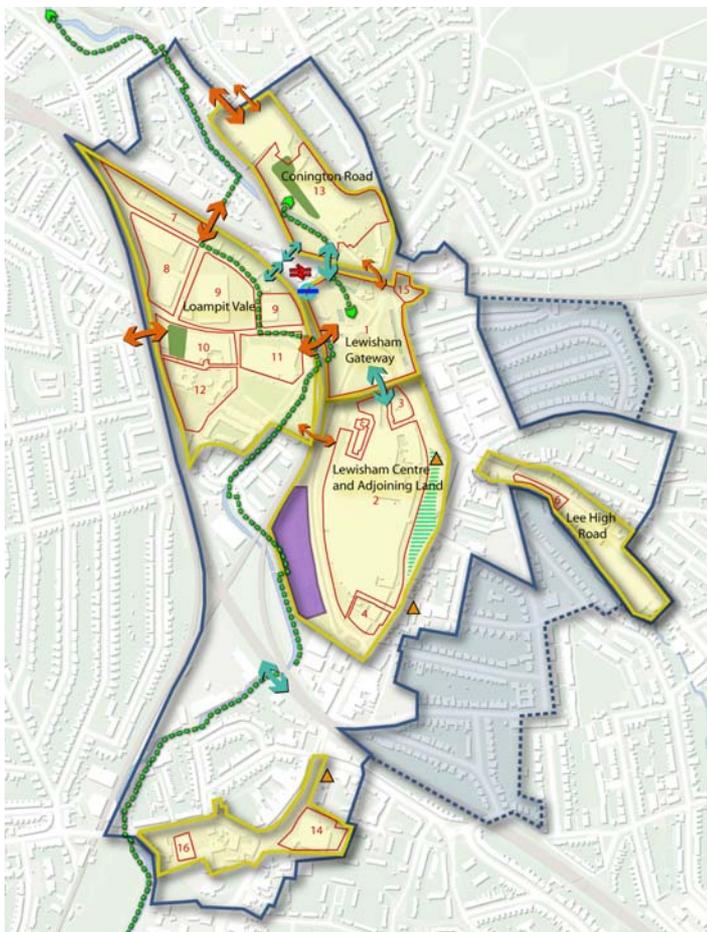


# Sustainability appraisal and strategic environmental assessment

Lewisham Town Centre Area Action Plan - Further Options Report  
March 2011

Copy for public consultation





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## Non-technical summary

This section is a non-technical summary of the Sustainability Appraisal and Strategic Environmental Assessment (SA) of the Lewisham Town Centre Area Action Plan (AAP) Further Options Report. It summarises the stages of the SA process, provides a statement of likely significant effects arising from the proposals contained in the AAP and shows how the process has made a difference to date. This SA report should also be read in conjunction with the SA produced for the Preferred Options Town Centre AAP in April 2007, as information from this report has not been reproduced here, but is still referred to, and relevant in places.

### **What is a sustainability appraisal?**

Government legislation requires the Council to carry out a Sustainability Appraisal (SA) of all the documents which make up the Local Development Framework (LDF). The Lewisham Town Centre AAP document is technically known as a development plan document (DPD) and is a key LDF document in identifying and designating land in Lewisham Town Centre for particular uses (such as housing, retail, employment, education, or a mix of uses) building on the regeneration and growth agenda for the area set out in the Core Strategy. The Core Strategy is the main town planning strategy for Lewisham and sets out the vision, objectives and policies to guide development and change in Lewisham over the next 15 years. The purpose of a SA is to make sure that all the things which are referred to as sustainability issues such as using public transport not the private car, the impact of flooding or climate change, or the pressures placed on open space from an increasing population, are taken into account when preparing the AAP. The idea is that once adopted, the DPD will be the most sustainable that can be put forward as it will have taken into account all the sustainability issues as part of the process of preparation. In addition to the Government's requirement for SA, the Council is required under European Directive to undertake a Strategic Environmental Assessment (SEA) of new plans. Government guidance considers it appropriate to combine both assessments through a single approach. The Council's report therefore integrates both SA and SEA and is referred to by the single term 'sustainability appraisal'.

The SA:

- assesses the broader sustainability impacts of the emerging AAP
- shows how sustainability and sustainable development was defined and understood for the purposes of this assessment
- minimises the negative impacts associated with the emerging AAP while putting forward ways to enhance the benefits that could be achieved.

Sustainability Appraisal is not a precise science. It involves a balance of value judgements about how the environment we live in should look and function. While some people may place a high value on the quality of the natural environment, others may strive for a healthy economy or a strong sense of community. It is the Council's task to find a balance between these sometimes conflicting goals.

## Progress so far

The government has set out the methodology to carry out the SA process in good practice guidance and identifies the following stages:

Stage A Setting the context and objectives, establishing the baseline and deciding on scope

Stage B Developing and refining options and assessing effects

Stage C Preparing the SA report

Stage D Consulting on the preferred options of the DPD and the SA report

Stage E Adoption and monitoring plans

This SA report for the Site Allocations Further Options Report reflects Stage B. Since the good practice guide was published in 2005 the government has revised the rules for producing a DPD. The new rules are set out in a publication called *Planning Policy Statement 12 Local Spatial Planning* (PPS12) published in June 2008. This has changed Stage D so that this stage now relates to a SA for a draft plan (or proposed submission version). Importantly, the SA methodology reflects the Plan Making Manual, which considers the updated PPS12.

Lewisham Town Centre AAP Further Options report and its sustainability appraisal  
The following objectives have been derived utilising the results of the review of policy, programmes and objectives. The objectives have been organised by theme, to ensure that the AAP covers the full scope of issues and topics defined by statutory documents in the planning framework and contextual strategic documents. The amended objectives will then feed into the Issues/Options phase and the parallel Sustainability Appraisal process

The following **key area objectives for the plan** have been proposed, as follows:

- **Objective 1 - Retail and town centre status:** To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace
- **Objective 2 - Housing:** To deliver up to 2,300 additional new homes by 2016 and a further 800 additional new homes by 2021 to create a sustainable and mixed community of private and affordable housing in line with the Core Strategy with highest densities focused in locations with the highest level of accessibility.
- **Objective 3: Sustainable Design:** To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, enable people to easily make environmentally aware choices and are carefully phased and co-ordinated to create a cohesive place and a sustainable community.
- **Objective 4 – Employment and training:** To maximise job opportunities by retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

- **Objective 5 - Open space/recreation:** To encourage healthy lifestyles through the maintenance, protection and improvement of the supply of publicly accessible open space (including public realm and the town centre streetscape), and incorporation of additional recreational and open space as part of new developments.
- **Objective 6 - Transport:** To encourage patterns of development which support walking, cycling and the use of public transport, reduces the need for private car travel, maintains and where possible improves the high levels of public transport accessibility of the town centre and knits the centre in with the surrounding area.
- **Objective 7 - Environment:** To protect and enhance the Rivers Quaggy and Ravensbourne and ensure that the town centre can mitigate and adapt to the risks arising from climate change by focusing on protecting the area against extreme weather conditions, mitigating heat island effects and delivering energy efficient and low carbon development.
- **Objective 8 - Community:** To create a place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, community and leisure facilities that keep pace with proposed growth.
- **Objective 9 - Implementing and monitoring the AAP:** To ensure that partners in the public, private and third sectors continue to work together to ensure that the forecast growth in the town centre is carefully monitored, managed and delivered throughout the plan period.

The **sustainability appraisal objectives** have been tailored to reflect local concerns as well as national and regional issues. The sustainability appraisal framework may also serve as the basis for monitoring eventual implementation of the Area Action Plan.

The proposed sustainability appraisal objectives are as follows:

Ref	Topic	Sustainability Appraisal Objectives
<b>Social</b>		
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities
Soc5	Historic environment	To protect and enhance heritage assets and utilise the historic environment in the creation of sustainable places
Soc6	Culture	To protect and enhance cultural diversity and promote

Ref	Topic	Sustainability Appraisal Objectives
		community cohesion and civic pride
Soc7	Crime	To reduce crime levels in the town centre and reduce fear of crime
Soc8	Education	To increase access to lifelong learning
Soc9	Social inclusion and deprivation	To improve access to amenities for vulnerable members of the community and reduce poverty and deprivation
Soc10	Road safety	To improve pedestrian safety in the town centre
Soc11	Health	To improve inclusive access to local healthcare facilities and encourage healthy lifestyles through sustainable urban design
Soc12	Noise	To reduce noise from road traffic, construction and industry
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces
<b>Environmental</b>		
Env1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction
Env 2	Flood risk	To reduce and manage the risk and effects of flooding
Env3	Sustainable transport	To reduce dependency on private cars through enhancing pedestrian, cycle and public transport routes throughout the town centre
Env4	Renewable energy	To increase on-site renewable energy provision
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings
Env6	Waste and recycling	To reduce the consumption of materials and resources and the production of waste and increase the amount of waste recycling
Env7	Water use	To provide sustainable sources of water and promote water efficiency
Env8	Air quality	To improve air quality
Env9	Nature conservation	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies
Env10	Maintain and enhance landscapes and townscapes	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape
<b>Sustainable economic growth</b>		

Ref	Topic	Sustainability Appraisal Objectives
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco 3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment and reduce local unemployment

### Key findings

The SA process identified that the AAP was likely to result in a number of social, economic and environmental benefits. The main benefits were in association with the proposals to provide new housing and retail within the town centre. This will contribute positively towards the sustainable economic growth SA objectives and also contribute towards securing additional affordable housing in a location which has excellent public transport links (Lewisham Town Centre has a PTAL score of 6 on average). The AAP policies seek to diversify retail uses and to improve the public realm significantly which will help to make the town centre environmentally and economically resilient in the future.

The town centre is affected by flood risk, with large parts classified as high or medium risk of flooding. Development of new housing within high risk flood areas is proposed as part of the AAP and this conflicts with the SA objective to reduce the risk and effects of flooding (ENV2). However the proposals would have significant regeneration benefits and would help to fulfil Lewisham's wider economic and social objectives, in particular, the achievement of Metropolitan retail status. Lewisham's Sequential Test has indicated that there are no alternate locations for the scale and type of development proposed, therefore exception tests will need to be undertaken to ensure that the final proposals are acceptable in terms of flood risk. The policies also require that flood mitigation measures are included in the design of development and that the Council liaise closely with developers.

Another potential conflict identified was in terms of parking provision. Policies seek to retain the amount of parking for shoppers in the town centre and increase provision in relation to any new retail development. This conflicts with the sustainability objective to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which can differentiate its offer with other nearby competing retail centres, therefore it is considered essential to retain as much parking as possible.

Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However the quality and function of this MOL is limited, and the loss of the land is mitigated through the re-provision of open space. The loss of MOL at

these sites has been considered and appraised in detail as a separate process to this work.

**Statement on the difference the process has made**

The SA process was carried out in parallel to the plan making process (the preparation of the Further Options Report) therefore all findings during this process were integrated into each round of discussion and are reflected in the final version of the FOR AAP report.

By developing and consulting on both the AAP and the SA together, environmental, social and economic considerations have been integrated throughout the process. Given this, the SA has generally confirmed that thinking on sustainability issues is well embedded with the preparation of the AAP. More generally, the SA process has produced substantial benefits in the plan-making process through the further development and assessment of the baseline, identification of indicators and targets and identification of significant benefits.

The SA has highlighted the need for partnership working to improve the provision of infrastructure (physical, social, green), particularly in relation to responding to the needs of the local communities and disadvantaged groups. The need to monitor policies, set targets and identify indicators is an important part of the SA process. This will show whether the wider environment of Lewisham is improving or worsening, and thus enable amendments to be made to AAP policies. One of the overall benefits of integrating the SA process with AAP formulation will be the potential to identify and respond to changes in the wider environment quickly.

### **How to comment on this report**

You can tell us what you think about any part of this Sustainability Appraisal report. Comments must be in writing and can be made in any of the following ways:

#### **Web**

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

<http://consult.lewisham.gov.uk/portal>

OR

#### **E-mail**

[planning@lewisham.gov.uk](mailto:planning@lewisham.gov.uk)

with 'LDF AAP Further Options Report' as the subject.

OR

#### **Post**

Planning Policy  
London Borough of Lewisham  
5th Floor, Laurence House  
1 Catford Road  
Catford, SE6 4SW

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date



# 1. Introduction

This document is the Sustainability Appraisal and the Strategic Environmental Assessment (SA) of the Lewisham Town Centre Area Action Plan (AAP) Further Options Report. The AAP seeks to deliver the vision and strategic objectives identified for the town centre by identifying sites for redevelopment and providing clear policy and guidance for land owners and developers. This SA appraises proposed uses for the key focus areas and includes an appraisal of:

- Objectives
- Area wide spatial policies
- Focus areas

This SA report supplements the SA report produced in April 2007 on the Preferred Options Lewisham Town Centre AAP, and this document should be read in conjunction with this report.

## 1.1. Lewisham Local Development Framework

The preparation of a **Sustainability Appraisal for the emerging Lewisham Town Centre Area Action Plan** is part of the process prior to its development and adoption as a Local Development Document as part of Lewisham's Local Development Framework.

### Local Development Frameworks

Local Development Frameworks (LDFs) were introduced through the 2004 Planning and Compulsory Purchase Act and is a generic term to describe a portfolio of planning documents, prepared by the Council, which collectively will deliver the planning strategy for Lewisham. Area Action Plans, like this one being prepared for Lewisham Town Centre, are Development Plan Documents (DPDs). Development Plan Documents are one of a number of types of Local Development Documents that make up the LDFs. All local authorities must produce a Core Strategy DPD as part of their LDF which sets out the strategic planning direction for the area. Further to this, additional DPDs can be produced to set out policies in more detail. In Lewisham the following documents are being prepared:

- Core Strategy
- Site Allocations DPD
- Development Management Policies DPD
- Area Action Plans for the Lewisham and Catford town centres
- Proposals Map
- Supplementary Planning Documents
- Statement of Community Involvement
- Annual Monitoring Report
- Local Development Scheme

DPDs are subject to consultation during the preparation period and are required to be examined by an independent planning inspector. All DPDs are subject to SA. The Core Strategy forms the principal, overarching LDF document and all other LDF documents must be consistent with it. The Core Strategy sets out the vision, strategic objectives, spatial strategy, cross cutting policies and the delivery and monitoring strategies for the borough, taking into account the requirements of national legislation and policies, and regional statutory requirements, specifically those in the London Plan. The London Borough of Lewisham has been actively engaged in developing its LDF since 2005.

## 1.2. Lewisham Town Centre Area Action Plan

Lewisham Council are preparing an Area Action Plan for Lewisham Town Centre to ensure the forecast growth for the town centre is managed and delivered. Spatial Objective 2 of the emerging Core Strategy sets out the following vision for the town centre:

Lewisham Town Centre will:

- a. Be designated as a Major town centre, and will be further developed so that by 2026 it achieves Metropolitan status on the London-wide retail hierarchy
- b. Accommodate up to 40,000 sq.m of additional retail floor space and 4,300 sq.m of additional leisure floodspace by 2026
- c. Accommodate up to 1,500 additional new homes by 2016 and a further 1,100 additional new homes by 2026 (NB: These figures are currently being revised to reflect the updated Further Options Report findings)
- d. Contain a Local Employment Location (LEL) at Molesworth Street
- e. Be one of the borough's preferred locations for new office development
- f. Contain a strategic development site, the Lewisham Gateway, which will act as a catalyst for regeneration of the town centre.

The AAP is the implementation and delivery plan for the changes that will occur in the town centre during this period. In particular, it will provide a detailed planning and implementation strategy for major opportunity sites within the town centre.

A number of documents and studies set the scene for the preparation of the Lewisham Town Centre Area Action Plan. These include the Lewisham UDP, the emerging Lewisham Core Strategy, the London Plan, the draft replacement London Plan, the Lewisham Gateway SPG and the draft Lewisham Town Centre Development Strategy.

## 1.3. Sustainability Appraisal

The purpose of an SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans.

The Government defines sustainable development as:

- Social progress which meets the needs of everyone;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

The SA of planning documents is intended to achieve the following:

- Form an integral part of all stages of plan preparation;
- Provide a mechanism for ensuring that sustainability objectives are translated into sustainable planning policies and proposals;
- Take a long term view of whether and how the area covered by the plan is expected to develop, taking account of the environmental, social and economic effects of the proposed plan;
- Reflect global, national, regional and local concerns and issues; and
- Provide an audit trail of how the plan has been revised to take into account the findings of the SA.

## 1.4. Strategic Environmental Assessment

The SA of planning documents must also incorporate (where relevant) the requirements of the European Directive 2001/42/EC on the 'assessment of the effects of certain plans and programmes on the environment', commonly referred to as the Strategic Environmental Assessment (SEA) Directive.

SEA focuses exclusively on environmental issues, whilst the broader SA focuses on social and economic issues in addition to environmental issues. Government guidance on undertaking SAs has been prepared so as to accommodate the requirements of the SEA Directive. Consistent with this approach, the preparation of the SA of the emerging Lewisham Area Action Plan DPD will address the requirements of the SEA Directive.

## 1.5. European Habitats Directive

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain whether it would adversely affect the integrity of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects. The Council has carried out this assessment which concludes that the Core Strategy and strategic land allocations, including the vision for Lewisham Town Centre are not likely to have a significant effect on any designated European sites. The AA is contained as Appendix 2 to the SA for the Core Strategy Report.

## 1.6. The Sustainability Appraisal Process

The five key stages of the SA (incorporating SEA) are shown in Figure 1 below.

<i>STAGE &amp; OUTPUT</i>	<i>LINKAGES TO PLAN PREPARATION</i>	<i>PURPOSE</i>
<b><u>STAGE A</u></b> <b>SCOPING REPORT</b>	Formulated alongside the preparation of the evidence base.	Identify relevant plans and programmes; Establishing the baseline; Setting a framework; Deciding on the scope of the appraisal setting objectives and targets; and Identifying issues.
<b><u>STAGE B</u></b> <b>Developing &amp; Refining Options</b>	Formulated alongside the preparation of issues and options.	Refining issues and options for the plan; and Appraise the sustainability of the options.
<b><u>STAGE C</u></b> <b>Draft SA Report</b>	Formulated alongside the preparation of the preferred options. Consultation on both will take place at the same time.	Identify preferred options; Assessing the effects of the plan (economic, social and environmental); and Developing proposals for monitoring the plan.
<b><u>STAGE D</u></b> <b>Final SA Report</b>	Formulated alongside the preparation of the submission version. Consultation on both	Appraising significant changes to the plan arising out of consultation undertaken in Stage C; and

<p><b>STAGE E</b> <b>Annual Monitoring Report</b></p>	<p>will take place at the same time (Stage D).</p> <p>The sustainability of the Site Allocations DPD will be reviewed as part of the Annual Monitoring Report.</p>	<p>The SA to be used as part of determining the 'soundness' of the plan and whether it should be approved or not.</p> <p>Monitoring implementation of the plan.</p>
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**Figure 1. Development Plan Document Preparation Process**

Sustainability appraisal is an ongoing process and to enable it to be effective and worthwhile the appraisal must start early in the plan preparation process. By doing so, sustainability considerations can be effectively factored into the plan from its earliest stages. Two phases and associated consultations have informed this current SA of the Council's Lewisham Town Centre AAP Further Options Report. 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 October 2010. This was subject to the statutory five week consultation period with the statutory consultees. Six replies were received, however two of these offered no specific comments relating to the AAP. The feedback received from the remaining four consultation responses has been incorporated into this SA Report for the Site Allocations Further Options Report. New issues identified as a result of the consultation can be found in Section 6 and in detail in Appendix 4, while the impact upon the sustainability objectives can be seen in Section 7.

An SA/SEA Preferred Options report was produced in 2007 which assessed the 2007 Preferred Options AAP DPD. Work on the AAP was paused to allow for the progression of the Core Strategy. Following this the Council has produced a Further Options AAP report which is an updated version of the AAP and reflects more recent developments in the Core Strategy and on the ground. Therefore this SA report assesses this new report accordingly.

### **1.7. Next steps**

Following the publication of this SA on the Further Options Report for Lewisham Town Centre AAP, the Sustainability Appraisal will inform and develop in step with production of the Area Action Plan as follows:

- Consultation on the revised Sustainability Appraisal (coinciding with consultation on Further Options Report for the Area Action Plan)
- Final Submission version of the Sustainability Appraisal Report
- Consultation on the Submission version of the Sustainability Appraisal Report (coinciding with consultation on the Submission version Area Action Plan)
- Monitoring and Review.

### **1.8. Consultation on the Sustainability Appraisal**

Planning Policy Statement 1 sets out the principles that the Government believes should underpin community involvement in the planning process. It is clear that Sustainability Appraisal should also involve the public and time is built into the process for consultation at each stage.

The SEA Directive gives rise to specific requirements for consultation with the public and stakeholders. It requires authorities to consult "the public affected or likely to be affected by, or having an interest in" a plan. It also gives rise to the requirement that authorities which, because of their social, environmental and economic responsibilities, are likely to be concerned by the effects

of implementing the plan must be consulted on the scope and level of detail of the information to be included in the SA Report.

In the SEA Regulations the Government has designated three consultation bodies as “authorities with environmental responsibility” (or “consultation bodies”), in relation to the SEA Directive:

- English Heritage,
- Natural England, and
- the Environment Agency.

In Lewisham, additional bodies have been designated as “specific consultation bodies” and have therefore been consulted.

The public and the statutory authorities discussed above must be consulted on the plan issues and options – and the sustainability appraisal of these issues and options – at the appropriate time.

As explained in sections 1.3 “Sustainability Appraisal” and 1.4 “Strategic Environmental Assessment”, this document is intended to meet both the requirement for a Sustainability Appraisal and the requirements of the SEA Directive.

### 1.9. Methodology and structure of this report

The Government has set out the methodology and statutory requirements for carrying out the SA process in regulations and an associated guide. This SA has been prepared and structured in accordance with these regulations and guidance. This SA report focuses on the assessment of amended and new policies against the revised sustainability objectives set out in the SA Scoping report. The following scale was used to determine the nature of the impacts of the AAP.

++	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
?	Unknown impact

The impact assessment was qualitative and effects were determined based on professional judgement.

