b). providing a mixture of uses on sites to be developed adjacent to the river or creek c). addressing the river or creek as an important part of the public realm, and contribute to the liveliness of the waterfront by providing a mixture of uses including where appropriate the inclusion of public uses on the ground floor of buildings along the Thames Path. d). encouraging river-related and marine uses where appropriate in line with other policies in the Plan e). maintaining and where appropriate enhancing the appearance and nature conservation interest of the river corridor including the river or creek walls and foreshore f). resisting encroachment in to the river or creek its foreshore and g). maintaining the stability of the flood defences, and examining opportunities to retreat the flood defences to increase flood																					1, 2 - Encourages mixed use development and aesthetic and environmental improvement of the area. 3, 4 - Increased development in this area may result in greater waste production and resource use. 5, 6 - Promotes aesthetic improvement as well as enhancements for wildlife. 7 - Possible short term adverse effects on air and noise quality during construction. 8 - Promotes improvement of physical connections to the river. 9, 10 - Promotes measures to reduce flood risk and adapt to climate change. 11, 12 - Promotes maintenance and enhancement of townscape and historical assets. 13 - No impact identified 14, 15 - Promotes improvements in living environments and accessibility. Long term positives for health and social inclusion. 16 - No impact identified. 17, 18, 19 - Improvement and enhancement of the Thames Path area likely to reduce crime and improve accessibility making for a more socially cohesive society.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
storage, wildlife and aesthetic value and visual connections with the river or creek.																					
<b>Alternative 1</b> Rely on the Core Strategy: There are no appropriate or justifiable alternative options for this policy in view of the policy framework set out in the London Plan and the Lewisham Core Strategy.	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	There is limited policy detail in the London Plan and Core Strategy with which to guide development in the Thames area within Lewisham. This could result in the area being left undeveloped which could have a number of long term adverse effects for the economy, environment and society.
<b>Public Realm and street furniture</b>																					
<b>Option 34</b> 1. Public spaces should be designed to be safe, inclusive, accessible, attractive and robust, enhancing existing connections and providing new connections as appropriate. The provision of public art will be encouraged. The Council will require street paving and furniture, public art and street signage to: a). be well designed using high quality materials b). harmonise with the street scene c). be sited to minimise visual clutter d). allow level and safe passage for all including people with disabilities including the careful design of shared surfaces with cyclists 2. Trees are an important part of the street scene and should be accommodated wherever possible and carefully sited in line with the above principles. 3. In Conservation Areas the Council will seek to ensure that street furniture and paving is compatible with the character of the area. 4. The Council will seek the preservation of historic street furniture and other non-designated heritage assets that are of value to the local street scene.	+	0	0	-	+	+	0	+	-	0	++	++	0	0	0	0	0	0	0	+	1 - Potential long term positive effects for employment as policy promotes a favourable living/working environment in Lewisham. 2, 3 - No impact identified. 4 – Materials will need to sourced and transported to site. Adverse effects for resource use. 5 - Promotes enhanced open spaces in Lewisham. 6 - Use of trees as street furniture is promoted. 7 - No impact identified 8 - Promotes sensibly places street furniture which does not impede safe passage and access for the disabled. 9 – Potential adverse effects if materials are not sourced locally. Transportation of materials likely to contribute to climate change. 10 - No impact identified 11, 12 - Seeks to protect and enhance the townscape's street furniture and protect historical street furniture assets. 13, 14, 15, 16, 17, 18 - No impact identified. 19 - Promotes sensibly placed street furniture which does not impede safe passage and access for the disabled.
<b>Alternative 1</b> Reliance on the Lewisham Streetscape Guide and Core Strategy	+	0	0	0	+	+	0	+	0	0	++	++	0	0	0	0	0	0	0	?	Reliance only on the Lewisham Streetscape Guide and CS is likely to have similar positive and adverse effects to Option 39. The Lewisham Streetscape Guide is very detailed and provides good guidance on streetscape design within Lewisham. It is likely that implementation of Option 38 in conjunction with the use of

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
																					the guidance, will bring about the greatest benefits to the Lewisham streetscape.
<b>Listed Buildings and Conservation Areas and Other Designated Heritage Assets</b>																					
<p><b>Option 35</b> New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens</p> <p>A. General principles</p> <p>1. For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.</p> <p>2. Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.</p> <p>3. The Council encourages the adaptation of historic buildings to improve energy efficiency in line with the detailed guidance provided by English Heritage. Careful consideration should be given to the most appropriate options for insulation, power use and power generation. Intrusive interventions, such as externally mounted micro-generation equipment or external wall insulation, should be avoided where these would unacceptably alter the character and appearance of the heritage asset. The Council encourages the retention and thermal upgrading of historic windows.</p> <p>B. Conservation areas</p> <p>1. The Council having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving and enhancing their character and appearance, will not grant planning permission where:</p> <p>a). new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials</p> <p>b). development, which in isolation would lead to less than substantial harm to the building or area, but would cumulatively adversely affect</p>	+/-	0	+	-	0	+	0	0	I	I	++	++	0	+/-	+/-	0	0	0	0	<p>1 - Potential to constrain development opportunities. However, likely to improve the attractiveness of Lewisham as a place to live and work.</p> <p>2. No impact identified</p> <p>3 - May result in a reduction in building waste.</p> <p>4 - May result in few buildings being retrofitted for energy efficiency resulting in greater resource use.</p> <p>5 - No impact identified.</p> <p>6 - Potential indirect benefits for bats utilising old building for roosting.</p> <p>7, 8 - No impact identified.</p> <p>9, 10 - Historic buildings are less likely to meet building standards for climate change adaptation and flood risk management.</p> <p>11, 12 - Promotes maintenance and enhancement of townscape and historical assets.</p> <p>13 - No impact identified.</p> <p>14, 15 - May entrench inequalities as building of new, affordable housing is restricted due to retention of historical assets. Older buildings may not meet Homes for Life standards etc. However, may protect existing residential homes from changes of use.</p> <p>16, 17, 18, 19 - No impact identified.</p>	



Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
Government regulation. Planning permission will be refused which adversely affects their sites or settings.  2. When considering the impact of a development proposal on Registered Parks and Gardens in Lewisham, the Council will consider that any loss or substantial harm to these assets will be in wholly exceptional circumstances. The Council will apply the provision in Clause 2 of the above policy to the assets.																					
<b>Alternative 1</b> Relying on the CS  No alternative options to this policy are realistically considered appropriate in the light of the Council's duties under the planning legislation.	+	0	0	I/-	I	0	I	+/I	I	I	++	++	0	+/0	0	0	0	0	+/0	0	<b>Assessment results from the SA of the CS Policy 16:</b>  "The policy will contribute to maintaining or enhancing heritage assets and the historic environment of the borough".  Although the CS mentions a number of conservation areas within Lewisham and promotes the protection and enhancement of these areas, there is far less detail in the CS policy. Option 35 is more detailed and prescriptive and is therefore likely to be more successful at implementation.