The SA report is structured in the following manner:

**Section 1** provides an introduction and explains the SA process

**Section 2** outlines the context and relevant aspects of the current state of the environment in Lewisham (termed as the ‘baseline’)

**Section 3** sets out the Lewisham Town Centre Vision and Objectives

**Section 4** shows the main plan and programme documents reviewed

**Section 5** summarises issues raised at previous consultations

**Section 6** provides a summary of the key sustainability issues facing the borough

**Section 7** Sustainability Appraisal Objectives

**Section 8** AAP options and alternatives

**Section 9** Appraises the AAP and likely significant effects and includes assessment of options in terms of the likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and synergistic effects on a number of sustainability related matters; measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme. This section also includes cumulative and long term effects

**Section 10** outlines proposals for monitoring

**Section 11** provides information on the next steps.

### **1.10. Difficulties in carrying out the assessment**

Difficulties were encountered in compiling the baseline information and setting the appropriate indicators and targets, as this information was not always available or easy to predict. Much of the baseline information used for this appraisal has been taken from higher level SA reports undertaken for the Core Strategy and Site Allocation Reports. The SA process revealed that there is a lack of monitored data available to establish a baseline of information. Information had to be sourced from a number of locations. The recent update of the Scoping Report has made the baseline information more reliable, however there are still gaps in information available.

## 2. Lewisham Town Centre Context

This section introduces the Lewisham Town Centre area, for which the action plan is being prepared and summarises the strategic and local context. The provision of information detailing the current state of the social, economic and natural environment in the Lewisham Town Centre area constitutes a baseline against which the effects of the AAP can be monitored and is a fundamental part of the Sustainability Appraisal process. Baseline information also provides the basis for predicting the likely environmental effects that may result both if the AAP is or is not implemented. The clear identification of the baseline and likely future trends is essential to the SA process as it facilitates the development of sustainability objectives that can address ways of mitigating against anticipated problems and in developing an effective and transparent monitoring strategy to measure progress in the achievement of effective implementation of the AAP. The following section provides an outline of the current social, environmental and economic baseline characteristics of the area and their likely trends if the AAP is not implemented. A detailed list of the current baseline and associated indicators and trends is provided at appendix 4.

### 2.1. Location

The London Borough of Lewisham covers around 13.4 square miles, located in south east London. It is a vibrant and ethnically diverse borough, home to more than 260,000 people.

The borough is made up of a collection of diverse neighbourhoods and strong communities ensuring that while the borough and its localities develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage. Adjoined by four other London boroughs, Lewisham occupies a key position on important transport routes (radial and orbital) within London and between central London, Kent and Sussex.

Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary. Lewisham, Catford, New Cross and Deptford are identified as opportunity areas in the London Plan and are expected to be able to accommodate substantial new jobs and or homes.

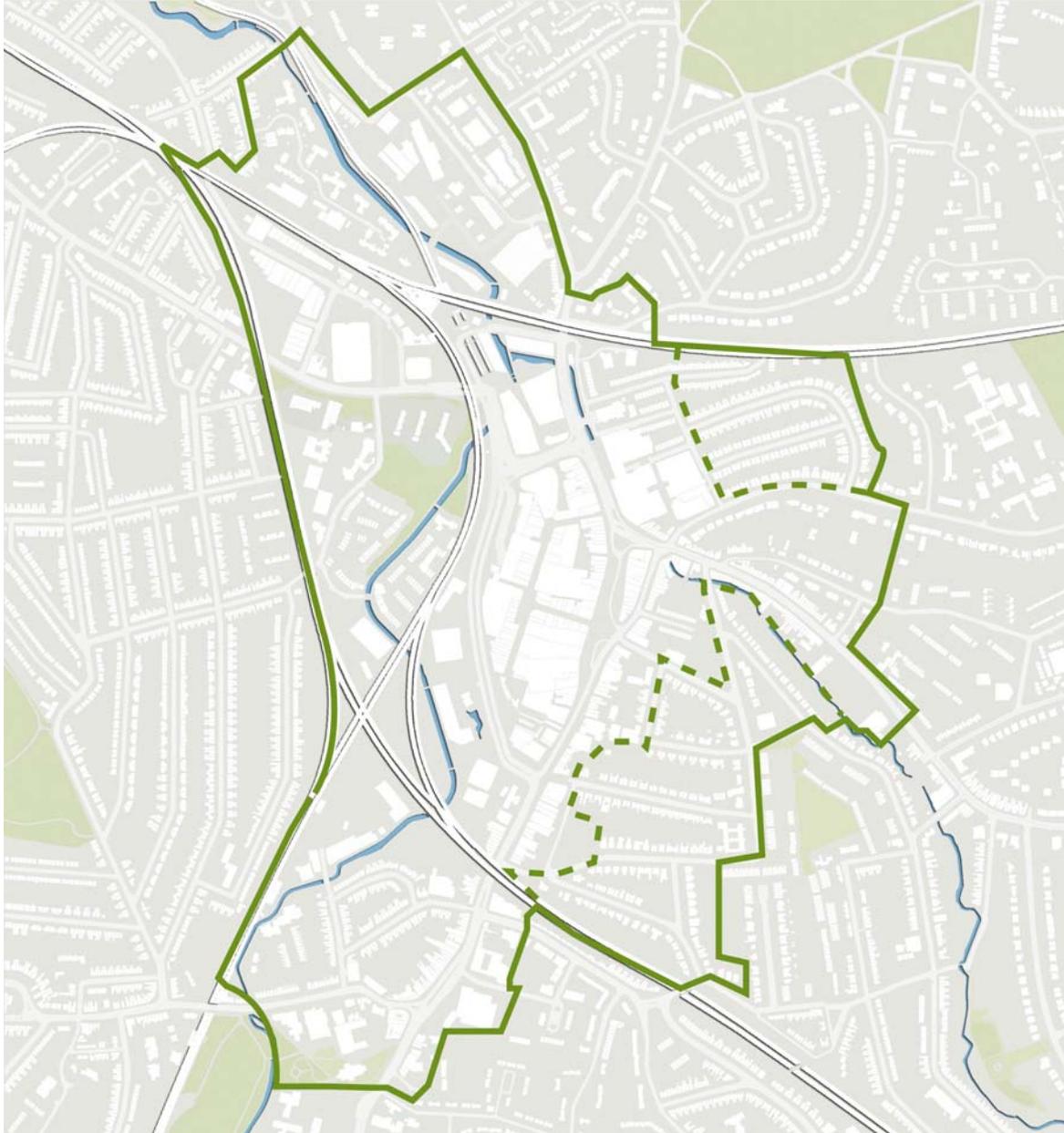
Lewisham Town Centre is especially well connected to central London by rail and the DLR and benefits from high PTAL of 6b and 6a. It has developed as an important dynamic and strategic retail and service hub and is designated as a Major Centre within the London Plan. Lewisham offers a variety of appeal including the historic street market, comparison goods retail in the Riverdale Shopping Centre and independent specialist retail along the Lee High Road. Employment in the town centre is largely split between Distribution, Hotels and Restaurants (largely retail) providing 30% of total jobs, Banking, Finance and Insurance providing 27% and Public Sector (administration, education and health) accounting for 26%.

The Indices of Multiple Deprivation show that the area covering Lewisham town centre is among the 20% most deprived areas within England. While educational and health factors demonstrate a mid-table ranking, the indices relating to crime, environment and those affecting children and old people remain in the bottom quintile.

The borough is the 15th most ethnically diverse local authority in England where 130 different languages are spoken. This diversity is apparent in the town centre with the proportion of the overall population from a black and/or minority ethnic origin at 47%.

The town centre has 3 primary schools within and close to its boundary including Lewisham Bridge Primary School, which is currently being transformed into the Prendergast vale all-through school, and a total of 23 primary schools in the two Primary Places Planning Localities (PPPLs) that cover the town centre. There are also 2 secondary schools nearby which have benefitted from the Building Schools for the Future (BSF) Programme to rebuild or refurbish every secondary school in the borough within the next decade. Health facilities are provided by 6 GP's and 4 dentists close

by and the Lewisham University Hospital located immediately south of the centre providing acute services and a children's centre. In supporting the area Lewisham has a number of community and leisure facilities, while there are also many independent faith group facilities.



. Figure 4: Proposed Area Action Plan boundary

The borough has a wide portfolio of parks and green spaces, whilst within the town centre open space is provided through a mix of green and hard landscaping. Additionally, there is a Site of Importance to Nature Conservation and a number of green corridors that permeate the outskirts of the centre.

The River Ravensbourne and the River Quaggy flow north and west respectively through the town centre surrounds converging adjacent to the railway station and continuing north towards the River Thames. The paths of both rivers are affected at points by culverts and channeling, while other sections accompany open space (including the Waterlink Way). In September 2010 the Council completed a final draft of the River Ravensbourne Corridor Improvement Plan which seeks to support opportunities to enhance the river and provide specific and general design guidance. Large parts of the town centre are at some risk of flooding from these sources as well we from surface water and sewerage flooding.

A number of key historical assets exist in the borough, including two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and conservation areas. In the town centre a number of listed and locally listed buildings exist (including the Grade II The Church of Stephen and the Church of St Saviour and Sts John the Baptist and Evangelist) as well as four conservation areas in or around the town centre (St. Stephen's, Belmont, Mercia Grove and St. Mary's) and several others in the nearby surrounding area. The borough and the town centre has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals. The centre also falls within a wider Area of Archaeological Priority.

## **2.2. Likely trend in the town centre environment without the implementation of the AAP**

The Core Strategy assesses the likely trends in Lewisham if the Core Strategy is not implemented. The effects of the AAP not being implemented are largely similar to that identified for the Core Strategy and therefore a short summary of the effects are provided here only.

### *Socio economic trends*

- The opportunity to boost the economic performance of Lewisham Town Centre is unlikely to be realised without the implementation of the AAP. The Lewisham Gateway scheme is central to the stimulation of the local economy, and as it is a strategic allocation the implications of this development are considered in detail in the Core Strategy SA.
- The AAP provides a coordinated framework and requirements for development that will ensure the best possible development is achieved in the area. Without the AAP development is likely to be piecemeal and would result in an uncoordinated approach.
- The aspiration of securing enough retail floorspace to reach Metropolitan retail status (as defined in the London Plan) is also likely to be unrealised if the AAP is not implemented.
- The AAP policies set out priorities for environmental improvements, improvements to the public realm and social infrastructure requirements which can be secured as part of new developments. Without this policy it is unlikely that the same level of contributions will be able to be secured.

### *Environmental trends*

- The AAP sets out an ambitious approach to energy generation which sets out a framework for creating a local large scale decentralised energy network in the longer term but also short term measures for on-site energy generation. Without this policy framework it is very unlikely that this will be implemented, and the potential to reduce carbon emissions in new development will not be fully realised.
- Opportunities to protect, create and enhance biodiversity habitats in the borough, including naturalising local rivers may not be realised.
- Opportunities for public realm improvements may be lost.
- Opportunities to maximise the efficient use of land and use existing infrastructure better in order to accommodate the projected increase in population will not be realised.

### 3. Lewisham Town Centre Area Action Plan Vision

The Greater London Authority predicts that the overall population of Lewisham is expected to increase by close to a quarter between 2006 and 2031. This represents an additional 64,300 people. The Council, mindful of the above statistic, has a preference for ambitious borough-wide regeneration and growth which could see more than 19,000 new homes in the borough by 2025.

The Council's overarching planning spatial vision is set out in the emerging Core Strategy, the principal document in the LDF. The Core Strategy is underpinned by five thematic strategic objectives:

- Regeneration and growth areas
- Providing new homes
- Growing the local economy
- Environmental management
- Building a sustainable community

The Core Strategy supports the London Thames Gateway growth area and the London Plan Opportunity Area designations, with physical growth and regeneration primarily focused on areas in the north of the borough. This approach responds to the local character of the borough and the need to capitalise on the higher public transport accessibility of the area; intensifying land uses, in town centres and redesignated employment/industrial land.

The Core Strategy sets out the Lewisham town centre as one of the key Regeneration and Growth Areas in the borough. As such, it is expected to accommodate substantial new jobs, homes and supporting facilities and infrastructure becoming a focus of change and significant regeneration.

The Council has undertaken various rounds of public consultation in preparing the Core Strategy and submitted the final version to the Government for its approval in October 2010. A decision is expected by early 2011. The Core Strategy Vision and Strategic Objectives are provided as Appendix 1.

The challenge is how the vision for Lewisham town centre as set out in the Core Strategy is implemented through a spatial and land use framework in the form of an AAP.

#### **Lewisham Town Centre AAP Vision**

Lewisham Strategic Partnership, of which Lewisham Council is a part, has adopted the following vision for the Borough, as set out in the Sustainable Community Strategy (SCS) 2008-2020 called Shaping our Future:

“Together we will make Lewisham the best place in London to live, work and learn.”

The Core Strategy takes forward the SCS vision by setting out a detailed spatial vision for the whole Borough. In terms of Lewisham Town Centre, it sets out the following:

“Lewisham Town Centre will have been transformed into a shopping and leisure destination of exceptional quality, offering a strong focus for community identity and cohesion. The centre will benefit from the Lewisham Gateway site delivering easier and better pedestrian routes between the bus and train stations and the high street, a new road layout and new commercial, retail and residential development. New high quality residential developments will help to increase the number and diversity of people using the centre and support its Metropolitan Town Centre status. The street market will continue to provide an extensive range of goods and its overall contribution to the quality of the urban environment will be improved. The Quaggy and Ravensbourne Rivers

will be celebrated by the provision of a network of public green spaces and parks including Cornmill Gardens. A new landscaped public plaza where these two rivers meet will consolidate the identity of Lewisham as a river valley town and provide an enhanced sense of place and focus. Buildings, streets and spaces will be designed and managed to take account of climate change and incorporate on-site clean and renewable energy technologies, including a decentralised energy network ”

This vision has been developed into a series of objectives for the Lewisham Area Action Plan which are set out below. These objectives will guide the production of policy through providing a tool to assess policy and proposals against.

### **Area Action Plan Objectives**

The following objectives have been derived utilising the results of the review of policy, programmes and objectives. The objectives have been organised by theme, to ensure that the AAP covers the full scope of issues and topics defined by statutory documents in the planning framework and contextual strategic documents. The amended objectives will then feed into the Issues/Options phase and the parallel Sustainability Appraisal process

**Objective 1 - Retail and town centre status:** To support and improve the vitality and viability of Lewisham town centre by enhancing distinctive features such as the street market and achieving Metropolitan Centre status by 2026 through the delivery of 40,000 sqm of additional retail floor space and improved leisure floorspace

**Objective 2 - Housing:** To deliver up to 2,300 additional new homes by 2016 and a further 800 additional new homes by 2021 to create a sustainable and mixed community of private and affordable housing in line with the Core Strategy with highest densities focused in locations with the highest level of accessibility.

**Objective 3: Sustainable Design:** To apply consistently high standards of sustainable urban design and construction to individual sites to ensure that developments make the best use of natural resources, enable people to easily make environmentally aware choices and are carefully phased and co-ordinated to create a cohesive place and a sustainable community

**Objective 4 – Employment and training:** To maximise job opportunities by retaining/re-providing employment generating uses, the redevelopment of key sites throughout the centre for a range of non-residential uses, including offices and the enhancement of training opportunities.

**Objective 5 - Open space/recreation:** To encourage healthy lifestyles through the maintenance, protection and improvement of the supply of publicly accessible open space (including public realm and the town centre streetscape), and incorporation of additional recreational and open space as part of new developments.

**Objective 6 - Transport:** To encourage patterns of development which support walking, cycling and the use of public transport, reduces the need for private car travel, maintains and where possible improves the high levels of public transport accessibility of the town centre and knits the centre in with the surrounding area.

**Objective 7 - Environment:** To protect and enhance the Rivers Quaggy and Ravensbourne and ensure that the town centre can mitigate and adapt to the risks arising from climate change by focusing on protecting the area against extreme weather conditions, mitigating heat island effects and delivering energy efficient and low carbon development.

**Objective 8 - Community:** To create a place that enables and promotes the adoption of healthy lifestyles and delivers appropriate levels of educational, community and leisure facilities that keep pace with proposed growth.

**Objective 9 - Implementing and monitoring the AAP:** To ensure that partners in the public, private and third sectors continue to work together to ensure that the forecast growth in the town centre is carefully monitored, managed and delivered throughout the plan period

## 4. Relevant Plans, Programmes and Objectives

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 Lewisham Town Centre Area Action Plan.

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 table in **Appendix 3** summarises a number of regional and local plans and programmes that have been reviewed with a view to identifying policies, objectives and baseline information of relevance to the Lewisham Town Centre area.

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

<i>International</i>
<p>Agenda 21 Declaration Rio de Janeiro (1992)</p> <p>Convention on Biological Diversity, Rio de Janeiro (1992)</p> <p>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</p> <p>The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) 2002</p> <p>Status: Statutory</p>
<i>European Union</i>
<p>European spatial declaration on sustainable development, European Union (1999)</p> <p>Status: voluntary</p> <p>European Spatial Development Perspective (1999)</p> <p>EU Sustainable Development Strategy (2001)</p> <p>European Community Biodiversity Strategy (1998)</p> <p>Sixth Environment Action Programme of the European Community (2002 – 2012)</p> <p>Status: voluntary</p> <p>Air Quality Framework Directive (96/62/EC) and daughter Directives</p> <p>Status: Statutory</p> <p>Directive 2003/87/EC</p> <p>Landfill Directive 99/31/EC</p> <p>Framework Waste Directive (Directive 75/442/EEC, as amended)</p> <p>Status: Statutory</p> <p>Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora)</p> <p>Status: Statutory</p> <p>Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds)</p> <p>Status: Statutory</p> <p>Water Framework (2000/60/EC)</p>

Status: Statutory

EU Sixth Environmental Action Plan (2002)

*National*

Environmental Assessment of Plans & Programmes Regulations (2004)

Status - Statutory

Planning and Compulsory Purchase Act (2004)

Status - Statutory

Town And Country Planning Act (1990)

Status - Statutory

Planning and Energy Act (2008)

Status - Statutory

Energy Act (2008)

Status - Statutory

Use Classes Amendment Order (2005)

Status - Statutory

UK Climate Change Act (2008)

Planning Policy Statement (PPS) 1: Delivering sustainable development

PPS: Planning and climate change – supplement to PPS1

PPG2 Green belts

PPS3 Housing

PPS4 Planning for Sustainable Economic Growth

PPS5 Planning for the historic environment

PPS9 Biodiversity and geological conservation

Draft PPS: Planning for a Natural and Healthy Environment

PPS10 Planning for sustainable waste management

PPS12 Local spatial planning

PPG13 Transport

PPG14 Development on unstable land

PPG17 Planning for open space sport and recreation

PPG19 Outdoor advertisement control

PPS22 Renewable energy

PPS23 Planning and pollution control

PPS25 Development and flood risk

By Design: Urban Design in the planning system (2000)

Planning and access for disabled people: A good practice guide

Education and skills – delivering results a strategy to 2006 (revised 2002)

Sustainable development action plan for education and skills (2003)

Delivering choosing health: making healthier choice easier (2004)

CLG employment land reviews: guidance note (December 2004)  
 Homes for the future, more affordable, more sustainable (2007)  
 Transport 2010: Meeting the local transport challenge (2000)  
 UK Air Quality Strategy 'Working together for clean air'  
 Our energy future, creating a low carbon economy (2003)  
 Waste Strategy for England (2008)

### *London*

The Mayor's Air Quality Strategy (2002) and Clearing the air: The Mayor's draft air quality strategy (2010)  
 Developing London's Economy, the Mayor's Economic Development Strategy (2010)  
 Connecting with nature, the Mayor's Biodiversity Action Plan (2002)  
 London Biodiversity Partnership Action Plan (1996)  
 The Mayor's Cultural Strategy (2004)  
 London Climate Change Adaptation Strategy (2008)  
 Streets For All: A Guide to the management of London's Streets – English Heritage (2000)  
 Guide to Preparing Open Space Strategies (2004)  
 Empty Homes in London (2004)  
 London Housing Strategy (2010)  
 The Mayor's Transport Strategy (2010)  
 The London Plan and the draft London Plan (2010)  
 Mayor of London's Municipal Waste Management Strategy (2003)  
 NHS and Urban Planning in London – Final Report (2003)  
 'Supplementary Guidance on the protection of strategic views In London  
 The London Road Safety Plan (2001)  
 GLA Supplementary Planning Guidance on Employment Land  
 The Mayor's Ambient Noise Strategy  
 Mayor of London 'Green Light to Clean Power' Energy Strategy (2004)  
 Revised London View Management Framework (2009)  
 London Tree and Woodland Framework

### *Lewisham*

Lewisham Unitary Development Plan  
 Lewisham Sustainable Community Strategy (SCS)  
 Community Safety Strategy (2008-2011) (CSS)  
 Safer Lewisham Plan (2009-10)  
 Lewisham Corporate Plan 2008-2011  
 Lewisham Volunteering Strategy  
 Ageing well in Lewisham – A well-being strategy for older people 2007-10

Lewisham Local Cultural Strategy (2002)  
 Lewisham Regeneration Strategy 2008-20  
 Lewisham Local Area Agreement (LAA) (2009)  
 Healthier Communities – A health and well-being framework for Lewisham  
 Lewisham Physical Activity, Sport and Leisure Strategy (2007-12)  
 Social Inclusion Strategy 2005-13  
 Local Biodiversity Action Plan – A Natural Renaissance For Lewisham  
 Lewisham Leisure and Open Space Study (2009)  
 Lewisham Housing Strategy 2009 -2014  
 Brighter futures: Lewisham’s Homelessness Prevention Strategy 2009-2014  
 (DRAFT- June 2009)  
 Lewisham Children and Young People’s Plan 2009-2012  
 Creative Lewisham – Lewisham Cultural and Urban Development Commission  
 Safer Places: The planning system and crime prevention  
 Draft Lewisham Municipal Waste Strategy 2004/05 – 2009/10  
 Lewisham Carbon Reduction and Climate Change Strategy (2008)  
 Lewisham Local Air Quality Action Plan (2008)  
 Lewisham Strategic Flood Risk Assessment (2008)  
 Lewisham Flood Risk and Development Sequential Test (2009)  
 Lewisham borough-wide transport assessment (2009)  
 Lewisham Employment Land Study (2008)  
 Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment  
 (JSNA)(2009)  
 Lewisham Retail Capacity Study (2009)  
 Lewisham Infrastructure Delivery Plan (2009)  
 Lewisham Strategic Housing Market Assessment (2008)  
 South East London Boroughs’ Strategic Housing Market Assessment (2009)  
 Lewisham Affordable Housing Viability Assessment (2009)  
 Town Centre Health Checks (2009)  
 Lewisham PPS1 Energy Study (2009)  
 Ravensbourne River Corridor Improvement Plan (2010)  
 South East London Boroughs’ Joint Waste Appointment Technical Paper (2009)  
 Lewisham Town Centre Transport Study (2009)  
 Lewisham draft Local Implementation Plan (2010)  
 Deptford New Cross Masterplan (2007)  
 Lewisham Tall Buildings Study (2010)  
 Lewisham Borough Wide Character Study (2010)  
 Lewisham Conservation Area Appraisals and Management Plans

Lewisham Children and Young People's Plan (2009)  
Lewisham Social Inclusion Strategy (2005)  
Local Education Authority School Plan  
Lewisham NHS Estate Strategy  
Healthy Weight, Healthy Lives (PCT with LB Lewisham) 2009

The social, economic and environmental issues that were identified from this review are summarised in Section 6 and included in detail in **Appendix 4**.