<b>Non designated heritage assets including Locally Listed Buildings , Areas of Special Local Character and Assets of Archaeological Interest</b>																					
<b>Option 36</b> A. General principles 1. The Council will protect the local distinctiveness of the borough by sustaining and enhancing the significance of non-designated heritage assets. 2. Development proposals affecting non-designated heritage assets should be accompanied by a heritage statement proportionate to the significance of the asset which justifies the changes to the asset. 3. Non-designated heritage assets may be identified during the development management process. B. Locally listed buildings 1. The Council will seek to ensure and encourage the conservation and enhancement of locally listed buildings and structures, and use its powers to protect their character, significance and contribution made by their setting where appropriate. 2. The Council will generally resist the demolition of locally listed buildings and expect applicants to give due consideration to retaining and incorporating them in any new	+/-	0	0	-	0	+	0	0	I	I	++	++	0	+/-	+/-	0	0	0	0	0	1 - Potential to constrain development opportunities. However, likely to improve the attractiveness of Lewisham as a place to live and work. 2, 3 - No impact identified. 4 - May result in few buildings being retrofitted for energy efficiency resulting in greater resource use. 5 - No impact identified. 6 - Potential indirect benefits for bats utilising old building for roosting. 7, 8 - No impact identified. 9, 10 - Historic buildings are less likely to meet building standards for climate change adaptation and flood risk management. 11, 12 - Promotes maintenance and enhancement of townscape and historical assets. 13 - No impact identified. 14, 15 - May entrench inequalities as building of new, affordable housing is restricted due to retention of historical assets. Older buildings may not meet

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>development.</p> <p>C. Areas of special local character</p> <p>1. Development in areas of special local character should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas.</p> <p>2. The Council will resist demolition of unlisted buildings in areas of special local character where these contribute to architectural and townscape merit and local distinctiveness of the area.</p> <p>D. Non designated heritage assets of archaeological interest</p> <p>1. The Council will ensure that non designated heritage assets of archaeological interest that are demonstrably of equivalent significance to schedule monuments will be considered subject to the policies for designated heritage assets.</p> <p>2. The conservation, protection and enhancement of the archaeological heritage of the borough will be promoted through:</p> <p>a). Requirements to assess and plan for the archaeological implications of development proposals that may affect the archaeological heritage of a site which may require preliminary archaeological site evaluations. Proposals on sites within Areas of Archaeological Priority as shown on the Proposals Map should be accompanied by an evaluation. Evaluations should be commissioned from professionally qualified archaeological organisations or consultants.</p> <p>b). Ensuring development proposals safeguard archaeological sites and seeking to ensure that where justified important archaeological remains are where possible permanently preserved in situ with public access, display and where appropriate given statutory protection.</p> <p>c). Where permanent preservation is not justified the remains are investigated recorded and subsequently published by a recognised archaeological organisation prior to the start of development.</p> <p>d). Where remains unexpectedly come to light seeking ensure their preservation or their recording in consultation with the applicant.</p>																				<p>Homes for Life standards etc.</p> <p>16, 17, 18, 19 - No impact identified.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<b>Alternative 1</b> Reliance on the Core Strategy	+	0	0	I/-	I	0	I	+/I	I	I	++	++	0	+/0	0	0	0	0	+/0	0	<b>Assessment results from the SA of the CS Policy 16:</b>  <i>"The policy will contribute to maintaining or enhancing heritage assets and the historic environment of the borough".</i>  Reliance on the CS is likely to have similar positive and adverse effects to Option 41. The key difference is that Option 41 is prescriptive and detailed towards the needs of Lewisham and therefore is likely to have greater success at implementation.
<b>Demolition or substantial harm to designated and non-designated heritage assets</b>																					
<b>Option 37</b> Proposals for the demolition or substantial harm to a heritage asset will only be considered under exceptional circumstances where the public benefits outweighs the loss of, or harm to, the asset. The Council will require applicants to demonstrate that there is no practical way of realising the benefits without demolishing the building or causing substantial harm.  2. Where demolition is proposed, the following will be taken into account: a). The significance of the asset, architecturally, historically, contextually; and any communal value b). The condition of the asset and the economic viability of its repair and re-use c). The adequacy of marketing efforts made to retain the asset in use d). The adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership e). The public benefits of any alternative proposal for the site.  3. Development proposals involving substantial structural alterations to a heritage asset need to demonstrate that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.  4. Where demolition is proposed on grounds that a building's condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably qualified conservation professional and must describe, explain and illustrate the structural problems,	-/+	0	0	+/I	+/I	0	0	-/I	0	0	0	-	-/+	0	0	0	0	0	0	0	1 – Restrictions for developers, however clear criteria for development. 2, 3 – No impacts identified 4, 5 – Retention of old building stock may reduce waste generation. 6, 7 – No impacts identified 8 – 9, 10, 11 – No impacts identified 12 – Loss of heritage assets 14, 15, 16, 17, 18, 19 – No impacts identified.