## 5. Issues From Consultations and Studies

Urban Practitioners consulted on the “Lewisham Town Centre Development Strategy” (August 2004). Consultation was undertaken with key stakeholders through processes such as steering group meetings; the Lewisham Town Centre Walking Audit Event; Lewisham Information Day (Questionnaire); and stakeholder meetings with Councillors, Council Officers, Landowners, the Lewisham Association of Street Traders, the voluntary sector and other key local representatives.

A consultation process was also undertaken for ‘Urban Renaissance Lewisham: Health and Social Impact Assessment’, March 2004. The stakeholders consulted were defined by the following categories: strategic, service providers, local residents, transient and whole population. A range of approaches was adopted to engage people in the evidence gathering. The methods included: publishing the study through articles in local newsletters, holding workshops for groups such as Primary Care Trust staff, making visits to groups such as tenants and residents associations, devising a school based programme which ran throughout one week, undertaking one-to-one interviews and making questionnaires available where people did not have time to have a discussion or workshop.

Since the preparation of the original scoping report for the AAP, 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.

As previously detailed, the SA Scoping Report originally completed in 2005 has been refreshed in 2010 during the process of performing this version of the SA. A number of responses were received that have influenced the development of this report.

The social, economic and environmental issues that were identified from the review of each of these consultations are summarised in Section 6 and included in detail in **Appendix 4**.

## 6. Summary of Key Sustainability Issues for the SA

The key sustainability issues facing the borough are listed in the following table along with source documents that constitute the evidence base for these.

Key issues	Source
<b>Economic</b>	
<p><b>Poor rates of growth in the retail offer in Lewisham Town Centre</b></p> <p>With predicted population growth there is a need for enhancing the vitality of Lewisham town centre, to improve the local economy and reduce the need to travel outside the borough for goods and services</p> <p><b>Low quality retail offer</b></p> <p>Issues with the street market, including mess and refuse, upgrading and improper parking</p> <p><b>Provision of adequate employment land to support business enterprise</b></p> <p>Sufficient employment land will need to be protected and new land sought to improve the overall economy of the town centre and the borough. Opportunities need to be taken to support employment growth sectors.</p> <p><b>Limited offer and a lack of growth of the evening economy</b></p>	<ul style="list-style-type: none"> <li>• Lewisham Employment Land Study 2008</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Economic Development Business Plan 2004 (Ancer Spa)</li> <li>• Lewisham Retail Capacity Study 2009</li> <li>• Lewisham Town Centre Health Check Report 2008/09</li> <li>• London-wide Town Centre Health Checks Analysis 2008</li> <li>• Managing the Night Time Economy 2007</li> <li>• Consultation Results</li> </ul>
<b>Environmental</b>	

Key issues	Source
<p><b>Protect and improve biodiversity and natural habitats including local waterways</b></p> <p>Brownfield sites are important habitat for local species. Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered marked declines.</p> <p>The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</p> <p><b>Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas. There is a need to reduce flooding and manage risk.</b></p> <p>The Rivers Quaggy and Ravensbourne run through the AAP area and increase the risk of flooding in the area</p> <p>Future increased development could lead to increased potential risk of surface water flooding and sewer surcharging.</p> <p><b>Water quality and use</b></p> <p>In order to proceed with housing growth then water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance.</p> <p>Water quality of river and groundwater is needed as the town centre is situated within an Inner Source Protection Zone (SPZ1)</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Leisure and Open Space Study 2009</li> <li>• Lewisham (A natural renaissance for Lewisham) Biodiversity Action Plan 2006</li> <li>• Thames Strategy East 2008</li> <li>• Green Chain Policy Document 1977</li> <li>• Ravensbourne River Corridor Improvement Plan 2010</li> <li>• London River Restoration Action Plan (LRRAP) (2009)</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Strategic Flood Risk Assessment 2008</li> <li>• Sequential Test 2009</li> <li>• Lewisham Characterisation Study 2010</li> </ul>
<p><b>CO<sub>2</sub> emissions contributing to climate change</b></p> <p>Climatic change due to greenhouse gas emissions from fossil fuel use are likely to affect the natural environment. The built environment will need to adapt to these changes and find ways of reducing carbon emissions, including developing viable decentralised renewable energy networks to supply energy to new and existing developments.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Carbon Reduction and Climate Change Strategy 2008</li> <li>• Lewisham Energy Strategy</li> <li>• Air Quality Action Plan 2008</li> <li>• Lewisham Renewable Energy Study 2009</li> <li>• Strategic Flood Risk Assessment 2008 Sequential Test 2009</li> <li>• Local Implementation (Transport) Plan 2006</li> </ul>

Key issues	Source
<p><b>Traffic congestion and car dependence</b></p> <p>A growing population will increase movement, placing pressure on the road network and existing public transport. There is a need to locate development near existing transport links and improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking.</p> <p><b>High levels of air pollution due to traffic</b></p> <p>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.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-2020</li> <li>• Local Implementation (Transport) Plan 2006</li> <li>• North Lewisham Links Strategy 2007</li> <li>• Ravensbourne River Corridor Improvement Plan 2010</li> <li>• Borough-wide Transport Study 2010</li> <li>• Lewisham Town Centre Transport Study 2009</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Air Quality Action Plan 2008</li> <li>• Health Issues in Planning, Best Practice Guidance 2007</li> <li>• Transport 2025, Transport vision for a growing world city, November 2006</li> </ul>
<p><b>Aging building stock and poor levels of insulation</b></p> <p>The existing building stock will require updating with improvements in energy efficiency and increases in building Standard Assessment Procedure ratings</p> <p><b>The need to increase the amount of renewable energy generated in the borough</b></p> <p>Lewisham's Energy policy requires an increase in the proportion of energy generated from renewable energy sources</p> <p><b>Low levels of recycling and the need to reduce total waste production</b></p> <p>There is a need to reduce waste generation and improve recycling and composting rates. With requirements to manage our waste within the borough boundaries this issue will become increasingly important.</p>	<ul style="list-style-type: none"> <li>• Lewisham Energy Strategy</li> <li>• Lewisham Renewable Energy Study 2009</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• South East London Boroughs' Joint Waste Apportionment Technical Paper</li> <li>• Lewisham Waste Management Strategy</li> </ul>
<b>Social</b>	
<p><b>High demand for housing, affordability and continuous growth in population.</b></p> <p>The population is forecasted to rise. The Mayor of London requires 9,750 new residential units to be built in Lewisham by 2017. The average income of the majority of households</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Strategic Housing Market Assessment 2008</li> </ul>

Key issues	Source
<p>is insufficient to buy a house.</p> <p>There is an issue with access to affordable housing in Lewisham, highlighted by Lewisham Housing Commission.</p> <p><b>Decent homes</b></p> <p>The percentage of homes that do not meet decent homes standards is reducing, however there is still a need to improve this.</p>	<ul style="list-style-type: none"> <li>• South East London Sub Regional Strategic Housing Market Assessment 2009</li> <li>• Housing Strategy 2009</li> <li>• Children and Young Peoples Plan</li> </ul>
<p><b>Improved access to health care, education and community facilities</b></p> <p>Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs.</p> <p><b>Low levels of educational attainment</b></p> <p>There is a need to improve the educational attainment of students in primary and secondary schools as previous years Lewisham has come 132<sup>nd</sup> out of 147 authorities in the BVPI results in terms of percentage of pupils achieving A-C in five or more GCSEs.</p> <p><b>Addressing deprivation, social exclusion and health inequalities</b></p> <p>Lewisham has a number of severely deprived areas. Fourteen of Lewisham wards have part of their area in the 20% most deprived wards in England. In Lewisham Central residents have also reported higher levels of limiting long term illness and lower than average food health levels.</p> <p>There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Social Inclusion Strategy 2005</li> <li>• Lewisham NHS Estate Strategy</li> <li>• Local Education Authority Plans</li> <li>• Lewisham Infrastructure Delivery Plan</li> <li>• Lewisham Physical Activity, Sport and Leisure Strategy 2006</li> <li>• Lewisham School Sports Facility Strategy 2006</li> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Children and Young Peoples Plan</li> <li>• Local Education Authority School Plan</li> <li>• Lewisham School Sports Facility Strategy 2006</li> <li>• Indices of Multiple Deprivation 2007</li> <li>• Joint Strategic Needs Assessment</li> </ul>
<p><b>General perception of high crime rates in Lewisham</b></p> <p>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 with adequate natural surveillance. Lewisham town centre is vulnerable to crime due to the high volume of people using it, therefore creating a safe environment and improving the perception of crime in the area is essential in achieving the objective to improve the retail performance of the centre.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Social Inclusion Strategy 2005</li> <li>• Lewisham Local Cultural Strategy 2002</li> <li>• Metropolitan Police statistics</li> </ul>
<p><b>Provision of open space and recreational facilities</b></p> <p>Future growth in the housing sector will result in a lower proportion of open space per 1000 population. Opportunities to provide additional open spaces from potential developments must be used to improve health and well-being. Previous community consultation suggests that</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Lewisham Leisure and Open Space Study 2009</li> <li>• Lewisham Physical Activity, Sport and</li> </ul>

Key issues	Source
<p>access to open and green space is a key issue for local residents.</p>	<p>Leisure Strategy 2006</p> <ul style="list-style-type: none"> <li>• Green Chain Policy Document 1977</li> </ul>
<p><b>Noise</b></p> <p>Road traffic and road works noise are the most problematic types of noise for Lewisham residents, and there are also issues with industrial noise in parts of the borough.</p> <p><b>Road safety</b></p> <p>The results of stakeholder consultations have identified problems with pedestrian safety, particularly in the High Street, where there are problems with conflict between traffic, buses and pedestrians.</p> <p>The number of road accidents although reducing could still be improved.</p>	<ul style="list-style-type: none"> <li>• Quality of Life Survey 2004</li> <li>• Best Value performance indicators</li> </ul>
<p><b>Conserve and enhance local heritage assets(cultural, archaeological and historic) and their settings and maximise the contribution that the historic environment can make to an area</b></p> <p>Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and conservation areas. The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals. In the town centre, there are a number of Grade II listed churches, buildings and monuments of intrinsic historic and townscape value.</p>	<ul style="list-style-type: none"> <li>• Shaping our Future Lewisham's Sustainable Community Strategy 2008-20</li> <li>• Deptford New Cross Masterplan 2007</li> <li>• Lewisham Local Cultural Strategy 2002</li> <li>• Lewisham Conservation Area Appraisals and Management Plans</li> <li>• Lewisham Local List</li> <li>• Listed Buildings</li> <li>• Lewisham UDP Schedules 1A, 3 and 5</li> <li>• Lewisham Leisure and Open Space Study 2009</li> <li>• Lewisham Tall Buildings Study 2010</li> <li>• Lewisham Characterisation Study 2010</li> </ul>

## 7. Sustainability Appraisal Objectives

### 7.1. Introduction

The Sustainability Objectives were developed and consulted on as part of the Sustainability Appraisal Scoping process. The objectives have been reviewed in light of comments received as part of the Scoping Report consultation and the revised objectives are listed below for reference. Changes made to the sustainability objectives as a result of consultation on the 2010 refreshed scoping report are highlighted in blue.

### 7.2. Sustainability Objectives

The sustainability objectives that have been used as the basis for sustainability appraisal of the Lewisham Town Centre Area Action Plan are presented in Table 1 below. These sustainability objectives are distinct from the plan objectives of the Area Action Plan. The assessment for each appraisal are limited to those which are relevant.

The full list of SA objectives including monitoring information, targets and indicator sources are available in Appendix 5.

Ref	Topic	Sustainability Appraisal Objectives
<b>Social</b>		
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport
Soc2	Decent homes	To increase the provision of housing that meets decent homes standards
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities
Soc5	Historic environment	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places
Soc6	Culture	To protect and enhance cultural diversity and promote community cohesion and civic pride
Soc7	Crime	To reduce crime levels in the town centre and reduce fear of crime
Soc8	Education	To increase access to lifelong learning
Soc9	Social inclusion and deprivation	To improve access to amenities for vulnerable members of the community and reduce poverty and deprivation
Soc10	Road safety	To improve pedestrian safety in the town centre
Soc11	Health	To improve inclusive access to local healthcare facilities and encourage healthy lifestyles through sustainable urban design
Soc12	Noise	To reduce noise from road traffic, construction and industry
Soc13	Open space	To increase the quality and provision of publicly accessible open spaces

Ref	Topic	Sustainability Appraisal Objectives
<b>Environmental</b>		
Env1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change by using mitigation and adaptation measures through sustainable design and construction
Env 2	Flood risk	To reduce and manage the risk and effects of flooding
Env3	Sustainable transport	To reduce dependency on private cars through enhancing pedestrian, cycle and public transport routes throughout the town centre
Env4	Renewable energy	To increase on-site renewable energy provision
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings
Env6	Waste and recycling	To reduce the consumption of materials and resources and the production of waste and increase the amount of waste recycling
Env7	Water quality and use	To provide sustainable sources of water and promote water efficiency
Env8	Air quality	To improve air quality
Env9	Nature conservation	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies
Env10	Maintain and enhance landscapes and townscapes	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape
<b>Sustainable economic growth</b>		
Eco1	Retail offer	To increase the diversity of the retail offer
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy
Eco 3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment
Eco3	Local business	To increase density of local business
Eco4	Employment opportunities	To increase access to local employment and reduce local unemployment

## 8. AAP options and alternatives

The Lewisham Town Centre AAP sets out the vision, objectives, strategy and policies that will guide public and private sector investment to manage development and regeneration in the centre over the next 5 to 10 years.

In developing the AAP a series of options and alternatives were produced. An initial Issues and Options Report was produced in June 2005. At this time feedback was provided on the sustainability implications of each set of options. Wherever possible, the preferred option was identified. The results of this analysis are provided at Annex C of the Sustainability Appraisal Report of the Preferred Options for the Lewisham Town Centre AAP, April 2007. The Further Options Report itself also details the options generation process undertaken to date and is located in Appendix 3 of that report. Please refer to that section for further detail.

## 9. Appraising the AAP and the likely significant effects

### 9.1 Methodology

This section sets out a summary of the main issues resulting from the appraisal of the Lewisham Town Centre AAP against the sustainability objectives. 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 AAP. 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 AAP
- 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.

The evaluation of likely effects involves forming a judgement based on:

- The criteria of significance in Annex II of the SEA Directive; and
- The baseline characteristics and indicators outlined above and in Appendix xxx on whether or not a predicted effect will be environmentally significant.

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

++	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
?	Unknown impact

The internal consistency of the sustainability appraisal objectives has not been appraised in this report, as the objectives are based on those in the Core Strategy where this is appraised in section 7.1 of that SA report.

## 9.2 Appraising the AAP objectives

This section summarises the appraisal carried out to test the AAP objectives against each SA objective. This exercise was undertaken at the Scoping stage of the SA and the results of the comparison showed that there were some areas of possible conflict. The following amendments were made to resolve these potential conflicts:

- Possible conflict with new affordable housing in terms of increasing car use. The current SA objectives were amended to include 'with good connectivity to public transport'
- Possible conflict with new retail, residential and business development with increasing open space and protecting biodiversity. Consideration of biodiversity, open space and reducing impact on environment were added to the AAP objectives
- There is possible conflict between provision of additional housing and access to healthcare, employment and other local facilities for existing and new population. AAP objectives were amended to provide for this additional demand.
- Possible conflict with new development and heritage value of existing town centre. This consideration is now included in AAP objectives.

## Comparison of DPD objectives against sustainability objectives

	Objective 1 – Retail and town centre status	Objective 2 – Housing	Objective 3 – Sustainable Design	Objective 4 – Employment	Objective 5 – Open space/ recreation	Objective 6 – Transport	Objective 7 – Environment	Objective 8 – Leisure and community	Objective 9 – Implementing and monitoring the AAP
<b>Soc1</b>	Positive compatible	Positive compatible	Positive compatible	Possible conflict	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Positive compatible
<b>Soc2</b>	Positive compatible	Positive compatible	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc3</b>	Neutral	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc4</b>	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc5</b>	Possible conflict	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Soc6</b>	Possible conflict	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc7</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc8</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc9</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc10</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc11</b>	Neutral	Possible conflict	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc12</b>	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Soc13</b>	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Env1</b>	Neutral	Possible conflict	Positive compatible	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env2</b>	Neutral	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env3</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Env4</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env5</b>	Neutral	Neutral	Neutral	Neutral	Neutral	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Env6</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env7</b>	Positive compatible	Positive compatible	Neutral	Positive compatible	Neutral	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env8</b>	Positive compatible	Possible conflict	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible
<b>Env9</b>	Possible conflict	Possible conflict	Neutral	Neutral	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
<b>Env10</b>	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible	Neutral	Positive compatible
<b>Eco1</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Eco2</b>	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible	Positive compatible
<b>Eco3</b>	Positive compatible	Possible conflict	Positive compatible	Positive compatible	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible

	Objective 1 – Retail and town centre status	Objective 2 - Housing	Objective 3 – Sustainable Design	Objective 4 – Employment	Objective 5 – Open space/ recreation	Objective 6 – Transport	Objective 7 – Environment	Objective 8 – Leisure and community	Objective 9 – Implementing and monitoring the AAP
<b>Eco4</b>	Positive compatible	Possible conflict	Neutral	Positive compatible	Possible conflict	Neutral	Positive compatible	Positive compatible	Positive compatible
<b>Eco5</b>	Positive compatible	Possible conflict	Neutral	Positive compatible	Neutral	Positive compatible	Positive compatible	Positive compatible	Positive compatible

### 9.3 Appraising the AAP area wide spatial policies and character areas

This section summarises the outcome of the appraisal on the AAP area wide spatial policies and the appraisal of the character area policies. These policies have been summarised together to avoid repetition as many of the benefits and issues are reflected both in the area wide policies and in the character area policies.

#### Key benefits

Key benefits identified have been summarised below:

##### *Housing and mixed use*

The provision of new homes above empty offices or vacant premises was identified as a significant positive impact, as it will contribute towards achieving SA objectives SOC1 and SOC2 and also ENV10 through promoting the reuse of vacant buildings. The objective would also contribute towards SOC7, as through encouraging people to live above commercial units in the centre of town this would provide natural surveillance in the area throughout the day and evening. Policy URB4 promotes mixed use development in the town centre and particularly high density residential development above ground floor level. This policy therefore also contributes very positively to SA objectives SOC1 and SOC2 and positively towards achieving SOC7 and ENV10.

##### *Shopping*

Significant positive economic impacts were identified in terms of policy SH2 as the policy promotes new retail and a sustainable mix of town centre uses and improvements to the shopping environment, which will help to improve the attractiveness of the town centre to both users and potential investors. Policy SH5 and SH3 also scored positively as they seek to protect existing A1 retail units and Lewisham Market. Retaining retail floorspace and increasing it where possible is essential to achieve Lewisham's wider objective of achieving Metropolitan retail status. Policy SH7 identifies different retail character areas in the AAP area and requires developments within each area to take account of its retail character. This contributes significantly towards achieving SA objective ECO1, in increasing the diversity of retail offer.

##### *Design, public realm and movement*

Policy URB6 sets out criteria for the design of the public realm in Lewisham Town Centre, including requirements for public art and improvements to pedestrian connections. This policy therefore scored particularly well against SA objectives ENV3 (sustainable transport) and ENV10 (maintain and enhance landscapes and townscapes). The policy also seeks to enhance community safety through ensuring the design of new development provides overlooking of entrances and exits and defines and addresses public spaces.

##### *Environment*

New policy 1 sets out requirements to reduce carbon dioxide emissions in Lewisham Town Centre. This policy therefore contributes very positively towards the achievement of ENV1 and ENV4 as it promotes the use of renewable energies and will help to ensure the town centre is resilient to climate change in the future. A potential conflict was flagged up in the appraisal process in terms of the impact on air quality as initial options included the potential for the promotion of biomass for energy generation on-site. However this was identified as having a potentially negative impact on the AQMA as the burning of biomass and the transportation of wood chip to the boiler could potentially have a negative impact upon the air quality of the area. Therefore as a result of the identification of this issue the use of biomass is not promoted in the final policy.

## **Key conflicts**

The key conflicts that have been identified as part of the appraisal process are set out below:

### *Open space*

The loss of Metropolitan Open Land (MOL) in association with the development of Lewisham Gateway and Loampit Vale was identified as a significant negative impact in terms of SA objective SOC13, to increase the quality and provision of publicly accessible open space. However, the quality of the existing MOL is poor, as it consists of narrow strips of space alongside roads, railways and rivers and is not a large expanse of open space, therefore it is currently not truly performing the function of MOL. The approach taken to MOL is discussed in detail and appraised fully in the Core Strategy SA.

### *Flood Risk*

The majority of Lewisham Town Centre has been identified as a high or medium risk of flooding, therefore many of the site specific policies conflict with the SA objective ENV2. The Central, Loampit Vale and Lee High Road character areas are affected by flood zone 3a and residential uses are promoted within these areas. As residential uses are classified as “more vulnerable” uses in PPS25 a sequential and exception test are required to demonstrate that the proposals are acceptable. The sequential test for Lewisham has already been undertaken, therefore an exception test will be required in order to satisfy PPS25 in terms of the acceptability of residential on sites in flood zone 3a.

### *Transport*

Policy TRS2 seeks to retain the quantum of existing public/shopper car parking spaces in the town centre as a minimum level, and requires additional spaces in combination with any new retail development. This conflicts with a number of the sustainability objectives, in particular ENV3 as by retaining/increasing parking spaces in the town centre, the policy is facilitating the use of the private motor vehicle for shopping trips to the town centre. However, the level of parking provided in a town centre such as Lewisham will be important to secure its competitiveness and differentiate its offer from other nearby shopping centres, and therefore support Lewisham’s bid to become a Metropolitan retail centre.

### *Employment*

EMP1 protects the Molesworth Street area as an employment site and states that in general employment uses will be sought to be retained. However the policy sets out the circumstances in which conversion of employment sites will be allowed, therefore the appraisal notes that there is potential for conflict with the economic growth SA objectives here if the policy is not carefully implemented.