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
<p>and discuss repair options.</p> <p>5. Where repair is not economically viable, the Council will require full supporting evidence, for example</p> <p>a). A valuation of the existing building and site</p> <p>b). A full survey identifying the repairs required</p> <p>c). Development costs including a costed schedule of repairs</p> <p>d). An estimate of the value of the repaired property, including potential yields</p> <p>e). Evidence that the property has been marketed for a reasonable period at a price reflecting its condition</p> <p>Where there is evidence of deliberate neglect or damage to a heritage asset, the deteriorated state of the asset will not be taken into account in the Council's decision</p> <p>6. Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.</p> <p>7. Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development.</p>																					
<p><b>Alternative 1:</b> Reliance on the London Plan and Core Strategy</p>	-/+	0	0	+/!	+/!	0	0	-/!	0	0	0	-	-/+	0	0	0	0	0	0	0	<p>Reliance on the London Plan and Core Strategy is likely to have similar positive and adverse effects to DM Policy Option 37. The key difference being that DM Policy Option 37 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.</p>
<p><b>Alternative 2:</b> Reliance on the NPPF and on the Companion Guide to the PPS5</p>	-/+	0	0	+/!	+/!	0	0	-/!	0	0	0	-	-/+	0	0	0	0	0	0	0	<p>Reliance on the NPPF and Companion Guide to PPS5 is likely to have similar positive and adverse effects to DM Policy Option 37. The key difference being that DM Policy Option 37 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.</p>
<b>Domestic satellite dishes and other telecommunications equipment</b>																					

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p><b>Option 38</b></p> <p>Domestic Satellite Dishes and Telecommunications Equipment</p> <p>1. Satellite dishes and other telecommunications equipment should always be designed and sited where they will have the least detrimental visual impact, in particular not on a principal street frontage. They should also not be detrimental to the character of Conservation Areas, Listed buildings and other designated and non designated heritage assets or to the amenities of a residential area. This will usually entail permitting not more than one satellite dish per building and resisting visually harmful development in respect of premises subject to an Article 4 Direction.</p> <p>2. In carrying out this Policy the Council will:</p> <p>a). encourage the provision of communal telecommunications equipment in new development and rehabilitation schemes and where time limited consents have been granted and</p> <p>b). encourage the removal or upgrading of older telecommunications equipment in order to minimise visual impact.</p> <p>Radio and Telecommunications Masts and Infrastructure</p> <p>1. In the case of development proposals for radio and telecommunications masts, including for prior approval under Part 24 of the General Permitted Development Order, these should be supported by the necessary evidence to justify the proposed development. The Council will seek to ensure, in conjunction with operators and developers that in each case the best possible environmental and operational solution is arrived at. This will include:</p> <p>a). provision of evidence that the possibility of erecting antennae on an existing building, structure, or mast site has been explored, and/or in the case of a new mast or base station that the cumulative exposure when operational will not exceed International Commission in non-ionising radiation protection guidelines</p> <p>b). in the case of site sharing provision of evidence that the site can accommodate any additional apparatus required</p> <p>c). Use of design that minimises the size of or camouflages telecommunications apparatus</p>	0	0	-	-	+	0	0	0	0	0	0	++	++	+	0	0	0	0	0	<p>1, 2 - No impact identified</p> <p>3, 4 - Encourages the replacement/upgrade of older equipment to new - may result in increased production of waste and use of resources.</p> <p>5 - Promotes sensitive use and placement of infrastructures - reduces intrusion into open spaces.</p> <p>6, 7, 8, 9, 10, 11 - No impact identified.</p> <p>12, 13 - Likely to protect and enhance the townscape and cultural heritage assets.</p> <p>14 - Potential to enhance landscapes and townscapes and result in more attractive living environments for people.</p> <p>15, 16, 17, 18, 19 - No Impact identified.</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
d). Provision of evidence that new telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or other national services requiring radio communications  e) Provision of evidence on the outcome of consultations with organisations with an interest in any proposed development particularly where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site.																					
<b>Alternative 1</b> Reliance on Guidance within the NPPF.	0	0	-	-	+/l	0	0	0	0	0	0	++	++	+/l	0	0	0	0	0	0	Reliance on the NPPF and legislation is likely to have similar positive and adverse effects to Option 38. The key difference is that Option 38 is prescriptive and detailed towards the needs of Lewisham and therefore is likely to have greater clarity for developers and the Planning Authority at implementation.
<b>Alternative 2</b> Reliance on the London Plan and Core Strategy	0	0	-/l	-/l	+/l	0	0	0	0	0	0	+/l	+/l	+/l	0	0	0	0	0	0	Would lead to much greater uncertainty over the considerations and restrictions to the development of telecommunications equipment in Lewisham. This alternative would not have the same beneficial impacts as the policy option and does not provide the implementation certainty for this type of development.
<b>Public Conveniences</b>																					
<b>Option 39</b> The Council will expect new developments which attract large numbers of visitors/customers to make adequate provision for public conveniences, which are well located and signed in relation to pedestrian flows, car parks, public transport and other public places and are accessible for all.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+/l	+/l	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 – No direct impact identified 15, 16 – provisions of public conveniences may improve the health and wellbeing of the local population and promote social inclusion. 17 – No direct impact identified 18, 19 – Sensible implementation may lead to positive effects on anti-social behaviour and accessibility to community infrastructure.	
<b>Alternative 1:</b> Use floorspaces in the policy to identify minimum requirements	-/l	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0	+/l	+/l	This alternative is likely to have similar impacts as per DM Policy Option 39, however, whilst this alternative may provide greater detail for developers in implementing this policy option, the inclusion of specific floorspaces for minimum requirements may lead to unnecessary restrictions on development within Lewisham. This may have indirect impacts on economic growth within the	

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments	
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<b>Alternative 2</b> Reliance on the London Plan and Core Strategy	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	0	1		There are very similar positive and adverse effects as in DM Policy Option 39, however as public conveniences are not specifically referenced in Core Strategy policies, this alternative is unlikely to provide the detail and certainty to ensure this public infrastructure is development to the benefit of the Lewisham community.
<b>COMMUNITY SERVICES</b>																					
<b>Innovative community facility provision</b>																					
<b>Option 40</b> The Council will encourage the use of innovative solutions to the provision of community meeting space including: 1. The potential for new or extended schools to make usable community, sports and leisure space accessible to local people outside of teaching hours. 2. The temporary use of vacant or unused inside and outside space for community uses, where it is able to provide a safe and appropriate environment and there is no detriment to local amenity.	0	0	-	-	0	0	-	-/+	-	-	0	0	0	++	++	0	+	++	++		1, 2 - No impact identified 3 - Possibly negative any new development will incur waste production in the short term and long term through community use 4 - Possibly negative due to use of natural resources 5, 6 - No impact 7 - Possibly negative impacts during construction though only temporary 8 - The location of new facilities will be accessible, however current facilities maybe protected in inaccessible areas 9, 10 - Potential negative impacts if permeable surfaces are lost 11, 12, 13, 16 - No impact 14, 15 - The use of school facilities and protection and enhancement of community facilities will be positive to health inequalities and assist with reducing deprivation 17 - Positive – safety consideration is an aspect for this policy and Use of vacant and unused space will also be positive to crime reduction 18 - Positive to community 19 - Should improve access to community facilities
<b>Alternative 1</b> Reliance on the Core Strategy	0	0	-	-	0	0	-	-/+	-	-	0	+	0	+	0	+	+	+	+		The Core Strategy approach is positive towards protecting community facilities; however more detail will strengthen the policy.