## Mitigation measures

The loss of MOL at Loampit Vale and Lewisham Gateway is mitigated through the provision of new high quality open space within the new developments.

The level of parking promoted in policy TRS2 is necessary to ensure that the town centre is able to compete in the future with nearby retail centres. Other policies in the AAP seek to greatly improve pedestrian links across the town centre, which will help to encourage shorter journeys to the town centre to be made by foot. The area also benefits from very good PTAL scores and the development of Lewisham Gateway close to public transport links will help to encourage the use of sustainable modes of transport.

In terms of flooding, policies which propose development on land at risk of flooding indicate that developers should work closely with the Environment Agency to ensure proposals are acceptable in terms of flood risk and do not increase the risk of flooding. The sequential test for Lewisham indicates that there are no sequentially preferable sites available for the major sites in this AAP affected by flood risk as these particular sites have a crucial role in the future regeneration of the centre of Lewisham. To adapt and mitigate the risk of flooding AAP policies require that buildings are designed to be resilient to flood risk and that Sustainable Urban Drainage Systems (SUDS) and other mitigation measures are included. Further discussions with the Environment Agency and the production of Exception Tests are required to develop more vulnerable uses such as housing within areas identified as falling within Flood Zone 3a in Lewisham's SFRA.

## 9.5 Cumulative and long term effects

Cumulative impacts refers to the total or combined impacts or effects arising from the implementation of the policies. The impact can be positive or negative. The cumulative and long term effects of the policies have been considered on a policy by policy basis in the detailed assessment tables contained in appendix 1.

A summary of the appraisal findings in terms of cumulative impact is below:

### *Economic*

There are likely to be positive cumulative effects on economic growth and employment with the retention and protection of strategic industrial locations and also the promotion of new retail within the town centre. The AAP also promotes a mixed use approach to sites, including new homes and evening economy uses, thus improving the diversity of the town centre offer and ensuring there is activity and vibrancy throughout the day and evening. The combined impact of this will help to improve the attractiveness of the town centre to users and potential investors and contribute towards achieving Metropolitan status, therefore there is likely to be a positive overall cumulative impact.

### *Environmental*

The implementation of New Policy 1 and URB4 in particular will help to improve the environmental quality of the town centre, and will have a positive cumulative impact upon the environment through helping to promote sustainable town centre living and low carbon development. The cumulative impact of developing within flood zones is potentially a negative impact, however the policies require that development is in accordance with PPS25 guidance and that the design should be developed in discussion with the Environment

Agency and incorporate appropriate flood mitigation designs to reduce flood risk. Care will need to be taken to ensure that development here does not impact upon wider flood risk and the water environment.

### *Social*

The proposals are likely to impact positively on the social fabric of the borough through the provision of new high quality housing in a central and easily accessible location. New community facilities, improved public realm and social infrastructure will ensure that the area is able to cope with the new housing development, and improve the existing condition of the area for the existing residents.

## **9.6 Mitigation measures**

SA guidance requires the adoption of mitigating measures that will prevent, reduce or minimise as far as possible any significant adverse effects of implementing the AAP. The predicted effects of the AAP have been evaluated and this has highlighted the need to balance the economic objectives of increasing the diversity of retail offer and the provision of more affordable homes with the potential impact upon the environment in terms of the use of resources, flood risk, traffic and carbon emissions. Mitigation measures for each predicted effect are discussed in the commentary section of the appraisal (see Appendix 1).

## **9.7 Uncertainties and risks**

### *Uncertainties*

The AAP has been assessed with the assumption that the economy, the natural environment and society does not diverge significantly from the current state of affairs. However, there can be unforeseen events that may alter the effect of the plan, such as the impacts of recession or environmental disasters. These are events that are beyond the control of plan making bodies.

The potential impact of the plan on climate change is also very difficult to measure, as many of the impacts are dependent upon how the policy is implemented on the ground.

### *Risks*

The SA was carried out by consultants in conjunction with Council planning officers. There is potential for subjective decision making leading to different appraisal scores by different individuals, however the scoring has been reviewed by a number of parties to ensure it is considered consistent.

## 9.8 Conclusions

The SA process identified that the AAP was likely to result in a number of social, economic and environmental benefits. The main benefits were in association with the proposals to provide new housing and retail within the town centre. This will contribute positively towards the sustainable economic growth SA objectives and also contribute towards securing additional affordable housing in a location which has excellent public transport links (Lewisham Town Centre has a PTAL score of 6 on average). The AAP policies seek to diversify retail uses and to improve the public realm significantly which will help to make the town centre environmentally and economically resilient in the future.

The town centre is affected by flood risk, with large parts classified as high or medium risk of flooding. Development of new housing within high risk flood areas is proposed as part of the AAP and this conflicts with the SA objective to reduce the risk and effects of flooding (ENV2). However the proposals would have significant regeneration benefits and would help to fulfil Lewisham's wider economic and social objectives, in particular, the achievement of Metropolitan retail status. Lewisham's Sequential Test has indicated that there are no alternate locations for the scale and type of development proposed, therefore exception tests will need to be undertaken to ensure that the final proposals are acceptable in terms of flood risk. The policies also require that flood mitigation measures are included in the design of development and that the Council liaise closely with developers.

Another potential conflict identified was in terms of parking provision. Policies seek to retain the amount of parking for shoppers in the town centre and increase provision in relation to any new retail development. This conflicts with the sustainability objective to encourage sustainable modes of transport. However, easy access to parking is a key advantage to Lewisham town centre which can differentiate its offer with other nearby competing retail centres, therefore it is considered essential to retain as much parking as possible.

Two of the key developments proposed in the AAP involve the loss of Metropolitan Open Land (MOL). However the quality and function of this MOL is limited, and the loss of the land is mitigated through the reprovision of open space. The loss of MOL at these sites has been considered and appraised in detail as a separate process to this work.

## 10. Proposals for monitoring

The evidence of how the SA objectives are being affected can only be detected by looking at evidence of how economic, environmental or social circumstances are changing in the borough over time. It is proposed that the effects of the objectives will be assessed using the monitoring framework provided in Appendix 5.

Appendix 5 details the sustainability appraisal objectives, appropriate indicators, current results, trends/comparator, frequency and period of monitoring and any targets that have been set. These are closely linked to the indicators of the Annual Monitoring Report, the Local Area Agreement, the monitoring framework of the AAP and other local or regional plans such as the Biodiversity Action Plan and the Local Implementation Plan (transport) to ensure consistency and accuracy of data. SA guidance states that SA monitoring should take an objectives and targets approach. It may be used to assess:

- accuracy of predictions of sustainability affects
- whether the AAP is achieving or moving away from SA objectives and targets
- whether mitigation measures are performing as well as expected
- whether there are any adverse effects and if remedial action is desirable.

Future monitoring should particularly have regard to objectives which have shown to be most effected by the AAP and are considered to be the following:

- waste management
- water consumption
- traffic flow
- air quality
- open space
- energy consumption
- housing provision
- employment levels
- crime
- developments in flood risk areas.

These issues should be investigated and provided with a continuous and robust set of data. This will ensure that resources are directed towards areas that are of most concern and in need of improvement.

## 11. Next steps

Following a period of consultation on the Further Options Report of the AAP and this Sustainability Appraisal, the Submission Version of the AAP will be prepared along with a final Sustainability Appraisal. The SA adoption statement will be published to demonstrate how environmental and sustainability considerations have been integrated in to the plan making process.

### How to comment on this report

You can tell us what you think about any part of this Sustainability Appraisal report. Comments must be in writing and can be made in any of the following ways:

#### Web

Ideally we would like you to provide your comments on-line against the relevant sections of this document at the following address

<http://consult.lewisham.gov.uk/portal>

OR

#### E-mail

[planning@lewisham.gov.uk](mailto:planning@lewisham.gov.uk)  
with 'LDF AAP Further Options Report' as the subject.

OR

#### Post

Planning Policy  
London Borough of Lewisham  
5th Floor, Laurence House  
1 Catford Road  
Catford, SE6 4SW

If you would like to speak to the Planning Policy Team about this report, please telephone us on 020 8314 7400.

Please send comments by: 5pm on (To be confirmed).

It may not be possible to take account of comments that are received after this date.



## APPENDIX 1: Appraisal of Lewisham Town Centre AAP

Matrix 1: Area wide spatial policies

AAP Policies	Sustainability Objectives															Cumulative impact	Timing & permanency	Comments													
	SOC													ENV					ECO												
	1	2	3	4	5	6	7	8	9	10	11	12	13	1	2				3	4	5	6	7	8	9	10	1	2	3	4	5
A policies																															
LTC HSG3	+	+	0	0	0	0	+	0	0	0	0	0	0	+	0	+	0	0	+	0	0	0	+	0	-	-	-	0	Unless carefully managed there is potential for the erosion of town centre /Lewisham wide office/employment space.	Long term Permanent	The provision of new homes through conversion of empty offices or vacant premises above shops will provide much needed new housing in the centre of Lewisham. New housing provides natural surveillance therefore helps to reduce opportunity for crime. There is potential conflict as the use of vacant offices/areas above shops reduces the overall employment floorspace available to let, however the policy requires LTC EMP2 to be met which requires other regeneration objectives to be met. There is potential for further reference to be made that conversion should be carried out in a flexible manner so as to allow for future changes in the economic climate, the policy has been adapted to reflect this. The re-use of existing buildings minimises resource consumption, therefore this policy scores positively against this.
LTC SH2	+	+	0	+	0	+	+	0	0	+	0	0	-	-	0	+	0	0		0	0	+	+	+	+	+	+	+	The use, and transport of materials and the resource requirements to develop new homes and retail units could cumulatively impact upon the local environment depending on how major development	Long term Permanent	The development of Lewisham Gateway and Loampit Vale will result in the loss of MOL. However it is proposed to provide new public space as part of the developments and this will mitigate this loss to some degree, and this has been fully considered and appraised as part of the Core Strategy. Development here is critical to ensure that Lewisham is capable of achieving Metropolitan status. The policy supports the sustainable economic growth objectives, by encouraging new retail, a mix of uses including evening economy uses and improvements to the shopping environment. This policy will need to be carefully implemented to ensure that the best use of resources is made and to encourage recycling of building materials and sustainable sourcing of materials as far as possible.

AAP Policies	Sustainability Objectives																									Cumulative impact	Timing & permanency	Comments				
	SOC													ENV										ECO								
	1	2	3	4	5	6	7	8	9	10	11	12	13	1	2	3	4	5	6	7	8	9	10	1	2				3	4	5	
																													is undertaken.			
LTC SH3	0	0	0	0	0	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+	Unlikely	Short- long term Temporary	The market will contribute significantly to the vibrancy of the local economy, and complement the retail offer of the town centre. Therefore there is estimated to be a significant positive impact in terms of the sustainable economic growth SA objectives.	
LTC SH5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	-	+			Unlikely	Short-long term Permanent	The retention of A1 retail units in the primary shopping area will help to retain the diversity of retail offer, however could reduce the chance of encouraging a more sustainable mix of uses in the town centre. However other uses will be more appropriate outside the primary shopping area of the town centre, therefore it is not anticipated that this will be inappropriate.
LTC SH6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	+	+			Unlikely	Short – long term Permanent	The change of use of a number of A1 units in secondary shopping areas to other uses could have a cumulative impact on the performance of the town centre, however the policy seeks to mitigate this through imposing particular criteria for development. The policy contributes particularly positively towards the objective of encouraging an evening economy as it provides flexibility to do this.
LTC SH7	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	+	+	0	0	Unlikely	Short- long term Permanent	The retail character areas ensure the town centre contains a mix of retailing appropriate to the areas, and the surrounding hinterland. Therefore this policy also contributes positively towards achieving the sustainable economic growth objectives.
LTC SH8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0		+	+			Unlikely	Short-long term Permanent	The policy encourages proposals that would contribute positively to the evening economy where particular criteria are met. These include ensuring the retail character of the area is not harmed and the cumulative impact of the proposal would not harm the amenity of nearby residents. This policy therefore contributes very positively towards SA objective ECO2 in particular. The impact upon retail offer and local businesses will depend upon implementation.













AAP Policies	Sustainability Objectives															Cumulative impact	Timing & permanency	Comments																																				
	SOC													ENV					ECO																																			
	1	2	3	4	5	6	7	8	9	10	11	12	13	1	2				3	4	5	6	7	8	9	10	1	2	3	4	5																							
																																																improvements therefore scores positively in terms of sustainable transport.						
Central	+	+	+	+	0	0	0	0	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	+	+	0	+	+	0																			New development within flood zone 3a could have a cumulative impact in terms of flood risk in the local and surrounding area. The implementation of this policy will need to be carefully managed.	Short-long term Permanent	Much of the area is located within flood zone 3a, and is proposed for residential use, therefore a sequential has been undertaken which indicates an exception test will be required as residential uses are proposed. The policies state that developers would be required to work closely with the Environment Agency to ensure appropriate flood mitigation is incorporated. These policies are therefore assessed as having a very negative impact in terms of SA objective ENV2. However, the policies do contribute very positively towards achieving SOC1 and 2 and it would result in new housing. The policies would also contribute towards achieving sustainable economic growth through promoting new retail in the town centre and a new anchor to encourage people to use the full length of the High Street. The policies also promote the enhancement of the market. The policies also encourage the improvement of the public realm and new landscaping therefore contributing positively to ENV10 and also ENV3 as it promotes improved links across the area and better pedestrian facilities. SOC3 as it promotes improved access to the river and Waterlink Way. Leisure uses are also potentially promoted within the area, therefore this contributes positively towards SOC11.

## APPENDIX 2: Lewisham Core Strategy Vision and Strategic Objectives

## **CORE STRATEGY VISION FOR LEWISHAM 2026**

In 2026 the regeneration and physical transformation of the London Borough of Lewisham will meet the needs and aspirations of existing and new residents and visitors by creating a sustainable, vibrant, exciting suburb on the edge of inner London one which supports safe, attractive and diverse communities where local people are at the heart of the regeneration process. It will be a place of choice for people to live, work and relax, having played a key part of the success in the Thames Gateway and of London as a world city.

Local, including historic, character will be at the heart of new design. New development throughout the borough will meet the challenges of climate change, flood risk, the need for renewable and low carbon energy, and the use of sustainable materials and construction practices. Accessibility and inclusiveness, and design to reduce crime and the fear of crime will be at the heart of the design of new developments. The provision of new green space will be emphasised both in terms of local recreation and children's play space, and new initiatives for urban food growing and the provision of allotments. Biodiversity in new developments will have been enhanced wherever possible through the provision of on-site open and amenity space, including the use of living roofs and walls. The borough will be greener by a programme of street tree planting.

Key regeneration and development opportunities will have been focused on the localities of Lewisham, Catford, Deptford and New Cross due to the desire to address deprivation issues in order to improve education standards, general health and well-being, and local employment and training, through improvements to the physical and economic environment, facilitated by the availability of sites and informed by character considerations.

Lewisham Town Centre will have been transformed into a shopping and leisure destination of exceptional quality, offering a strong focus for community identity and cohesion. The centre will benefit from the Lewisham Gateway site delivering easier and better pedestrian routes between the bus and train stations and the high street, a new road layout and new commercial, retail and residential development. New high quality residential developments will help to increase the number and diversity of people using the centre and support its Metropolitan Town Centre status. The street market will continue to provide an extensive range of goods and its overall contribution to the quality of the urban environment will be improved. The Quaggy and Ravensbourne Rivers will be celebrated by the provision of a network of public green spaces and parks including Cornmill Gardens. A new landscaped public plaza where these two rivers meet will consolidate the identity of Lewisham as a river valley town and provide an enhanced sense of place and focus.

Deptford and New Cross will become a sustainable location with a high quality environment, where an increasing number of businesses wish to locate, and where people choose to live, supported by new community facilities and public transport. The area will build on its prestigious art and educational institutions (Goldsmiths College University of London, Trinity Laban and the Albany Theatre) to become a thriving centre for creative businesses. Both Deptford High Street and New Cross Road will be vibrant local shopping areas. Deptford High Street will sustain its role in providing a highly varied selection of goods sold by individual traders with a bustling street market at its heart.

Deptford and New Cross will have improved connected street networks, particularly walking and cycling links. Connections to the rest of the borough and London will be easier. The streets, walkways and parks will be of an excellent standard, having taken full advantage of their proximity to the River Thames and local waterways.

The north of the borough will have been transformed by the regeneration of large strategic sites that will provide new places for people to enjoy, and new facilities to support existing and new communities. New development will provide a mix of jobs, training opportunities and high quality homes including housing for families to meet local need, and will have helped to improve residents' quality of life, health and well-being. The physical environment for businesses, and availability of suitable premises will have improved. The local economy will be more diverse and will cater for new and growing sectors including green industries, and service businesses that take advantage of the area's close proximity to central London, and will cater for traditional industrial activities and sites accommodating necessary infrastructure essential to the functioning of London. Millwall Stadium will become an attractive and inclusive leisure destination for all the community. Convoys Wharf will see the re-opening of wharf uses to provide a sustainable facility for the river transport of cargo in association with a new mixed use development providing local jobs and new homes.

Catford Town Centre, home of the council's services and the civic heart of the borough, will be a lively, attractive town centre focused around a high quality network of public spaces. Driven by the redevelopment of key opportunity areas, including the redevelopment of the former Catford Greyhound Stadium site and the Shopping Centre, Catford will have an improved retail offer and will be home to a diverse residential community. The Broadway Theatre and Studio will continue to be a focus for arts and cultural activities and the market will continue to contribute to Catford's identity.

Outside the key areas of physical regeneration, the pleasant character of the many high quality residential neighbourhoods will have been retained by development that is sensitive to context and appropriate in size and scale to its location. The borough will have enhanced its unique assets including the preservation of historic sites and conservation areas; the protection and improvement of parks, gardens and open space and river networks such as the Waterlink Way, South East London Green Chain and the East London Green Grid; improved public transport links; and a network of vibrant major streets connecting and supporting places within and beyond the borough.

Vibrant hubs of local activity, centred on the district and local centres of Blackheath, Downham, Forest Hill, Lee Green, Sydenham, Hither Green and Brockley Cross, will anchor residential areas, deliver essential shops and services needed for daily life and provide enjoyable places for people to meet and use, and will be supported by locally significant business areas. These centres will also be supported by a network of viable local shopping centres and parades such as Crofton Park, Lewisham Way and Grove Park that will provide accessible services and facilities reducing the need to travel.

People living in the Bellingham, Whitefoot and Downham wards will have benefited from the various social and economic programmes addressing and improving health, education, and local employment and training.

Communities across the borough will rely on effective local and excellent facilities to support their day to day life, including the following services: health, education, community, arts, cultural, entertainment, leisure, sports and recreation. All secondary and primary schools will have been rebuilt or refurbished, contributing to improved educational standards. The completion of the East London Line extension (the London Overground) and the Thameslink programme will ensure better connections for the borough to London and beyond.

Lewisham will draw on the resources of all in the community and work together with its partners to deliver the vision to ensure that by 2026 it has capitalised on its many opportunities over the past 15 years.

## **CORE STRATEGY STRATEGIC OBJECTIVES**

### *Regeneration and growth areas*

Core Strategy Objective 1: Physical and socio-economic benefits

Regeneration and redevelopment opportunities in Lewisham, Catford, Deptford and New Cross, through the delivery of new homes and jobs, will be used to secure substantial physical and environmental improvements and socio-economic benefits throughout the area to improve deprivation.

### *Providing new homes*

Core Strategy Objective 2: Housing provision and distribution

Provision will be made for the completion of an additional 18,165 net new dwellings from all sources between 2009/10 and 2025/26 to meet local housing need and accommodate the borough's share of London's housing needs. This aims to exceed the London Plan target for the borough. Of these:

- 2,600 will be distributed within the Lewisham Town Centre
- 1,750 will be distributed within the Catford Town Centre
- 10,625 will be distributed within Deptford and New Cross

- 3,190 will be distributed across the remainder of the borough.

#### Core Strategy Objective 3: Local housing need

Provision will be made to meet the housing needs of Lewisham's new and existing population, which will include:

- provision of affordable housing
- a mix of dwelling sizes and types, including family housing
- lifetime homes, and specific accommodation to meet the needs of an ageing population and those with special housing needs and
- bringing vacant dwellings back into use.

#### *Growing the local economy*

#### Core Strategy Objective 4: Economic activity and local businesses

Investment in new and existing business and retail development will be facilitated to improve the physical environment for commercial enterprises, to result in a year on year sustainable increase in the size of the borough's economy through:

- protecting and developing a range of employment and training opportunities in the borough
- retaining business and industrial land that contributes to the industrial and commercial functioning of London as a whole, and/or which supports the functioning of the local economy including premises for the creative industries, green industries, business services and other employment growth sectors
- ensuring the future growth of the local economy by the mixed use redevelopment of identified industrial sites that require extensive physical investment and improvement
- developing Lewisham town centre to promote it to a Metropolitan Town Centre by 2026, and maintain the status of Catford as a major town centre, with a focus on quality design and development protecting and enhancing the district shopping centres, local shopping centres, parades and the range of farmers' and street markets, as providers of sustainable local shopping facilities and services to continue to support basic community needs.

#### *Environmental management*

#### Core Strategy Objective 5: Climate change

The Council with its partners will take action to ensure that climate change is adapted to and mitigated against, including those measures necessary to create a low-carbon borough and reduce carbon emissions by:

promoting resource and water efficiency maximising generation and use of renewable energy and locally distributed energy, particularly for major development sites building to high standards of sustainable design and construction reducing waste generation supporting environmental protection and enhancement including establishing ecological networks minimising the environmental impacts of development including water, noise and air pollution.

#### Core Strategy Objective 6: Flood risk reduction and water management

The Council with its partners will take action to protect the borough from the risk of flooding and reduce the effects of flooding from all sources, including the Thames, Ravensbourne, Quaggy and Pool rivers, and manage improved water quality by: using the Environment Agency's sequential and exception tests to allocate land for development requiring river restoration and appropriate flood defences as part of development proposals, where appropriate ensuring appropriate local flood defences are maintained and provided for and requiring sustainable urban drainage systems in new development, wherever feasible.

#### Core Strategy Objective 7: Open spaces and environmental assets

The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by: protecting all open space including Metropolitan Open Land protecting Sites of Nature Conservation Importance and supporting and promoting local biodiversity requiring green roofs and walls where appropriate implementing the Street Tree Programme improving the quality of, and safeguarding access to, all public open space providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and river and waterways network and the Thames path.

#### Core Strategy Objective 8: Waste management

Deliver sustainable waste management by implementing the waste hierarchy of prevent, reuse, compost and recycle, and safeguarding sites within the Surrey Canal Strategic Industrial Location to meet Lewisham's waste apportionment of 323,000 tonnes by 2020.

#### *Building a sustainable community*

#### Core Strategy Objective 9: Transport and accessibility

Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people's access needs while reducing the need to travel and reliance on the private car. This will: promote choice and better health facilitate sustainable growth in the key localities for regeneration and growth (Lewisham, Catford, Deptford, New Cross) improve integration, accessibility and connectivity within the borough and the London sub-region.

The Council will ensure that transport and accessibility within the borough: provides for a system of walking and cycling routes and strong links to town centres and public open space, including the Waterlink Way, and promotes the implementation of greenways improves accessibility in the Evelyn, Whitefoot, Bellingham and Downham wards facilitates the movement of freight while minimising the adverse impacts of traffic, noise and emissions delivers key infrastructure projects including the Thameslink programme, the lower 'h' road at Lewisham, removal of the Kender gyratory system and safeguarding provision for the Surrey Canal station as part of the London Overground network.

#### *Core Strategy Objective 10: Protect and enhance Lewisham's character*

Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets and their settings, local rivers and landscapes, yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean: ensuring that new development achieves high standards of urban design and residential quality and contributes to a sense of place and local distinctiveness ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment preserving or enhancing the borough's conservation areas, listed buildings and the other identified elements of the historic environment including archaeological remains.

#### *Core Strategy Objective 11: Community well-being*

The Council with its partners will provide and support measures and initiatives that promote social inclusion and strengthen the quality of life and well-being for new and existing residents of the borough by: addressing deprivation and health inequalities particularly within the wards of Evelyn, New Cross, Lewisham Central, Whitefoot, Bellingham and Downham creating safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies providing physical, social and green infrastructure, including high quality health and education facilities, that are accessible and suitable to all of Lewisham's residents, to foster independent community living.

## APPENDIX 3: Plans, programmes and objectives

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>INTERNATIONAL</b>			
<p>Agenda 21 Declaration</p> <p>Rio de Janeiro (1992)</p> <p>Convention on Biological Diversity, Rio de Janeiro (1992)</p>	<p>Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993. It has 3 main objectives:</p> <ul style="list-style-type: none"> <li>• conserve biological diversity</li> <li>• sustainable use of biological diversity</li> <li>• fair and equitable sharing of the benefits of biological diversity.</li> </ul>	<p>Sustainability principles must underpin the AAP and its policies. This involves the integration and balancing of economic, environmental and social objectives into the AAP.</p> <p>Ensure that the protection and enhancement of the borough's biodiversity is accounted for in the AAP.</p>	<p>SA objectives must ensure sustainability underpins all aspects of the AAP.</p> <p>SA objectives must ensure that biodiversity conservation is adequately factored into AAP policies and other DPDs.</p>
<p>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</p>	<p>Contains the key obligation requiring the reduction in anthropogenic CO<sub>2</sub> levels to at least 5% below 1990 levels by 2012.</p>	<p>The AAP must contain policies that address and mitigate the impact of climate change.</p>	<p>Supporting programme.</p>
<p>The World Summit on Sustainable Development (WSSD), Johannesburg Declaration</p> <p>on Sustainable Development</p> <p>(Proponent body United Nations)</p> <p>2002</p> <p>Status: Statutory</p>	<p>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>Reaffirmed UK commitment to sustainable development.</p>	<p>Supporting programme.</p>
<b>EUROPEAN UNION</b>			
<p>European spatial declaration on sustainable development</p> <p>Proponent body European Union</p>	<p>The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>Reaffirmed UK commitment to sustainable development.</p>	<p>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
<p>1999</p> <p>Status: voluntary</p> <p>European Spatial Development Perspective (1999)</p>	<p>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>AAP should seek to maximise resource sustainability and respect and preserve the existing historical and cultural landscape of Lewisham as far as possible. The AAP achieves this through the ongoing protection of the borough's conservation areas and policies promoting sustainable design.</p>	<p>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>EU Sustainable Development Strategy (2001)</p>	<p>Proposes measures to deal with important threats to the well-being of people in the EU such as climate change, poverty and emerging health risks.</p>	<p>Sustainability principles must underpin the AAP and all its policies. This involves the integration and balancing of economic, environmental and social objectives into the AAP.</p>	<p>SA objectives should ensure sustainability underpins all aspects of the AAP.</p>
<p>European Community Biodiversity Strategy 1998</p>	<p>Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).</p>	<p>The AAP and other DPDs must seek to protect and enhance biodiversity levels in the borough.</p>	<p>The SA objectives should include the protection and enhancement of biodiversity.</p>
<p>Sixth Environment Action Programme of the European Community 2002 - 2012</p> <p>Status: voluntary</p>	<p>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>The AAP should seek to address these priority areas for action.</p>	<p>Supporting programme.</p>
<p>Air Quality Framework Directive (96/62/EC) and daughter Directives</p> <p>Status: Statutory</p>	<p>The Directives aim to reduce specified air pollutants.</p>	<p>AAP requires robust policies relating to improving air quality, which will help to reach attainable targets that are set within the SEA Framework.</p>	<p>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>Directive 2003/87/EC</p>	<p>Introduces an EU wide emissions trading scheme in order to meeting the Community's commitment to achieving an 8% reduction in</p>	<p>AAP strategic objectives must focus on reducing the boroughs overall carbon footprint in all planning related</p>	<p>The SA objectives must reflect the carbon reduction targets detailed in the Directive and other national</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	emissions of greenhouse gases by 2008 to 2012 compared to 1990 levels, and the longer term commitment to reduce global emissions of greenhouse gases by approximately 70% compared to 1990 levels.	areas.	legislation.
Landfill Directive 99/31/EC	The Directive places limits on the amounts of biodegradable waste sent to landfill sites.	The AAP policies should aim to reduce waste generation by implementing the waste hierarchy.	The SA objectives must aim to minimise waste generation and maximise sustainable waste management in the borough.
Framework Waste Directive (Directive 75/442/EEC, as amended)  Status: Statutory	The Directive seeks to reduce the quantity of waste going to 'final disposal' by 20% from 2000 to 2010, and by 50% by 2050, with special emphasis on cutting hazardous waste.	The AAP policies must seek to implement the waste hierarchy in order to meet the required target for waste minimisation.	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.
Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora)  Status: Statutory	Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species	Requirement to include an Appropriate Assessment at preferred options stage and policies to protect listed species and habitats included in the Habitats directive.	Supporting programme.
Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds)  Status: Statutory	The maintenance of the favourable conservation status of all wild bird species across their distributional range.	The AAP will be required to contain policies that protect bird species and their habitats generally but is obliged to do so with regard to species listed in the Birds Directive.	Supporting programme.
Water Framework (2000/60/EC)  Status: Statutory	To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe's waterways.	The AAP is required to include policies on protection and enhancement of water courses and reduce urban wastewater discharge into the river systems.	Supporting programme.
EU Sixth Environmental Action Plan (2002)	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.	The AAP should include robust policies at protecting and enhancing the overall environment in the borough.	SA objectives must include measures aimed at improving overall environmental quality.
<b>NATIONAL</b>			
Environmental Assessment of Plans & Programmes Regulations 2004	No targets  Transposes the SEA directive into UK law	Given effect through PPS12 and SA of Regional Spatial Strategies and LDFs – Consultation Paper	The SA structure and content must reflect that outlined in the regulations and associated

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<p>Status - Statutory</p> <p>Planning and Compulsory Purchase Act 2004</p> <p>Status - Statutory</p>	<p>No targets</p>	<p>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 SA to accompany certain planning documents.</p>	<p>guidance note</p> <p>The SA structure and content must reflect that outlined in the regulations and associated guidance note</p>
<p>Town and Country Planning Act 1990</p> <p>Status - Statutory</p>	<p>No targets</p>	<p>Set out the procedures for the preparation, approval and adoption of development plans and for the control of development. Certain parts of the Act need to be adhered to in preparing the LDF.</p>	<p>Although not directly relevant the SA needs to comply with legislative requirements.</p>
<p>Planning and Energy Act 2008</p> <p>Status - Statutory</p>	<p>An Act to enable local planning authorities to set requirements for energy use and energy efficiency in local plans.</p>	<p>The AAP can include policies aimed at increasing the proportion of energy generated from renewable energy sources.</p>	<p>The SA objectives should include measures to mitigate against the effects of climate change.</p>
<p>Energy Act 2008</p> <p>Status - Statutory</p>	<p>Among other energy matters, this Act makes provision for electricity generated from renewable sources.</p>	<p>The legislation provides an enabling mechanism for the AAP to make provision for decentralised renewable energy generation.</p>	<p>The SA objectives should include measures to mitigate against the effects of climate change.</p>
<p>Use Classes Amendment Order 2005</p> <p>Status - Statutory</p>	<p>Two new use classes are introduced - A4 Drinking Establishments and A5 hot food take aways.</p>	<p>The AAP can seek to adopt policies that can control the concentration of these uses in the borough in order to enhance the borough's character.</p>	<p>The SA objectives should include measures aimed at preserving diversity of retail uses in town centres (major, district and local).</p>
<p>UK Climate Change Act (2008)</p> <p>UK Strategy for sustainable development</p>	<p>The net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline</p> <p>Living within environmental limits</p> <p>Ensuring a strong, healthy and just society</p> <p>Achieving a sustainable economy</p> <p>Promoting good governance</p> <p>Using sound science responsibly</p>	<p>The Site Allocations DPD should reflect objectives for climate change mitigation and adaptation</p> <p>These objectives must be considered in the allocation of sites</p>	<p>The sustainability objectives should consider climate change to ensure that the Site Allocations DPD contributes to the target.</p> <p>The objectives have been used to develop the sustainability objectives.</p>
<b>NATIONAL PLANNING POLICIES</b>			
<p>Planning Policy Statement (PPS) 1:</p>	<p>Sets out the overarching planning principles</p>	<p>The AAP must complement PPS1.</p>	<p>The SA objectives must reflect the</p>

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Delivering sustainable development	<p>and policies on the delivery of sustainable development through the planning system. These policies complement, but do not replace or override, other national planning policies and should be read in conjunction with other relevant statements of national planning policy.</p>	Policies must be worded to enable the council to adopt more detailed implanting strategies to achieve the objectives of PPS1.	concept of sustainable development as outlined in PPS1.
PPS: Planning and Climate Change – Supplement to PPS 1 (2007)	Sets out how planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and resilient to the climate change now accepted as inevitable.	The AAP must provide a framework that promotes and encourages renewable and low carbon energy generation. Policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure.	The SA objectives should include measures to mitigate against the effects of climate change.
Draft PPS: Planning for a Low Carbon Future in a Changing Climate	Sets out a planning framework for securing enduring progress against the UK's targets to cut greenhouse emissions and use more renewable and low carbon energy, and to plan for the climate change.	The AAP should fully support the transition to a low-carbon future in a changing climate.	The SA objective should mitigate and adapt to the impacts of climate change.
PPG2 Green belts	Outlines the manner of designation and safeguarding of green belts to complement the London Plan's objective to safeguard Metropolitan Open Land.	The AAP must be prepared in conformity with the requirements of PPG 2.	The SA objectives must include the protection of open space, green belts and biodiversity.
PPS3 Housing	Sets out the complementary relationship between planning and the need for housing provision	The AAP must detail how and where allocated housing numbers will be accommodated in the borough over the plan period.	The SA objectives must include the provision of sufficient housing of an appropriate standard, mix and tenure.
PPS 4: Planning for Sustainable Economic Growth	Sets out the Government's comprehensive policy framework for planning for sustainable economic development in urban and rural areas.	The AAP must take this PPS into account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.	The SA objectives must encourage sustainable economic growth and development.
PPS 5: Planning for the Historic Environment	The PPS's overarching aim is that historic environment and its heritage assets should be conserved and enjoyed for the quality of life they bring to this and future generations.	The AAP must take this PPS into account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.	The SA objectives must conserve and enhance the historic environment and heritage assets.
PPS5 Planning for the Historic	This document is designed to assist local	The AAP must take this PPS into	The SA objectives must conserve

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Environment: Historic Environment Planning Practice Guide	authorities and other stakeholders in implementing PPS5.	account, and the policies in this PPS are a material consideration which must be taken into account in development management decisions, where relevant.	and enhance the historic environment and heritage assets.
PPS9 Biodiversity and geological conservation	Local authorities must take into account the protection of existing biodiversity and geological resources within their jurisdiction in making planning decisions	The AAP should seek to protect and enhance the boroughs local biodiversity and geological features wherever possible.	The SA objectives should include measures to protect and enhance the borough's local biodiversity and geographical resources.
PPS10 Planning for sustainable waste management	Sets out the Government's policies on sustainable waste management and provides guidance on LDF preparation and on determining planning applications.	The AAP must include a policy on sustainable waste management that takes local conditions into account.	The SA objectives must seek to minimise waste generation and increase recycling.
PPS12 Local spatial planning	Sets out the Government's policy on the preparation of LDFs.	The AAP must be prepared in conformity with the requirements of PPS12.	The SA must comply with the requirements of s19(5) of the Planning and Compulsory Purchase Act 2004 and should appraise the economic, social and environmental sustainability of the plan.
PPG13 Transport	Integrate land use planning and transport at national, regional and local levels in order to promote sustainability objectives including sustainable transport, accessibility and social inclusion.	The AAP must include policies that promote sustainable urban design principles that will in turn reduce the need for travel, increase accessibility and promote the use of sustainable transport.	The SA objective must include measures to reduce car dependence and encourage sustainable forms of transport.
PPG14 Development on unstable land	Advice on development of unstable land to ensure that the physical constraints are accounted for when planning developments.	The AAP must take account the requirements of the PPG 14.	The SA objectives should ensure safety levels are considered in site selection for future development.
PPG17 Planning for open space sport and recreation	Criteria for assessing the need for recreational and leisure facilities and identifying deficiencies in public open space.	The AAP should contain policies that seek to protect existing open space from inappropriate development.	SA objectives must include measures that protect and maintain adequate levels of open space and aim to improve the health and well-being of the population by promoting suitable strategies including those to improve the level of accessibility to leisure facilities in the borough.
PPG19 Outdoor advertisement control	Aims to ensure that outdoor advertising contributes positively to the appearance of an attractive and cared-for environment.	The AAP should include policies that promote best practice urban design principles that are sensitive to the local context.	The SA objectives should contain measures that seek to enhance the borough's streetscape.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
PPS22 Renewable energy	The emphasis is on the promotion of renewable energy via the planning system.	The AAP must be prepared in conformity with the requirements of PPS 22.	The SA objectives must include measures to encourage the use of renewable energy in order to mitigate against climate change.
PPS23 Planning and pollution control	Sets out the Government's strategy on planning and pollution control, including contaminated land.	The AAP must be prepared in conformity with the requirements of PPS23.	The SA objectives should contain measures that seek to minimise pollution.
PPS 25 Development and flood risk	Sets out Government policy on development and flood risk	The AAP must adopt policies that manage and mitigate against the risk of flooding and adopt a robust approach to avoiding inappropriate development in high risk areas.	SA objectives must include measures to minimise and mitigate against the risk of flooding.
Draft PPS: Planning for a Natural and Healthy Environment	Sets out the vision for conserving and enhancing biological diversity in England and includes the broad aim that planning, construction, development and regeneration should have minimal impacts on biodiversity and geodiversity through the planning system.	The AAP must promote opportunities for the incorporation of beneficial biodiversity and geological features within the design of development, and to maintain networks of natural habitats by avoiding their fragmentation and isolation.	The SA objectives must protect open space and conserve natural habitats, biodiversity and geodiversity, and enhance its access routes.
Community Infrastructure Levy: An overview (2010)	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' development plans.	Infrastructure planning is fundamental to the delivery of the vision for the area, as expressed in the Sustainable Community Strategy and AAP. Charging authorities should formally implement CIL on the basis of an up-to-date development plan, and must produce a charging schedule settling out the CIL rates in their area. The CIL rates should not put at serious risk the overall development, and use evidence to strike an appropriate balance between the desirability of funding infrastructure planning	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.
By Design: Urban Design in the planning system (2000)	Sets out the Government's aim to encourage better urban design.	The AAP should include policies promoting good urban design that is relevant to the local context.	SA objectives must include those promoting sustainable urban design principles.
Planning and access for disabled people: A good practice guide	The guide aims to improve accessibility levels for disabled people by the adoption of	The AAP should include a policy ensuring accessibility for people with	The SA objectives must include measures that improve accessibility

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	appropriate urban design strategies.	disabilities both in the public realm and proposed developments in order to maximise the potential for social inclusion.	for all people in the community.
Education and skills – delivering results a strategy to 2006 (revised 2002)	The Strategy seeks to improve learning and skills for children, young people and adults in the community.	The AAP should, as part of its emphasis on sustainability, adopt planning policies that maximise the opportunities for learning in the borough. Doing so will enhance the overall quality of life for residents.	The SA objectives should include a measure providing for the improvement of education and skill levels in the borough.
Sustainable development action plan for education and skills (2003)	The Strategy seeks to improve learning and skills for children, young people and adults in the community in order to create a more sustainable society.	The AAP should, as part of its emphasis on sustainability, adopt planning policies that maximise the opportunities for learning in the borough. Doing so will enhance the overall quality of life for residents.	The SA objectives should include a measure providing for the improvement of education and skill levels in the borough.
Delivering choosing health: making healthier choice easier (2004)	The overarching objective of the Department of Health’s PSA is to improve the health of the population. The plan recognises the vital importance of co-delivery between local government and the NHS in partnership with local communities.	The AAP should contain a policy that aims to promote health care in collaboration with key stakeholder agencies such as the PCT and local hospital trusts.	The SA objectives should contain a measure to improve the health and well-being of the population.
CLG employment land reviews: guidance note, December 2004	The objective of the strategy is to ensure that the best employment sites are protected from incompatible land uses.	The AAP, in accordance with a suitable evidence base, should adopt a policy on protecting strategically important employment land in order to ensure the ongoing growth of the local economic base.	In accordance with sustainability principles, the SA objectives should seek to integrate the need to protect important employment land with other desirable land uses.
A new deal for transport: better for everyone (1998)	This strategy expresses a commitment to create better, more integrated transport system to tackle the problems of congestion and pollution.	The AAP must adopt a comprehensive sustainable transport policy approach. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), sustainable forms of transport and managing car parking.	The SA objectives should promote a range of measures aimed at promoting sustainable transport to reducing carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.
Transport 2010: Meeting the local transport challenge (2000)	The strategy is a long term commitment to increase investment in the transport system in order to improve rates of patronage rates on sustainable modes of travel.	As local authorities have a crucial role in the delivery of this strategy, the AAP must include policies that aim to complement the strategy by adopting	The SA objectives should promote a range of measures aimed at promoting sustainable transport in reducing the boroughs carbon

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
		‘best practice’ urban design principles.	emissions. This can include sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.
The future of transport White Paper (2004)	<p>The Strategy is built around three central themes:</p> <ul style="list-style-type: none"> <li>• sustained investment over the long term</li> <li>• improvements in transport management.</li> </ul>	The AAP must adopt a comprehensive policy approach aimed at promoting sustainable transport in the borough. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), promoting sustainable forms of transport and managing car parking.	The SA objectives should promote a range of measures aimed at promoting sustainable transport in reducing the boroughs carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.
UK Air Quality Strategy ‘Working together for clean air’	The primary objective of the strategy is that everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.	Local authorities are encouraged to develop their own strategies and advice on air quality.	The SA objectives must include measures that aim to improve ambient air quality in the borough.
Homes for the future – more affordable, more sustainable	Everyone to have access to a decent home at a price which they can afford, in a location where they would like to live and work.	The allocation of housing land should be based on the principles of Homes for the Future.	The sustainability objectives must reflect access to affordable housing.
Our energy, our future, creating a low carbon economy	To replace and update energy infrastructure to address depleting energy resources and climate change.	The use of resources and access to renewable energy should inform the allocation of housing, employment and mixed use development sites.	The use of resources and the potential for renewable energy should be addressed.
Transport and the Historic Environment (English Heritage, 2004)	Identifies potential transport impacts on the historic environment, for example, from traffic and transport infrastructure, and opportunities to invest into the historic environment and the settings of heritage assets.	The AAP must adopt a comprehensive sustainable transport policy approach. This would involve urban design policies aimed at reducing the need to travel (promoting mixed use developments), sustainable forms of transport and managing car parking.	The SA objectives should promote a range of measures aimed at promoting sustainable transport to reduce carbon emissions. This can include objectives promoting sustainable urban design to reduce the need to travel and encouraging sustainable modes of travel.
Climate Change and the Historic Environment (English Heritage, 2007)	Provides an overview of climate change impacts on the historic environment and of the impacts associated with responses to climate change.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and	The SA should include objectives to support the protection and enhancement of historic assets.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
		streets upon historic assets should form a basis for reviewing the suitability of development.	
Draft Guidance on Setting (English Heritage, 2010)	Shows how the settings of heritage assets should be defined in a development planning context, and how they should be managed.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.	The SA should include objectives to support the protection and enhancement of historic assets.
Understanding Place (2010)	Sets out a best-practice approach to historic area assessment as the basis for well-informed decisions regarding historic character.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.	The SA should include objectives to support the protection and enhancement of historic assets.
Building in Context (English Heritage, CABE 2007)	Provides case-study examples of how new development can respond well to historic character in terms of design.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.	The SA should include objectives to support the protection and enhancement of historic assets.
Seeing History in the View (English Heritage, 2010)	Shows how historic views should be defined and provides principles for their management to protect historic significance.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the	The SA should include objectives to support the protection and enhancement of historic assets.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
		suitability of development.	
Streets for All (English Heritage, 2006)	Shows how public realm upgrades can be designed to be appropriate to and enhance the historic environment.	The AAP should adopt a comprehensive policy approach to the protection and enhancement of heritage assets. The cumulative effects of transport, climate change, setting, place, context, views and streets upon historic assets should form a basis for reviewing the suitability of development.	The SA should include objectives to support the protection and enhancement of historic assets.
Waste Strategy for England	<p>Reduce waste by making products with fewer natural resources</p> <p>Break the link between economic growth and waste growth</p> <p>Most products should be used or their materials recycled</p> <p>Energy should be recovered from other wastes where possible</p>	The strategy is particularly relevant to the waste site allocations; these should reflect the objectives of the strategy.	An objective for waste should be included in the sustainability objectives.
<b>REGIONAL</b>			
<b>The Mayor's Air Quality Strategy (2002)</b>	The Strategy concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem.	The AAP 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.	The SA objectives should include a measure aimed at improving air quality.
<b>The Mayor's Economic Development Strategy (2001)</b>	The Strategy aims to promote healthy living and help people participate in London's economy.	The AAP should include policies that promote healthy lifestyles in order to allow people to actively engage in London's economic growth.	The SA objectives should include measures that seek to encourage sustainable economic growth.
<b>The Mayor's Biodiversity Action Plan (2002)</b>	This Strategy sets policies and proposals to protect and care for London's biodiversity. Key aims include encouraging the greening of the built environment and the use of open spaces in ecologically sensitive ways.	The AAP should include policies that protect wildlife habitat and recognise opportunities for enhancement of biodiversity in the borough.	The SA objectives should contain measures that seek to protect and enhance biodiversity.
<b>London Biodiversity Partnership</b>	The partnership aims to protect and enhance the capitals habitats and species	The AAP should include policies that protect wildlife habitat and recognise	The SA objectives should contain measures that seek to protect and