<b>Nurseries and Childcare</b>																					
<b>Option 41</b>	-	-	-	-	0	0	+	+	-	-	-	-	0	0	?	+	+	+	++		1, 2 - Competition for land use may occur

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>1. Applications for day nurseries and facilities for the care, recreation and education of children will be required to consider:</p> <p>a). the acceptability of the loss of the existing use,</p> <p>b). traffic volumes and the effect on congestion,</p> <p>c). accessibility by walking, cycling and public transport,</p> <p>d). Access, egress, cross-site movement and parking / drop off areas, including for disabled users,</p> <p>e). the impact on local residential amenity, including noise.</p>																				<p>3 - Possibly negative any new development will incur waste production in the short term and long term through community use</p> <p>4 - Possibly negative due to use of natural resources</p> <p>5, 6 - No impact</p> <p>7 - Policy seeks to limit noise impacts. noise impacts</p> <p>8 - Sustainable transport is promoted</p> <p>9, 10 - Potential negative impacts if permeable surfaces are lost</p> <p>11, 12 - May result in loss of heritage assets</p> <p>13, 14 - No impact</p> <p>15 - Day nurseries need to be located in areas of need, easily accessible to all</p> <p>16 - Positive to skills and training</p> <p>17 - Positive – safety consideration is an aspect for this policy</p> <p>18 - Positive to community</p> <p>19 - Should improve access to community facilities</p>
<p><b>Alternative 1</b> Reliance on the Core Strategy</p>	I	I	-	-	0	0	-	+	-	-	-	-	0	0	?	+	+	+	++	As above, although the policy seeks to limit adverse impacts on local amenity so the detailed policy should reduce adverse impacts
<b>Art, culture and entertainment facilities</b>																				

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Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>1. New or extended art, culture and entertainment uses (including commercial uses) will be encouraged where there is no unacceptable impact on local amenity.</p> <p>2. Existing art, culture and entertainment uses will be protected. Re-development of such sites will only be allowed where there is re-provision in another form / location.</p>	++	++	-	-	0	0	+	+	-	-	-	-	0	0	+	+	++	++	++	<p>1, 2 - Protection of existing facilities and provision of new facilities will be beneficial to economic growth of a variety of sectors.</p> <p>3, 4 - Waste and natural resource use will increase</p> <p>5, 6 - No impact identified</p> <p>7, 8 - Positive to protection of amenity</p> <p>9, 10 - Potential negative impacts if permeable</p> <p>11, 12 - May result in loss of heritage assets</p> <p>13, 14 - No impact identified</p> <p>15, 16 - Policy encourages art, culture and entertainment uses, positive to social inclusion, education, skills and raining</p> <p>17, 18 - no unacceptable impact on local amenity within the policy will result in a positive impact community</p> <p>19 - Existed facilities will be protected</p>
<p><b>Alternative 1</b> Reliance on the Core Strategy</p>	+	+	-	-	0	0	+	+	-	-	-	-	0	0	+	+	+	+	+	<p>The policy within the Core Strategy seeks to ensure a range of health, education, policing, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. However DM Policy Option 42 includes a greater emphasis on the prevention of negative impacts on local amenity than this alternative.</p>
<p><b>Alternative 2</b> Locate facilities in existing town centres only.</p>	+	+	-	-	0	0	-	-	-	-	-	-	0	0	-	-	+/-	+/-	+/-	<p>1, 2 - Protection of existing facilities and provision of new facilities will be beneficial to economic growth of a variety of sectors.</p> <p>3, 4 - Waste and natural resource use will increase</p> <p>5, 6 - No impact identified</p> <p>7, 8 - Impacts on air and noise and vibration will be concentrated in one area, therefore the impact will be negative to town centres</p> <p>9, 10 - Potential negative impacts if permeable surfaces are lost</p> <p>11, 12 - May result in loss of heritage assets</p> <p>13, 14 - No impact identified</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