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>Action Plan (1996)</b>	for future generations to enjoy.	opportunities for enhancement of biodiversity in the borough.	enhance biodiversity.
<b>The Mayor's Cultural Strategy (2004)</b>	The Strategy sets out the Mayor's proposals for developing and promoting cultural life in London, focusing on four key objectives: excellence, creativity, access and value.	The collective AAP policies should aim to improve the cultural and social aspects of life in the borough.	The collective SA objectives should aim to ensure the enhancement of cultural and social growth in the borough.
<b>London's Warming – The impacts of Climate Change (2002)</b>	The Study aims to identify the threats and opportunities presented by climate change.	The AAP policies should seek to complement the findings of the study.	The SA objectives should be underpinned by the overriding objective of reducing the impacts of climate change.
<b>Streets For All: A Guide to the management of London's Streets – English Heritage (2000)</b>	A good practice guide to street scene design, promoting excellence in materials use and workmanship to improve the urban environment and public realm.	The AAP policies on urban design should aim to improve the quality of the borough's public realm and overall streetscape.	The SA objectives should collectively aim to result in an improvement to the borough's streetscape and public realm.
<b>Guide to Preparing Open Space Strategies (2004)</b>	The Guide aims to assist boroughs in producing an open space strategy and establish a common framework for benchmarking and strategic planning in London.	The AAP should adopt policies on protecting open space that are in compliance with the Guide.	SA objectives should include measures to protect and enhance the quality of existing open space.
<b>Empty Homes in London (2004)</b>	The Report highlights the issue of empty homes London. It also sets out the current position with regard to the number of empty homes, summarises recent policy developments and gives information on the activities of the London boroughs, the Empty Homes Agency and the GLA.	The AAP policy on housing should take into account the recommendations of this report.	SA objectives should seek to ensure that sufficient numbers of new dwellings will be provided in the borough in order to accommodate the growth in population.
<b>The Mayor's Transport Strategy (2010)</b>	The MTS details priority areas for transport that directly or indirectly, benefit the environment and the London community.	The AAP policies should aim to complement the transport priorities for action set out in the Strategy.	SA objectives should contain measures that seek to reduce the need for car travel and encourage sustainable modes of transport.
<b>The London Plan (2008)</b>	The London Plan sets out strategic policies for spatial planning and development across London. The overall aim of the London Plan is to ensure London develops in a sustainable manner.	The AAP policies must be consistent with the London Plan as it legally constitutes a DPD.	The SA objectives must be in compliance with the policy objectives contained in the London Plan.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>The draft London Plan (2010)</b>	As above, the draft London Plan updates the London Plan to ensure that London develops in a sustainable manner.	The Site Allocations DPD should reflect emerging policy, which represents current thinking.	The sustainability objectives should reflect the Integrated Impact Assessment of the emerging London Plan.
<b>Mayor of London's Municipal Waste Management Strategy (2008)</b>	The overall objective of the strategy is to reduce London's waste generation by 2020 and to sustainably manage the waste that is created. Waste reduction targets are detailed in the strategy.	The AAP should contain a policy on waste management that ensures compliance with the London Plan and also ensures that the objectives of the waste hierarchy.	The SA objectives must include measures that seek to reduce waste production and sustainably manage waste.
<b>NHS and Urban Planning in London – Final Report (2003)</b>	The purpose of the report is to describe how the NHS can engage more effectively in London's urban planning agenda. The report seeks to develop a clear understanding on the likely healthcare demands associated with projected population and housing increases.	The AAP policies must take into account the relationship between healthcare provision and the demands associated with the projected population and housing increases. The infrastructure planning evidence base justifying the AAP should detail the adequacy of healthcare infrastructure and its location, in relation to the projected population and housing growth.	The SA objectives should contain a measure that aims to ensure the ongoing health and well being of the population.
<b>'Supplementary Guidance on the protection of strategic views In London</b>	The main objective of the guidance in relation to the borough is to protect two strategic views of St Paul's Cathedral that pass through Lewisham.	The AAP policy on urban design must include a measure to ensure that new developments do not compromise strategic views.	The SA objectives must include a measure to maintain and enhance townscapes and streetscapes. This would include the need to protect strategically important views.
<b>The London Road Safety Plan (2001)</b>	The Plan seeks to reduce traffic congestion and increase safety by use of public transport, walking and cycling. Local boroughs are requested to prepare a Road Safety Plan and take this into consideration when preparing strategic planning documents.	The AAP policies should aim to improve road safety generally by seeking to reduce car use by the promotion of sustainable transport modes and improving the urban design of streets wherever possible.	SA objectives can improve road safety by aiming to reduce car travel and promoting sustainable transport modes.
<b>GLA Supplementary Planning Guidance on Employment Land</b>	The Guidance details criteria for judging the suitability of land for retention for employment purposes.	The AAP should ensure that suitable amounts of employment land are protected from conflicting land uses.	The SA objectives should include measures that encourage and promote employment and attract new employment opportunities to Lewisham.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>The Mayor's Ambient Noise Strategy</b>	Minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practises and technology.	Protect noise sensitive land uses from noisy development and activities.	The SA objectives should include measures to minimise adverse effects of noise by separating incompatible land uses or mitigating against existing impacts.
<p data-bbox="91 373 591 603"><b>Mayor of London 'Green Light to Clean Power' Energy Strategy</b></p> <p data-bbox="91 603 591 1114"><b>London Housing Strategy (2010)</b></p> <p data-bbox="91 1114 591 1227"><b>Revised London View Management Framework 2009</b></p>	<p data-bbox="591 373 1144 603">The strategy seeks to minimise the effect of London's energy production by reducing London's contribution to climate change by minimising emissions of carbon dioxide through energy efficiency, combined heat and power, renewable energy and hydrogen.</p> <p data-bbox="591 603 1144 946">Raise aspirations and promote opportunity: by producing more affordable homes, particularly for families, and by increasing opportunities for home ownership through the new First Steps housing programme;</p> <p data-bbox="591 946 1144 1114">Improve homes and transform neighbourhoods: by improving design quality, by greening homes, by promoting successful, strong and mixed communities and by tackling empty homes;</p> <p data-bbox="591 1114 1144 1227">Maximise delivery and optimise value for money: by creating a new architecture for delivery, by developing new investment models and by promoting new delivery mechanisms.</p>	<p data-bbox="1144 373 1621 603">The AAP should be consistent with London Plan renewable energy targets. Decentralised renewable energy should also be promoted in appropriate developments in order to reduce the borough's carbon footprint.</p> <p data-bbox="1144 603 1621 1114">The Site Allocations DPD housing allocations should reflect the principles of the London Housing Strategy.</p> <p data-bbox="1144 1114 1621 1227">Consider the impact of site allocations on strategic views and the historic environment</p>	<p data-bbox="1621 373 2096 603">The SA objectives must include a measure to promote the efficient use of natural resources.</p> <p data-bbox="1621 603 2096 1114">Sustainability objectives should consider the quality and affordability of housing supply.</p> <p data-bbox="1621 1114 2096 1227">Sustainability objectives should include the quality of the townscape.</p>
<b>London Tree and Woodland Framework</b>	Plant the right trees in the right places to enhance the environment and quality of life.	Link to AAP and Development Management policies on trees.	Sustainability objectives should relate to landscape features, including trees.
<b>Thames Catchment Flood Management Plan &amp; TE2100 Plan</b>	Provides an overview of the flood risk in the Thames catchment (including the Ravensbourne catchment) and sets out our preferred plan for sustainable flood risk	The AAP should take the findings of the Thames Catchment Flood Management Plan into account when developing its preferred spatial plan	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	management over the next 50 to 100 years.	for the town centre.	town centre.
<b>Thames River Basin Management Plan (2009)</b>	About the pressures facing the water environment in this river basin district, and the actions that will address them. The Ravensbourne catchment falls within the "London catchment" described as "highly urbanised".	The AAP should take the findings of the Thames River Basin Management Plan into account when developing its preferred spatial plan for the town centre.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the town centre.
<b>LOCAL</b>			
<b>Lewisham Unitary Development Plan (2004)</b>	The UDP sets out the Council's statutory planning policies on a number of elements including urban design and construction, open space, environmental protection, housing, sustainable transport and parking, employment, town centres and education, leisure and community facilities.	The AAP should enable saved UDP policies to be incorporated into the LDF.	SA objectives should be used to appraise all AAP policies that can lead to saved UDP policies from being included in the LDF.
<b>Lewisham Sustainable Community Strategy (SCS)</b>	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 AAP's vision for the borough.	The AAP vision should be informed by that of the SCS. The AAP also needs to be in broad conformity with the SCS objectives.	The SA objectives will appraise all elements of the AAP including the vision which is derived from the SCS.
<b>Community Safety Strategy (2008-2011) (SCS)</b> <b>Safer Lewisham Plan (2009-10)</b>	This plan sets out the results of the 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.	The urban design policies in the AAP should aim to improve community safety by design. Other policies should seek to improve education, economic growth and employment levels in the borough which will reduce the drivers of crime.	The SA objectives should contain measures reducing crime and the fear of crime.
<b>Lewisham Corporate Plan</b>	The purpose of the Corporate Plan is to: <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 delivery of the SCS</li> </ul>	The AAP should have regard to the corporate priorities which are set out in the SCS and the Corporate Plan.	SA objectives should have regard to those contained in the Plan.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>Lewisham Volunteering Strategy</b>	Increase volunteering and awareness of volunteering in the borough.	The AAP may contain policies that seek to improve levels of social cohesion in the borough.	SA objectives should contain a measure to promote community identity across the borough.
<b>Ageing well in Lewisham – A well-being strategy for older people 2007-10</b>	The Strategy sets out ten outcomes that must be achieved in order to improve the lives of older people in Lewisham in line with their expectations. It contributes to the delivery of a number of priorities set out in the SCS.	The AAP should contain policies that maximises the quality of life for all residents including the borough's older residents.	The SA objectives should include measures that improve the well being and promote social inclusion of all sectors of the population including older people.
<b>Lewisham Local Cultural Strategy (2002)</b>	The aim of the strategy is to promote the cultural well being of the area.	The AAP should include a policy that seeks to promote local cultural diversity in the borough	The SA objectives should contain measures that promote the borough's cultural diversity as part of an overall promotion of a sense of community identity and welfare.
<b>Lewisham Regeneration Strategy 2008-20</b>	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy for regeneration also complements the SCS.	The AAP should contain regeneration policies that complement the borough's regeneration strategy and the SCS as part of a coherent strategic policy approach.	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.
<b>Lewisham Local Area Agreement (LAA) (2009)</b>	The LAA is an agreement with central government that establishes 35 indicators and targets which address the key inequalities that exist in Lewisham. The LAA is a key delivery mechanism of the SCS.	The AAP should broadly complement the objectives of the SCS.	SA objectives should broadly complement the achievement of the LAA indicators.
<b>Healthier Communities – A health and well-being framework for Lewisham</b>	The Strategy aims to complement the achievement of the LAA objectives and seeks to improve the health outcomes for Lewisham residents by adopting preventative measures and other innovative approaches.	The AAP should be in compliance with the objectives of the SCS. As the LAA is the key delivery mechanism for the SCS objectives, it follows that the AAP should also complement meeting the objectives of the strategy.	The SA objectives should contain a measure seeking to enhance the health levels in the borough.
<b>Lewisham Physical Activity, Sport and Leisure Strategy (2007-12)</b>	The Strategy provides a framework for activity and development in Lewisham. It has three key aims: <ul style="list-style-type: none"> <li>• increase participation in physical activity</li> </ul>	The AAP should contain policies that seek to promote active lifestyles in the borough by protecting and maintaining open spaces and	The SA objectives should contain a measure seeking to enhance the health wellbeing levels in the borough.

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	and sport <ul style="list-style-type: none"> <li>• enable the Lewisham community to develop its potential in sport</li> <li>• develop appropriate infrastructure.</li> </ul>	improving the quality of sports facilities in the borough.	
<b>Social Inclusion Strategy 2005-13</b>	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.	Social sustainability must be a key element in the AAP. Enhancing social inclusion is a key aspect of social sustainability. 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.	The SA objectives should contain measures to promote social inclusion, measured by the AAP's efforts at improving urban design, transport, education and promoting health and well-being in the borough.
<b>Local Biodiversity Action Plan – A Natural Renaissance For Lewisham</b>	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.	The AAP should aim to protect and enhance local biodiversity across the borough, including in urban areas and areas that are set for regeneration.	The SA objectives should contain a measure to protect and enhance biodiversity across the borough.
<b>Lewisham Housing Strategy 2009 - 2014</b>	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.	The AAP should be in compliance with the London Plan targets on housing and housing tenure.	SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.
<b>Brighter futures: Lewisham's Homelessness Prevention Strategy 2009-2014</b>	The Strategy complements the objectives of the Lewisham Housing Strategy. Key priorities include: <ul style="list-style-type: none"> <li>• preventing homelessness arising where possible and promoting housing options</li> <li>• providing long term and sustainable housing</li> <li>• protecting and providing support for vulnerable adults and children who are homeless or faced with homelessness</li> <li>• promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment</li> </ul>	The AAP should be in compliance with the latest London Plan targets on housing and housing tenure. The London Plan sets a high affordable housing target that should help meet the objectives of the Strategy.	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
<b>Lewisham Children and Young People's Plan 2009-2012</b>	<ul style="list-style-type: none"> <li>reducing Youth Homelessness.</li> </ul> <p>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.</p>	The AAP must include policies on education, health and well being, employment, open space and community facilities that will improve the life prospects for the borough's young people.	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.
<b>Creative Lewisham – Lewisham Cultural and Urban Development Commission</b>	The report details a vision of Lewisham as a visually exciting, creative and imaginative hub, creating a synthesis between urban design, arts, culture and the economy.	The AAP should seek to adopt best practice urban design principles that will maximise sustainability in the borough.	SA objectives as a whole should include measures that will result in a vibrant and dynamic borough.
<b>Safer Places: The planning system and crime prevention</b>	The report offers advice on planning considerations relating to crime prevention. It establishes design principles for all new development which seek to reduce crime and the risk of crime.	The AAP should include a policy promoting best practice urban design principles that among other things aim to design out crime.	The SA objectives should contain measures that seek to reduce crime and other anti-social behaviour.
<b>Draft Lewisham Municipal Waste Strategy 2004/05 – 2009/10</b>	<p>The objectives of the strategy are to:</p> <ul style="list-style-type: none"> <li>minimise Lewisham's annual growth in waste to ensure it is less than the national 3% average</li> <li>increase the amount of household waste that is recycled and composted</li> <li>ensure 100% of Lewisham's population is served by recyclable kerbside collection or bring facilities, and to provide sufficient strategically located facilities for bulky household waste. Disposal.</li> </ul>	The AAP should contain policies that promote the waste hierarchy and comply with the London Plan targets on waste minimisation.	The SA objectives should contain a measure that promotes the waste hierarchy and seeks to minimise the generation of waste.
<b>Lewisham Carbon Reduction and Climate Change Strategy 2008</b>	<p>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 to:</p> <ul style="list-style-type: none"> <li>reduce demand for energy</li> <li>increase energy efficiency</li> <li>increase the use of renewable energy</li> <li>tackle fuel poverty</li> </ul>	The AAP should contain policies that will reduce the carbon footprint in the borough.	The SA objectives should include measures that aim to reduce the borough's carbon footprint.
<b>Lewisham Local Air Quality Action</b>	The key aim is to bring about change to	The AAP should adopt policies that	The SA objectives should include a

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
<b>Plan 2008</b>	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.	promote landuses and activities with minimal impacts on air quality.	measure that seeks to improve air quality across the borough.
<b>School Organisation Plan for the London Borough of Lewisham (2004-2009)</b>	The plan sets out the Education Authority's vision for education in the borough over the period of the plan. Within this context it sets out a strategy which will guide our approach to the planning of school places.	The AAP should contain a policy that supports the enhancement of schools across the borough under the Building Schools for the Future Programme.	Sustainability objectives need to consider the adequate provision of school facilities to promote higher standards of achievement.
<b>Environment Agency State of Environment Report for Lewisham (November 2010)</b>	<b>Highlights environmental facts and data for Lewisham</b>	The AAP should take the findings of the EA State of the environment report into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
<b>COUNCIL STUDIES THAT INFLUENCE THE AAP</b>			
<b>Lewisham Strategic Flood Risk Assessment (2008)</b>	In accordance with PPS25, the study identifies and provides advice to the Council on the suitability of development in areas at varying risks of flooding across the borough.	The AAP should take the findings of the Flood Risk Assessment into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
<b>Lewisham Flood Risk and Development Sequential Test (2009)</b>	In accordance with PPS25, the aim of the sequential test is to identify potential development sites and steer 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.	The AAP should take the findings of the Flood Risk Assessment into account when developing its preferred spatial plan for the borough.	The SA objectives should contain a measure that seeks to minimise and mitigate the risk of flooding in the borough.
<b>Lewisham Local Implementation Plan (Transport) (2006)</b>	The Local Implementation Plan (LIP) is a statutory plan to implement the London Mayor's Transport Strategy. The Greater London Authority Act 1999 requires the London borough councils to each prepare a plan (a Local Implementation Plan) to	The AAP policies on transport should reflect the objectives of the LIP.	The SA objectives should contain a measure that seeks to reduce car travel and increase the use of sustainable transport modes.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	implement the Strategy within their area.		
<b>Lewisham Borough-wide Transport Assessment (2009)</b>	The objective is to produce an integrated multi-modal strategy to support the two preferred spatial growth options.	The transport policies in the AAP should take the recommendations of the transport assessment into account.	The SA objectives should include a measure that seeks to reduce car travel and improve the use of sustainable modes of transport.
<b>Deptford and New Cross Transport Infrastructure Study (2008)</b>	The study builds on a masterplan prepared for the area. It provides an understanding of the likely travel impacts of new development in the study area and gives commentary on the justification for new investment and a general approach to travel strategies.	The AAP should take the recommendations of this transport infrastructure study into account.	The SA objectives should promote the use of sustainable transport modes in new developments.
<b>Lewisham Town Centre Transport Study (2009)</b>	The study provides an understanding of the likely travel impacts of new development in the Lewisham Town Centre and gives commentary on the justification for new investment and a general approach to travel strategies.	The AAP should take the recommendations of this transport infrastructure study into account.	The SA objectives should promote the use of sustainable transport modes in new developments.
<b>Lewisham Employment Land Study (2008)</b>	This study assesses the future demand for employment land, compares it with the land supply under current planning policies and in light of the council's preferred spatial options makes policy recommendations on how far existing employment sites should be safeguarded from redevelopment for other uses.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies.	The SA objectives should include a measure that encourages and promotes the development of employment opportunities in the borough over the long term.
<b>Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA)(2009)</b>	The report is the result of 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 in the borough. This will allow the LSP and its individual partners to identify existing and future health needs of the borough and will influence the long term commissioning priorities of health infrastructure providers in the borough.	The JSNA will inform the development of the AAP spatial development policies.	The SA objectives should include a measure that seeks to improve the health and dwell-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
<b>Lewisham Leisure and Open Space Study (2009)</b>	This strategy aims to provide: <ul style="list-style-type: none"> <li>• a PPG 17 compliant review</li> <li>• a borough playing pitch strategy</li> <li>• An implementation and prioritised investment plan for the Playing Pitch Strategy.</li> </ul>	The AAP should include policies on open space to ensure: <ul style="list-style-type: none"> <li>• adequacy and quality of Open space (distribution)</li> <li>• protection of open space and biodiversity from development and enhancement where possible</li> <li>• Hierarchy of open spaces (MOL, POS, UGS).</li> </ul>	The SA objectives should include measures to protect and maintain open spaces and biodiversity across the borough.
<b>Lewisham Retail Capacity Study (2009)</b>	The Study assesses the existing and future supply and the capacity for additional retail floorspace within the borough and the role played by each of the nine Major and District Town Centres.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to retail and town centres.	The SA objectives should include a measure that seeks to attract new investment and maximise sustainable economic growth in the borough.
<b>Lewisham Strategic Housing Market Assessment (2008) and the South East London Sub-regional SHMA (2009)</b>	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.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to housing provision, mix and affordability.	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.
<b>Lewisham Infrastructure Delivery Plan (IDP) (2010)</b>	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.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the provision of infrastructure.	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.
<b>South East London Boroughs' Waste Apportionment Paper (2010)</b>	The waste paper shows how the South East London boroughs' will manage their waste apportionment as shown in The London Plan.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the management of waste and the allocation of suitable waste sites within the borough.	The SA objectives should include a measure that seeks to minimise the production of waste and ensure its effective management.
<b>Lewisham Tall Buildings Study (2010)</b>	The study identifies those areas of the borough where tall buildings may be acceptable	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP	The SA objectives should include a measure to ensure building design impacts positively on the environment

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
		policies as they relate to the location and design of tall buildings.	including historic assets.
<b>Ravensbourne River Corridor Improvement Plan (2010)</b>	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.	This study forms part of the evidence base for the AAP. The findings of the study must support the adopted AAP policies as they relate to the protection and enhancement of the Ravensbourne River Corridor and the activities along its length.	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 and access to leisure services.

APPENDIX 4: Consultation results

The following table provides a detailed summary of points raised by stakeholders in recent consultation with respect to Lewisham Town Centre. The majority of consultation recorded relates to the programme of engagement which was undertaken during the preparation of the Lewisham Town Centre Development Strategy.

<b>ISSUES RAISED</b>
<b>Consultation from Urban Renaissance in Lewisham project (undertaken in 2002 by Todd Strehlow)</b>
<p>Views on range of options for Lewisham Gateway scheme and TC as a whole. Summarised as follows:</p> <ul style="list-style-type: none"> <li>• There is very strong support overall for the principle of the 'Low H' option for redevelopment, with the notable exception of the business community. There is a minority view among residents that the roundabout should be retained.</li> <li>• In addition to their views on the options, the public expressed views on a wide range of other topics. The four main ones, which emerged time and again across all consultation formats, were: <ul style="list-style-type: none"> <li>– Widespread dissatisfaction with the roundabout - whether from a pedestrians', or cyclists', or motorists' point of view. Most people wish to see the roundabout removed or very substantially altered.</li> <li>– Dissatisfaction with the current retail offer in the town centre - both its range and quality. Many spoke of the proliferation of sports and discount shops, and lament the lack of a department store.</li> <li>– There is very strong interest in seeing a wider range of improvements to the town centre, particularly to the quality of the environment of the High Street (in terms of management, maintenance and traffic) and the range of activities and facilities found there.</li> <li>– Environmental factors rank the highest on a range of concerns about the town centre as a whole and future development.</li> </ul> </li> <li>• Many residents would like the quantity of public open space in the town centre to be maximised.</li> <li>• Widespread view that the centre is simply unattractive.</li> </ul> <p>Further information available.</p>
<b>Steering group meetings (Lewisham Town Centre Development Strategy)</b>
Review of output and project steer
<b>Lewisham Town Centre Walking Audit Event</b>
<p>The consultation event centred around a walking audit of Lewisham Town Centre, where participants were asked to identify the key problems in the area and dreams for the future. Following the walking audit, workshops were held to identify solutions that would enable the problems to be addressed and the dreams to be realised.</p> <p>A number of priorities were identified at this event, including:</p>

## ISSUES RAISED

- Far greater access should be provided to the rivers within Lewisham;
- Trees and green spaces should be promoted throughout the town centre;
- Frontages should be improved, particularly in Ladywell and facing onto the sculpture park;
- Existing landmark features should be improved and upgraded;
- Signage should be upgraded and improved throughout the town centre;
- Lewisham Gateway features should be established;
- A brand or corporate identity should be developed for Lewisham which is used in all street furniture;
- Upgraded public highways with more activity and vibrancy;
- Pedestrian linkages across busy public highways should be improved;
- General improvements to the pedestrian environment throughout the town centre;
- Provision of sports and leisure facilities for all cultures and ages;
- The market represents a key opportunity for enhancement.
- The introduction of more cafés, restaurants and leisure facilities within the town centre; and
- A better choice of shops including more department stores.

See Consultation report for further details.

Spreadsheets also available for:

- exact contents of post-it note exercise for Dreams workshop; and
- all people who were formally invited to attend.

## Lewisham Information Day

Representatives of the consultant team attended Lewisham Information Day from 10am to 6pm on Friday 26 March. A number of different exhibitors displayed information at the event which took place in a marquee adjacent to the street market on the High Street. A small display was produced which summarised the aims, objectives and opportunities for Lewisham Town Centre Development Strategy. Accompanying the exhibition was a short questionnaire seeking to find out peoples views regarding potential themes for development. Members of the consultant team and Council officers were available to discuss the project with people throughout the event.

Feedback at the event was extremely positive, with a strong sense of commitment to the town centre and the potential to make improvements. The exhibition and questionnaire were also posted on the project website ([www.lewishamtowncentre.co.uk](http://www.lewishamtowncentre.co.uk)).

## ISSUES RAISED

48 people completed and submitted questionnaires which have subsequently been analysed and fed into ongoing wider consultation.

The main focus of the questionnaire was to establish the level of priority which people attached to various thematic development opportunities. These priority areas were:

- Environment;
- Economy;
- Transport; and
- Residential and community.

Respondents were asked to select a number from 1 to 4 depending on how important they considered the development opportunity to be (1= Not important; 2= Don't mind; 3= Quite Important; 4 = Extremely important).

Analysis of the questionnaires demonstrates that participants consider that Lewisham town centre would benefit from all potential development themes attaching varying degrees of importance to these. In order to rank the development themes, each theme has been given a score depending on the number of people who considered it to be 'Not important', 'Don't mind', 'Quite important' or 'Very important'. The table below uses a points system to rank themes in order of priority.

Rank	Category	Theme	Score
1=	Improve community safety	Residential & Community	100
1=	Improvements to the High Street environment	<i>Environment</i>	100
3	Improve the pedestrian environment	<i>Transport</i>	90
4	Create new green spaces	<i>Environment</i>	87
5	Improve access for elderly and disabled people in the town centre	<i>Residential &amp; Community</i>	86
6	Improve Lewisham's shopping	<i>Economy</i>	83
7	Provide new facilities for young people	<i>Residential &amp; Community</i>	73

**ISSUES RAISED**

8	Provide new community facilities	<i>Residential &amp; Community</i>	71
9	Provide better links across the town centre	<i>Transport</i>	70
10	Improve the road network around the town centre	<i>Transport</i>	69
11=	Create more places to sit and relax	<i>Environment</i>	65
11=	Provide more leisure opportunities	<i>Economy</i>	65
12	Develop a vibrant evening economy	<i>Economy</i>	62
13	Enhance Lewisham's Rivers as a focus for the town	<i>Environment</i>	60
14	Improve the cycle network	<i>Transport</i>	54
15	Create new high quality residential neighbourhoods	<i>Residential &amp; Community</i>	48
16	Provide more space for small businesses	<i>Economy</i>	47

For further detail see consultation report.

Spreadsheets available showing full questionnaire responses (questionnaires anonymous)

**Letters to landowners**

Responses resulting in meetings are listed below:

**Stakeholder meetings (Lewisham Town Centre Development Strategy)**

As part of the consultation process, a number of meetings were undertaken with stakeholders. A number of issues were raised which are summarised below:

Lewisham Gateway development

- Development strategy will help to integrate areas which fall outside the sphere of the Urban Renaissance in Lewisham initiative

Development potential

- Feedback from landowners conveyed a sense of optimism for the town centre
- Debenhams viewed as a trigger for higher quality retail

## ISSUES RAISED

- Cinema and high quality fashion outlets would be welcomed
- Opportunity at southern end of High Street around Molesworth Street junction
- Commercial opportunities relating to proximity to Canary Wharf
- Ladywell is an asset and 'Ladywell Village' provides an opportunity to encourage development of niche uses and the restoration of historic properties in the area.

### Design and scale

- High density but sufficient outdoor space
- Encourage people to linger, not pass through
- Link between Lewisham Gateway and High Street is critical
- Open up rivers
- Emphasis on sustainability including mix of uses on sites (retail and residential)
- Residential development is a vital component for the Town Centre

### Lewisham's rivers

- consideration of flooding as a constraint
- restoration of rivers
- opening up rivers, increasing pedestrian access
- naturalisation works in appropriate locations

### The Lewisham Centre

- Shopping centre performing well
- Leisure Box facility on upper floors is a development opportunity
- Presence of Shopmobility should be retained

### Evening Economy

- More diverse evening economy with cafes, bars and restaurants

### High Street, shopping and market

- Shops and street markets are priorities, and vibrancy and range should be protected and enhanced
- More strategic vision for market with a coordinated approach to services (see table below)
- Better demarcation between pedestrian and vehicle space

### Transport

- Good links are an asset
- Poor pedestrian environment with opportunities for better walking and cycle links
- Waterlink Way and improved access to rivers present an opportunity

### Community issues

- Affordable and accessible facilities for young people are crucial
- SRB funding for a 'community asset' is available

### Green space

## ISSUES RAISED

- Green space is lacking and it is important to create more formal open space and green elements within individual developments

Council officer led briefing on key town centre sites in brief in addition to brief.

- Informed Cllr Moore of LTCDS context including consultation
- Confirmed importance of consulting with SRB board members and board as a whole
- Informed consultant team of political sensitivities of certain sites and issues (e.g. leisure centre provision, schools provision, market)

Council feedback on priorities Transport

Various options/issues for Town Centre:

- Management scheme for Lewisham High Street and Lewis Grove;
- Congestion is a problem;
- Pedestrian safety issues;
- Reduce bus traffic congestion in High Street;
- H junction and re-configured roundabout through interchange redevelopment
- Review Sundial roundabout

Discussion about potential for expansion in new or existing site(s) in Lewisham Town Centre and other parts of the borough.

## Context

Emphasis on Thames Gateway context

### Lewisham Gateway site

Should interact with appointed Lewisham Gateway team. It is the right approach not to be constrained by the indicative urban design of the Lewisham Gateway.

Key issue is how to get from station/DLR to the High Street. Potential for bridge or underpass.

### Other key issues

Sustainable living policy determines a wider definition of the town centre.

Town centre has high PTAL and there is potential to intensify public and private residential areas.

## ISSUES RAISED

It was agreed that the identification of potential sites for intense uses is a positive step at this stage of the project.

Encourage an active frontage on Molesworth Street

- Current baseline position in centre (e.g. rents)
- Car parking capacity, potential to increase
- High Street units are in individual freehold
- Support the market and any improvements
- Potential for active frontage on Molesworth Street limited by practicalities of servicing/storage arrangements in current unit configurations
- Potential for redevelopment of leisure box
- Traffic, potential to improve access to centre car park
- Support improvements to evening economy
- Discussion about aspirations for Shopping Centre (which is now in new ownership)

- Important to consider LTC beyond the Lewisham Gateway
- Potential for radical alterations to road and rail network
- Animate Molesworth Street (more active frontage, or not possible, more active entrance/exit points)

- Three assets / good things / selling points of the town centre
  - ✓ Street market – popular, vibrant, nice mix of products, gives town centre a buzz
  - ✓ Retail mix is popular with locals, vibrant
  - ✓ Public transport links
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Street market! – Needs more strategic vision, creates mess & refuse, needs upgrading, signage, needs traffic order to stop improper parking, sort out compactor
  - ✓ Lighting – especially in market area, forms part of perception of the town centre in evening as an unsafe place; wasted opportunity
  - ✓ High Street – traffic management especially, clogged up with buses and cars; may always be conflict but current plans are a step forward progress
- Three top priorities for the town centre?
  - ✓ Continued investment

## ISSUES RAISED

- ✓ Raise profile of town centre; change perception among punters
- ✓ Sort transport problems, especially for pedestrians
  
- Lewisham town centre in 10-15 years
  - ✓ Hopes that overall objectives of SRB will have been achieved
  - ✓ Market still here and upgraded
  - ✓ Still recognisable but greatly improved
  - ✓ Need a 'closure' of the vision – implemented, practical, attention to detail, "finished and signed off"
  
- Views development sites
  - ✓ Cinema!
  - ✓ Improved access for disabled people, hope to achieve this on back of Lewisham Gateway scheme
  - ✓ Via town centre management and section 106 – new entities to address strategy and community concerns
  - ✓ Sites for more upmarket fashion
  - ✓ Sites for business incubation, start-up offices – there are hardly any now, especially needed for ethnic minority businesses
  - ✓ Model Market is neglected – hopes will stay but be upgraded; perception that it's not safe (not the reality)
  - ✓ Would be a shame if the southern end of shopping centre (& Model Market) was just demolished and replaced with a big new scheme
  
- Views on scale of development
  - ✓ Generally OK with scale of Lewisham Gateway and similar schemes
  
- Specific hopes for the Urban Design Framework
  - ✓ Pleased that it's being done
  - ✓ Helps to tie in areas that aren't the central focus of Urban Renaissance / SRB
  - ✓ Good timing
  - ✓ Need a co-ordinated approach to the area, look at issues that can't be dealt with by Urban Renaissance – especially the south end of the town centre, Lee High Road businesses, and those who suffered through Lewisham 2000
  
- Other ideas and issues
  - ✓ Market – what it needs: sort traffic order, new stalls, new canopy(ies), lighting, signage, sort refuse

Site potential for Thurston Road, and general discussion regarding LTC

General progress overview by UP.

Noted that many board members would be consulted on a one-to-one basis (see other stakeholders)

## ISSUES RAISED

- Three assets / good things / selling points of the town centre
  - ✓ Rivers – chance to enhance the environment
  - ✓ Lots of people coming into the area, passing through – but we're not taking advantage of them
  - ✓ Market – though needs a 'bit of a lift'
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Car parking – sheer lack of it; concern at new facilities not having enough or any (e.g., new police station)
  - ✓ Rivers – challenge of flooding
  - ✓ Lack of department store
  - ✓ Quality of shops not up to scratch
- Three top priorities for the town centre?
  - ✓ Leisure centre & sport – something for young people (queries what facilities Lewisham College would have?)
  - ✓ Department store – hopefully Debenhams will come
  - ✓ Evening economy – likes Fulham Broadway triangle development (multiplex, restaurants)
  - ✓ Budget hotel – maybe e.g., Holiday Inn Express
- Lewisham town centre in 10-15 years
  - ✓ Lots of enthusiasm – 'A Number 1 Town – competing with the best' like the West End, Bluewater, Bromley, Lakeside. Debenhams is essential to start this off, lead to a better class of shop.
  - ✓ South end of shopping centre needs something but we also need to retain some specialty outlets (both there and throughout the centre).
  - ✓ Does not want a town that's the same as everywhere else. Need an individual personality, but not certain how to achieve this.
- Views development sites
  - ✓ No comment.
- Views on scale of development
  - ✓ Generally OK with the scale of development proposed, for example on the Lewisham Gateway site.
- Specific hopes for the Urban Design Framework
  - ✓ Put Lewisham back on track to be what it was 30 years ago.
- Other ideas and issues
  - ✓ A model would help people to visualise how X, Y, Z is going to happen.

## ISSUES RAISED

- Three assets / good things / selling points of the town centre
  - ✓ Market
  - ✓ Rivers – one occasionally sees them, but then not sure where they go
  - ✓ Waterlink Way
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Pedestrian routes poor, busy streets to cross
  - ✓ River – currently just a drainage channel, not much to look at – opportunity to break down walls such as at Quaggy Gardens
- Three top priorities for the town centre?
  - ✓ Improve appearance of rivers
  - ✓ Real opportunity in Lewisham Gateway site to open up rivers
  - ✓ Improve / manage flood risk
- Lewisham town centre in 10-15 years
  - ✓ Thriving, attractive centre
  - ✓ Not just a place to get in and out and leave quickly, but enjoy and linger
  - ✓ Clearer to navigate and cross roads and railways
- Views development sites
  - ✓ Ladywell – low scale development in keeping with Victorian context
- Views on scale of development
  - ✓ No comment.
- Specific hopes for the Urban Design Framework
  - ✓ Establish key principles
  - ✓ Highlight importance of rivers
  - ✓ Clear commitment to the riverside treatments
  - ✓ Aspiration to improve the rivers
  - ✓ Pedestrian routes along the rivers
  - ✓ Manage flood risk
  - ✓ Rivers not an afterthought, but made the most of from the start

## ISSUES RAISED

- Other ideas and issues
  - ✓ Natural river bank would be ideal, but open to ideas
  - ✓ Possibility of a 2-stage channel with various uses – perhaps including footpaths which might flood at high water levels
  - ✓ EA has been happy with the process so far; they've been involved and consulted
  - ✓ Need access along the rivers for maintenance – 8 metres either side is the standard to aspire to – this zone should be free of permanent solid obstructions; public access is acceptable within the 8 metre zone
  - ✓ Lidl, Lee High Rd – seeking naturalisation works and a decrease in overshadowing, negotiations seem to be going OK
  - ✓ Seek break out of Quaggy at police station, or at least some surface features to show that it is there
  - ✓ Have been major works nearby, e.g., Sutcliffe Park, also studies of Lee High Road
  - ✓ EA seeks opportunities as development comes along
  - ✓ Is the duty of riparian owners to maintain flood defence and not block the flow; EA inspects, can give grant in very exceptional cases
  - ✓ EA's recreational duty – access along rivers, seeking new routes; most EA funding is just for flood defence works, but work successfully in partnership
- Three assets / good things / selling points of the town centre
  - ✓ Market – potential for improvement, e.g., cover, diversify goods on sale... a good base to build upon
  - ✓ Good public transport routes and connections
  - ✓ Diverse population – some interesting shops, potential for more
  - ✓ Tesco as an anchor, also provides parking
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Car access and parking is very limited, but addressing this may clash with residents' needs
  - ✓ Aesthetics – the area looks a mess, a mix of styles, lack of green space
  - ✓ Quality of shopping offer – they come because it's cheap, not due to quality or bulk
  - ✓ Wasteland between interchange and shopping areas – Lewisham Gateway scheme should address this
- Three top priorities for the town centre?
  - ✓ Link Lewisham Gateway to shopping area, plus anything to make area more pleasant, green; open rivers up; art
  - ✓ Improve quality of shopping offer – more upmarket, more diverse – provide more reason to linger, including cafes and restaurants; more 'continental'
  - ✓ More people living in the area, esp. families, but they need to feel safe; need to counter yob culture
- Lewisham town centre in 10-15 years
  - ✓ More vibrant centre, niche shops, more places to linger and socialise, interaction between communities
  - ✓ Focus on making Lewisham an attractive residential area – don't put all our eggs in the retail basket as trends may change
  - ✓ More green
  - ✓ First class architecture – something to come and look at – so that 'the anonymous centre becomes remarkable'

## ISSUES RAISED

- ✓ Less reliant on cars, pedestrian friendly, good balance with public transport
  - Views development sites
    - ✓ Model Market – improve access and visibility; ‘agnostic’ on whether to improve what’s there or redevelop
    - ✓ Ladywell Baths – would like leisure centre to survive in place, is a better location for many residents; any new centre must be affordable and easy to get to
    - ✓ Ladywell Village – there has been some opposition to a new secondary school in Ladywell; potential for niche restaurants and bars; village feeling; build on strengths
  - Views on scale of development
    - ✓ Should be of a human scale, not like the police station or shopping centre
    - ✓ The most interesting places have evolved organically
    - ✓ Should be sustainable by being underpinned by residential development, not just retail-led; must be convenient and walkable and facilitate local interaction
    - ✓ For a ‘continental’ centre one must accept high density
  - Specific hopes for the Urban Design Framework
    - ✓ Nothing specific
  - Other ideas and issues
    - ✓ Noted that the Walkabout attendees were not representative of the ethnic mix of the area
    - ✓ Noted that in the recent campaign, bus overcrowding and unreliability were big issues. Education did not feature much in the campaign, as might have been expected.
    - ✓ High Street – high accident rate; fears currently proposed scheme may not deal with the volume of traffic, will need to monitor; high concentration of bus traffic there, and Lewisham generally
- Discussion relating to potential for Gilmex site at Conington Road and wider LTC.
- Possibility that existing uses will relocate
- Potential for residential-led mix (to complement adjacent Venson site)
- Noted that Tesco are also considering options for their adjacent site

## ISSUES RAISED

- Discussion relating to Bridgehouse Trust owned land in LTC (Model Market and units on Engate Street)
- Potential for 'southern gateway' development, to create a balance to the interchange development
- Complex leaseholder scenarios

- Three assets / good things / selling points of the town centre
  - ✓ Easily accessible by transport
  - ✓ 'Has most shops I want'
  - ✓ Good market
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Without things for young people, they will get frustrated and anti-social behaviour could result. Currently no venue to meet, and just two outreach workers. There will be more young people hanging about in any event, with the new Lewisham College campus. Facilities must be affordable for young people. Plans she's seen so far may be missing these elements; fear of not including them.
  - ✓ Shops take space on pavement, hinder access, possible threat to market
- Three top priorities for the town centre?
  - ✓ Develop a community asset, with £600k set aside
  - ✓ Things for young people
  - ✓ Bring in people through consultation
- Lewisham town centre in 10-15 years
  - ✓ 'Will be fabulous and attractive!'
  - ✓ Will be tidied up, stations improved, pedestrianised area, better shops; there is hope for the town centre
- Views development sites
  - ✓ Some existing businesses will lose out, by not being able to compete with things in the new developments
- Views on scale of development
  - ✓ Concern about whether we might be building the ghettos of the future – outlook good for 10-15 years, less sure about 30 years; not enough family accommodation
- Specific hopes for the Urban Design Framework

## ISSUES RAISED

✓ That it take on board the views aired at the Walking Audit and elsewhere

- Other ideas and issues

- ✓ Thought we could do some extra mini-walking tours/audits as part of the consultation, covering different parts of the centre of different groups; otherwise happy with consultation process for the study, does not see need for other additional work
- ✓ Regularly gets 25+ people for her 'Lunch, Munch and Listen' sessions for over 55's
- ✓ Will start 'Early Evening Express' sessions also, aimed at commuters / those who are busy during the day
- ✓ Malcolm Exon new URL board member (United Reformed Church)
- ✓ Circle 33 manage the central Lewisham council housing stock
- ✓ Wardens are pivotal in the town centre – on site every day, they need to be well informed and up-to-date (Eden Geddes, head of town centre team)
- ✓ Concern about future of Shopmobility – people need to be able to get around; Shopmobility has many users who bring in the £; only scheme in London which provides a helper to go around with you; they currently have a good deal from Slough – rent free plus maintenance
- ✓ Liked the Walking Audit very much; was interested to see how close the views were between a wide range of interests
- ✓ Newsletter to 8,500 going out 10 June

- Potential for 'Community Asset' to be located in town centre through SRB funding (budget £600K). Possible locations include:

- The Lee Moor Centre (Clarendon Rise);
- Top of the library;
- Sundermead park (SRB);
- New central development; or
- Riverdale building on Molesworth Street.

Peter Head, a member of the London Sustainable Development Commission facilitated a Sustainability Workshop in Lewisham on Tuesday 25 May. This session was attended by a range of Council officers and other representatives, and provided an introduction to the Framework, and demonstrated how it can be used to inform joined-up creative thinking. This was undertaken using the Framework's four principles of sustainable development to guide the workshop.

The results of the brainstorming session are summarised with respect to each of these principles below:

### **Taking responsibility**

*"Sustainable Development depends on everyone taking responsibility for their own actions, and being aware of the impact of those actions on other people and the environment."*

## **ISSUES RAISED**

Consideration of the potential impact of proposals, the identification and participation of stakeholders in the planning process, long-term thinking, and a sense of ownership are essential components of sustainability. Attendees at the workshop considered that a comprehensive consultation process would engender a strong sense of ownership amongst a wide range of stakeholders, and it was recognised that consultation was a central component of the project programme.

There is also an emphasis on creating a sense of ownership of the Development Strategy across a wide range of departments in Lewisham Council, giving the document greater weight at a strategic and practical level.

### **Developing Respect**

Developing respect relates to recognising diversity, and responding to the needs and aspirations of the community. The Sustainability Framework supports the creation of vibrant communities which are safe and defined by a strong sense of participation at a local level.

The Lewisham Town Centre Development Strategy has placed an emphasis on understanding the local community with an extensive programme of consultation, and socio-economic research. It was acknowledged that the borough's diversity has engendered a culture of tolerance and acceptance and that this should be celebrated.