																				<p>15, 16 - Policy encourages art, culture and entertainment uses, however concentration in town centre areas will not promote social inclusion</p> <p>17, 18 - Concentration of facilities in town centre areas is likely to increase anti-social behaviour and not promote social cohesion</p> <p>19 - Facilities will be provided however these may not be accessible to all</p>
<p><b>Alternative 3</b> Allow redevelopment of art, culture and entertainment facilities to other commercial uses</p>	++	++	-	-	0	0	-	-	-	-	-	-	0	0	--	--	0	--	--	<p>1, 2 - Policy will benefit other commercial sectors only</p> <p>3, 4 - Waste and natural resource use will increase</p> <p>5, 6 - No impact identified</p> <p>7, 8 - Protection of amenity is not promoted</p> <p>9, 10 - Potential negative impacts if permeable surfaces are lost</p> <p>11, 12 - May result in loss of heritage assets</p> <p>13, 14 - No impact identified</p> <p>16 - Policy will allow the loss of these facilities, and will not promote social inclusion</p> <p>17 - No impact identified</p> <p>18 - negative impact community</p> <p>19 - Policy will allow the loss of these facilities, this is likely to result in loss of culture and arts within the borough and will not promote social inclusion</p>
<b>Places of Worship</b>																				
<p><b>Option 43</b> 1. The Council's preferred locations for the development of public places of worship are the network of major and district town centres as defined in Core Strategy Policy 6.</p> <p>2. Proposals for development in the major and district town centres and all other areas will only be considered in locations that are:</p> <p>a). highly accessible to users through public transport and cycling and walking routes</p> <p>b). able to provide an adequate level of parking</p> <p>3. All applications for places of worship will be required to:</p> <p>a). demonstrate they are not causing a detrimental affect to employment or future</p>	+	+	-	-	0	0	+	-/+	+	+	+	+	0	++	++	0	0	++	++	<p>1, 2 - Employment land will be protected</p> <p>3 - Possibly negative any new development will occur waste production in the short term and long term through community use</p> <p>4 - Possibly negative due to use of natural resources</p> <p>5, 6 - No impact identified</p> <p>6, 7 - Possibly negative impacts during construction</p> <p>8 - The location of new facilities will be accessible, however policy does not make reference to protection of existing places of worship</p> <p>9, 10, 11, 12 - Policy promotes highest quality design therefore impacts should be positive</p>

Policy	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	Comments
<p>employment space,</p> <p>b). demonstrate that there will be no detrimental affect on local amenity through noise, hours of operation or any other environmental impacts,</p> <p>c). provide a travel plan to show that the points detailed in Part 1 of this option and other transport issues can be mitigated,</p> <p>d). be delivered to the highest design standards.</p> <p>4. Existing places of worship that meet the criteria above will be protected from redevelopment.</p>																				<p>13 - No impact</p> <p>14, 15 - The community facilities will be positive to health inequalities and assist with reducing deprivation</p> <p>16, 17 - No Impact</p> <p>18, 19 - Positive to community cohesion</p>
<p><b>Alternative 1</b> Allow provision only in edge of town centre locations.</p>	+	+	-	-	0	0	-	-/+	+	+	+	+	0	+	+	0	0	+	+	<p>Allowing provision only in edge of town centre locations, will not promote social cohesion due to location restrictions.</p> <p>Other negative impacts identified were the impacts on congestion and air quality if locations were not accessible by a range of sustainable transport options.</p>
<p><b>Alternative 2</b> Rely on the London Plan and the Core Strategy</p>	+	+	-	-	0	0	-	-/+	-/+	-/+	-/+	-/+	0	+	+	0	0	+	+	<p>As above with the exception of the following:</p> <p>7 - Access by public transport is not promoted, therefore air quality is likely to decrease further</p> <p>8, 9, 10, 11, 12 - High quality design and accessibility by public transport are not promoted</p>

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