It was noted that the Development Strategy should respect scale and character, with Ladywell and Lee High Road being prime examples of areas in the town centre with strong identities which should be enhanced by new development. The market was also identified as a major destination in the town centre, and an important cultural feature as well as an economic one.

### **Managing Resources**

Managing resources reflects the environmental and physical aspects of sustainability, particularly with respect to biodiversity, open spaces and the built environment. This theme also describes the prudent, efficient and effective use, recycling and disposal of resources.

It was noted that aspirations for new residential communities in the town centre would contribute to a sustainable use of resources in the Town Centre, which is defined as a Sustainable Living Area (SLA). SLAs are zones where high density residential development is encouraged within walking distance of local facilities and public transport connections. SLAs can contribute to a reduction in demand for travel. Another aspect of the sustainable management of resources is the provision of high quality spaces, working with natural areas such as rivers. The Development Strategy will seek to provide such spaces through consultation and an in-depth urban design analysis.

### **Getting Results**

Getting results emphasises the importance of achieving progress across a wide range of objectives including social, economic and environmental issues; delivering innovation; and providing access to services, facilities, housing, green space, good quality food, and cultural and leisure activities.

## ISSUES RAISED

It was noted that the Development Strategy would be instrumental in this respect, providing a context for joined-up strategic thinking. The consultation process has established a dialogue with some key landowners, and developing effective partnerships with the private sector will be central to the delivery of key proposals within the strategy. The strategy will also provide the Council with a tool to achieve a desirable and sustainable mix of uses and improvements in Lewisham, and a mechanism for maximising planning contributions through s.106 agreements. The document will define a context for new houses, jobs, services, open spaces, leisure facilities and new development and will set a context for new development to be delivered to the highest possible quality.

The strategy will make links to other existing initiatives, situating them in a broader town centre context and thereby providing additional support.

- Lewisham market is one of very few six-day a week markets in the UK
- Safety on the High Street is a major priority for traders, who are aware of high incidence of accidents involving pedestrians. They believe that this is caused in part by unclear demarcation between pedestrian and vehicle space, and by buses traveling at speed down the High Street
- The traders are keen to see some investment in stalls in the market, and would welcome the extension of the shopfront grant scheme to cover market stalls
- There are issues associated with infrastructure in the market – the water and electricity supply and lighting arrangements were all put in as temporary measures and are in need of replacement and upgrading
- The traders expressed concern at the shortage of parking facilities in the town centre, both for traders and members of the public. There is concern that the Lewisham Gateway and Debenhams developments will exacerbate this issue, as some parking will be lost, and congestion will worsen.
- Safety is the key issue in determining how well used car parks are in the town centre. It was acknowledged that the Riverdale Centre car park has been refurbished and improved, but it was thought that this should be better promoted, as some customers perhaps still associate this car park with the poor reputation it had prior to refurbishment and are therefore reluctant to use it.
- The traders expressed opposition to any potential proposal to alter the layout of the market, indicating that the existing layout is thought to work well, and that there would be concern about some traders having to move to less prime pitches, and a new layout discouraging customers from walking the full length of the market.
- The traders would like to see a permanent canopy in the market to protect customers from inclement weather and provide a more modern shopping environment. It was noted that a canopy had been designed as part of the Lewisham 2000 scheme, but that funding had not been secured.
- The traders would welcome investment in the stalls to provide a consistent appearance throughout the market
- The traders welcomed the recent introduction of pay and display parking in some areas of the town centre
- The current location of the compactor was discussed, and it was agreed that it is not necessary for it to occupy such a high profile location in the town centre.
- The traders would welcome further facilities to encourage recycling in Lewisham market, and suggested that with the introduction of such facilities it could be branded as 'the most recyclable market in London', providing positive publicity and reducing the need for the compactor.
- The issue of the poor visual appearance presented by the backs of stalls was discussed. The traders thought that this could be improved by the introduction of purpose-built storage units, which would also reduce the number of vehicular trips into the market which are generated by traders replenishing their stock throughout the day.

- Service parking arrangements

## ISSUES RAISED

- Views of stall backs and compactor
- Toilet provision
- Canopy for market
- Power facilities
- Potential to consider market layout

- Three assets / good things / selling points of the town centre
  - ✓ Natural assets & geography; rivers
  - ✓ Transport links
  - ✓ People – mixed and friendly, makes for an interesting, safe and enjoyable place
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Pedestrian area doesn't work – mix of buses and people space; ill defined; unsafe
  - ✓ No department store
  - ✓ Rivers look like drains, detract from the urban landscape in their current form
- Three top priorities for the town centre?
  - ✓ Restore rivers, bring back to life, can be attractive and make Lewisham unique
  - ✓ Smarten up area – it's untidy and unkempt, such as its paving, bins, posts
  - ✓ More open space where people can sit out and feel comfortable
- Lewisham town centre in 10-15 years
  - ✓ Desirable place to live (already is!) – and also perceived to be
  - ✓ Desirable place to work and shop
- Views development sites
  - ✓ Lewisham has a vibrant voluntary sector – would like them to have a visible presence in the commercial area (not just hidden around the back, etc). This could be a central premises with space for groups, offering services, provided right where people are going, centrally located; people should know of their existence and importance
  - ✓ Cinema, swimming pool – would like a mixed development but not sure of location for these facilities
- Views on scale of development
  - ✓ Strong gut feeling against tall buildings / going too high. Feels strongly that one reason Lewisham feels safe is its lack of tall buildings. They might affect people's feelings, actions.

## ISSUES RAISED

- ✓ Not opposed to high density but there needs to be good outdoor space that people can feel comfortable in
  - ✓ Danger of destroying the place if we go too high or too dense; be careful not to destroy our natural advantages
  
  - Specific hopes for the Urban Design Framework
    - ✓ It is really, really important to involve the people who live, work and shop here – only by understanding them will the plans work
    - ✓ Hopes developers see the commercial advantage in creating attractive space
  
  - Other ideas and issues
    - ✓ Draconian slowing of traffic on main roads – thinks traffic might flow better anyway and would help the feel of the place
    - ✓ Combine the rivers with footpaths – have low level footpaths near the water so people can get down there; would be accessible most of the time and be available for flood catchment when needed
- 
- Three assets / good things / selling points of the town centre
    - ✓ Market – been there a long time, a big asset
    - ✓ High Street – very good at moment, could be much better
    - ✓ CCTV cameras – people are not as afraid to go out
    - ✓ Wardens
    - ✓ No-drink zone
    - ✓ Community projects – nice to see things happening; already good sense of this, has improved in the last five years – “long way to go, but people are talking about how good it is to be in Lewisham”
  
  - Three greatest liabilities / problems / shortcomings of the town centre
    - ✓ High Street traffic – lots of elderly trying to cross; vans blocking access; needs to be sorted; need to have clear rules laid down and stick to them
    - ✓ Shops goods on pavement
    - ✓ “Not a great deal wrong with Lewisham”
  
  - Three top priorities for the town centre?
    - ✓ Something for young people, esp. Monday to Friday afternoons when they come out of school; something to amuse, divert, keep out of mischief; can be intimidating for older people
  
  - Lewisham town centre in 10-15 years
    - ✓ Will be vastly improved
    - ✓ Nice place to live (is now, will remain so)
    - ✓ Should always look to make improvements, not be stagnant
    - ✓ Look for better bars, culture – keep people in Lewisham

## ISSUES RAISED

- Views development sites
  - ✓ No specific comment
- Views on scale of development
  - ✓ OK with what he's seen of the Lewisham Gateway proposals – “not obnoxious looking”
- Specific hopes for the Urban Design Framework
  - ✓ To make Lewisham a better place
  - ✓ Hope to maintain standard / pace of improvement
- Other ideas and issues
  - ✓ Hope developers have a long forward outlook
  - ✓ Lewisham 2000 did not make much impact
  - ✓ Good to get people interested – always seem to keep getting harder to do this; thinks Carole Long does a very good job
  - ✓ Make sure smaller businesses don't go out of business because of the big new ones – they've kept Lewisham going all these years; think of the small people
  - ✓ Surprised young people don't go into the Leisure Centre more
  - ✓ Diversity of culture in the area is “fabulous”
- Three assets / good things / selling points of the town centre
  - ✓ Easily accessible, especially by bus and rail – less so on foot
  - ✓ Market is “a plus” – a great add-on to the centre
  - ✓ Pedestrianised area – can put on events
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Roundabout – “awful thing”
  - ✓ Known as “Pound shop city” – lack of really good shops, poor compared to Bromley, let alone others
  - ✓ Bus / pedestrian conflict in High Street – in an ideal world would be completely pedestrianised
- Three top priorities for the town centre?
  - ✓ Must be seen as “fashionable and classy”. Other places have changed in the last 20 years – why not Lewisham? Don't want it to be seen as downmarket. Should be a place to come for shopping, cinema, eating out, leisure... Need to increase loyalty of existing catchment.
  - ✓ Needs a mix of uses to keep it open – it's dead at night

## ISSUES RAISED

- ✓ Should be no barrier between interchange and town centre
- ✓ Green space, open up rivers, make environmentally pleasant
  
- Lewisham town centre in 10-15 years
  - ✓ Back to level of 'metropolitan centre', we should try to get there
  - ✓ Need leisure, restaurant, cinema – all the aspirations articulated in the SRB bid
  - ✓ The Lewisham Gateway scheme finished, sorted
  - ✓ If we get the current projects right, they should last for 20, 30 years or longer
  
- Views development sites
  - ✓ Don't want to lose Tesco or other major retail
  - ✓ Big winners will be those who get into the Lewisham Gateway scheme
  - ✓ No firm views on where certain uses should go
  - ✓ Wants affordable housing included
  
- Views on scale of development
  - ✓ If high rise is sought after, there should not be a problem; all about balance
  - ✓ Scale of Lewisham Gateway looks good
  - ✓ May be some trade off between green open space and development
  - ✓ Don't want concrete jungle but must accept that developers need to make money
  - ✓ All depends on the design – this is the tricky bit!
  
- Specific hopes for the Urban Design Framework
  - ✓ Want to encourage people and businesses in
  - ✓ Realistic and sustainable
  - ✓ Something to hope for
  - ✓ Must get it right, and not decide later that we want to pull it down!
  
- Other ideas and issues
  - ✓ Covered above
  
- Three assets / good things / selling points of the town centre
  - ✓ Market
  - ✓ Interchange / transport links

## ISSUES RAISED

- ✓ DLR in particular
- Three greatest liabilities / problems / shortcomings of the town centre
  - ✓ Traffic volume – makes very pedestrian unfriendly. Biggest problem is the sheer fact of the A20 and A21 meeting here.
  - ✓ Lack of high-profile retail – it's "not the most sophisticated town centre"
  - ✓ No leisure amenities / facilities
- Three top priorities for the town centre?
  - ✓ Improve rivers
  - ✓ Improve pedestrian access
  - ✓ Improve standard of design – it's "all horrible". Need urban design / development which is appropriate to Lewisham and not just "ego driven". All about "liveability and workability".
  - ✓ Make Lewisham a satellite of Canary Wharf, in terms of offices and services (as had been envisaged years ago). Town centre should not just be retail-based, but be a major place of employment
- Lewisham town centre in 10-15 years
  - ✓ Hope it's a place where people want to be, live
  - ✓ Should be one of the top desirable boroughs in the South East
  - ✓ A place where people want to go, a hub of activity
  - ✓ Location for business and industry
- Views development sites
  - ✓ No specific views on the role of individual sites
  - ✓ All down to economics but we must respond positively when applications come in
- Views on scale of development
  - ✓ Development is bound to be dense, but will the quality be good enough
  - ✓ Might be better to lose some floorspace if we could create a better environment
  - ✓ Smaller scale in some cases could actually be more valuable
- Specific hopes for the Urban Design Framework
  - ✓ Would like to see green roofs feature
  - ✓ Address nature conservation and wider sustainability issues
  - ✓ Enhance public amenity
  - ✓ Flood amelioration
  - ✓ Interconnection of green space – a 'green grid'. Can each development add something positive to the green grid?

## ISSUES RAISED

✓ Series of pocket parks

- Other ideas and issues

- ✓ Would be great to deck over the roads, “just get rid of them”
- ✓ Roofs of various heights – some could allow public access
- ✓ Make it “one of the most sustainable town centres in London”
- ✓ Green space should be part of any planning application
- ✓ Access from station area towards Greenwich and estates north of the station important too
- ✓ Roof spaces need to be activated – this is in the SPG but is “tame” and could go further
- ✓ Consider the Swedish ‘green area factor’ model as means of judging sustainability of development proposals

Meeting between LTCDS consultant team and representatives of MFI, Allied Carpets and Workspace Group discussing potential for Loampit Vale area.

### Comments from [www.lewishamtowncentre.co.uk](http://www.lewishamtowncentre.co.uk)

Several comments have been received to date on the Development Strategy’s project website. A key concern was consideration of ‘green’ transport links such as cycling and walking. One stakeholder was supportive of the expansion of the existing bus stand area and redevelopment into a proper bus station, or redevelopment for new uses such as retail and offices.

The existing retail offer is perceived to be unsatisfactory due to a lack of specialist and higher order comparison goods. Certain retail units in the High Street are also perceived to be scruffy and untidy, and refuse collection was identified as an issue. An aspiration was expressed for the town centre to compete with nearby developments such as Canary Wharf, with a greater choice of quality clothing, footwear, eatery and independent retailers to attract money and consumers, and make the town a more vibrant place to live and work.

One comment praised the new civic space in the Lewisham Gateway development but expressed concern that this area would be aesthetic rather than functional. A continental mix of open air dining, drinking and art/craft stalls would assist in the creation of a more vibrant and active space which would attract local residents and visitors alike..

Full list of e-mails available.

### Lewisham Town Centre Area Action Plan

#### (a) Sustainability

## ISSUES RAISED

- Sustainability appraisal for the Core Strategy and AAP should be consistent
- AAP may have a more specific expression of generic objectives. A consistent framework is important as it will enable resources and information to be shared at the monitoring stage.
- sustainability appraisals will be useful as a tool for proposals and options.
- about 25 objectives
- Where possible the Sustainability Appraisal and evidence base should draw on baseline information from a range of sources such as the Health Impact Assessment for the Lewisham Gateway.

### **(b) AAP boundary**

- LTC AAP provides an opportunity to review the boundary which is currently defined within the adopted UDP.
- various options for this including retention of the existing boundary, or a tighter border relating to the core retail area.
- key purpose of the AAP is to provide a framework for resolving development pressure.
- The Development Strategy demonstrated the possibilities and commercial interest in the town centre's peripheral sites including Lee High Road, Ladywell, and Loampit Vale, especially in relation to the potential for the Lewisham Gateway development to cause a shift in gravity away from the existing retail core.
- The boundary should also include Waterlink Way which is an important aspiration for the town centre.

### **(c) Lewisham Gateway**

- Planning policy relating to the Lewisham Gateway site is set out in the Lewisham Gateway Planning Brief SPG. The Council has appointed a development partner to work on the project and the scheme is being taken forward over the next five years. The AAP will be allocated as a site the AAP (and identified as an option (evidence base used to rule out unviable options))

### **(d) Proposals sites / site allocations**

- Potential proposals are likely to be included for the station area, and peripheral sites

### **(e) Shopping policy**

- existing UDP defines shopping policy in terms of frontage, but an alternative option would be to characterise retail policy with an area-based approach. The frontage method is associated with an objective to protect designated frontage. This method is also understood to reinforce a separation between the two sides of the High Street.
- market would continue to be a priority for the Town Centre
- the Library-end of the High Street should be supported.
- Opportunities have been identified for the following, inclusion of evening economy uses as part of mix of uses in Lewisham Gateway and other Town Centre destinations; and mixed-use proposals with retail at ground floor and residential above;
- a major advantage for the AAP is that policy can be established in advance of the growth of the evening economy on the ground, enabling the resolution of potential

## ISSUES RAISED

tensions.

### **(f) Parking policy / Sustainable Living Areas**

- certain volume of car parking capacity is required for a retail centre such as Lewisham, especially given the Council's commitment to pursuing 'Metropolitan' status for LTC
- TfL's PTAL approach would need to be considered as part of a review of conventional standards.
- Conservation Area designation will also affect the approach to parking policy.
- suggested that no minimum parking standard should be set. Rather flexibility should be enabled through a maximum standard. Parking and storage continues to be a major issue for traders with shared permits with residents being a potential solution.

### **(g) Options**

The concept of an options appraisal is a theme which will be applied across the AAP

### **(i) Other issues**

As noted above, the market is an important focus for the town centre, and policies relating to this asset will be included in the shopping section of the AAP. The market is a potentially contentious site, and it is possible that the AAP process will not produce a definitive proposal or resolution. However, it was agreed that it would be a focus for the AAP process.

It was noted that a number of generic policies will be covered in the Core Strategy such as Urban Design policy, but certain aspects will be re-iterated within the AAP where necessary. Other policies will include open space, transport, housing and leisure.

It was noted that two versions of the AAP will be produced – a full report and a summary vision which is accessible for local stakeholders. On a more technical issue, it was recognised that all area-specific designations for LTC will need to be graphically represented within the AAP, but cannot be summarised on the overarching proposals map.

## **ISSUES RAISED**

### **Issues and Options consultation**

**Date:** September – October 2005

The following bullet points summarise the key findings from consultation on the Issues and Options report (please refer to Issues and Options report for further details on options):

### **HOUSING**

ISSUE LTC1: The Borough has a target of 9,750 additional dwellings to be built by 2016. How can housing need best be met in the town centre?

- Consultees expressed support for all options.

ISSUE LTC2: The Council will seek to deliver and exceed an additional 9,750 homes to be built by 2016, of which 3,160 will be affordable housing. Should there be a specific town centre affordable housing policy?

- LTC2A was the favoured option

ISSUE LTC3: How best can the AAP process promote higher residential densities in areas of high public transport accessibility?

- Respondents support the idea of an integrated approach to transport and housing in areas of high public transport accessibility to promote higher residential densities.

ISSUE LTC4: How should the AAP make provision for the traveller community?

- The majority of consultees felt that the town centre was not an appropriate alternative location for a traveller site.

### **SHOPPING AND TOWN CENTRES**

ISSUE LTC 5: How can Lewisham town centre best move towards Metropolitan Centre status?

- A majority of respondents favoured option LTC5B over option A.

ISSUE LTC6: How can Lewisham town centre's vitality and viability be best supported?

- The most popular options identified during the consultation process were options LTC6C and LTC6D.

ISSUE LTC7: If implemented Lewisham Gateway has the potential to bring wide ranging benefits to the town centre. How should the AAP address the issues associated with Lewisham Gateway?

- The majority of consultees stated a preference for option LTC7D.

ISSUE LTC8: What approach should the AAP take to the designations of core and non-core shopping frontages?

- Option LTC8C is supported by the majority of consultation respondents who wish for a geographical basis in designating retail zones which have scope to integrate a more diverse mix of uses to include evening economy. The GLA respond that the Mayor is likely to favour options C and D, advocating a holistic approach to the town centre.

## **ISSUES RAISED**

ISSUE LTC9: How should the town centre's potential for a more vibrant evening economy be managed?

- Respondents support the promotion of evening economy uses in Lewisham town centre.
- Options LTC9C and D were supported by a large number of those consulted.
- Options A and B proved less popular.

ISSUE LTC10: Should the town centre boundary be altered?

- The majority of those consulted responded that option LTC10A was the preferred option.

## **URBAN DESIGN**

ISSUE LTC11: What approach should be taken to the location and design of tall buildings in Lewisham town centre?

- The favoured option as identified through the consultation process is LTC11D. The GLA state that tall buildings should be tested by an assessment against design led criteria.

## **EMPLOYMENT AND BUSINESS**

ISSUE LTC12: What policy approach should be taken to existing established industrial areas and business uses in the town centre?

- Options LTC12C and D were expressed as the most popular approaches to existing industrial areas and business uses in the town centre by consultation respondents. The GLA state that option A is the preferred option and that existing employment uses should be protected, unless a need based study shows that they are surplus to demand.

## **OPEN SPACE**

LTC13: How should the AAP process seek to address open space provision within Lewisham town centre?

- All options are seen to have a role to play in ensuring the provision of high quality open space in Lewisham town centre and the preferred option is therefore a combination of these options.

## **TRANSPORT**

ISSUE LTC14: Should parking standards for new development be reviewed?

- The majority of consultation respondents including the GLA expressed option LTC14B as their preferred option.

ISSUE LTC15: In the context of potential significant growth in retail floorspace in Lewisham town centre, what approach should be taken to the provision of public/shopper parking spaces in the town centre?

- Options LTC15A and B were identified by the majority of respondents as the most popular approaches to the provision of public/ shopper parking spaces. The GLA offer support for option A and Transport for London state that they are in favour of no new additional parking provision within the town centre for new development, encourage the better management and rationalisation of the existing town centre spaces, and support proposals which encourage the use of public transport.

## **ISSUES RAISED**

### **ENVIRONMENT**

ISSUE LTC16: How can the AAP seek to protect and enhance the environs of the Rivers Quaggy and Ravensbourne?

- Consultees stated a preference for option LTC16A as did the GLA stating that the restoration of both river channels should be a fundamental requirement of any major development proposals for the town centre.

### **LEWISHAM GATEWAY**

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific details.
- There is ongoing engagement with owners of Lewisham Centre regarding proposals for this opportunity area.
- With respect to the issue of how to support Lewisham Town Centre's vitality and viability, consultees were supportive of options including public realm enhancements, encouraging a greater mix of units in the centre (including residential) and redevelopment at key locations within the High Street to provide marker buildings with a mix of uses. The most popular options however, were to support a greater mix of uses including cafes, bars and other evening economy uses and to make Lewisham a safer place.
- A large majority of consultation respondents also expressed a preference to develop a new role for the southern part of the shopping centre to complement the prime retail.

### **LEE HIGH ROAD**

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific details.
- With respect to Issue LTC 5, consultees supported the option to allocate new sites for retail development with regard to the retail capacity study to help the town centre move toward the floorspace required to achieve Metropolitan Status.

### **LOAMPIT VALE**

- Consultees agreed with the principle of the designation of Loampit Vale as an opportunity area; however no clear preferred option emerged from the consultation process. With respect to the issue of how Lewisham town centre can best move towards Metropolitan Centre status, the majority of respondents favoured the option of allocating new sites for retail development based on the retail capacity study. This study identified retail capacity in Loampit Vale area, particularly on the north side of Loampit Vale.

### **CONINGTON ROAD**

- The consultation response was minimal with no single option favoured over any of the others. Tesco responded stating that they remain committed to enhancing their retail offer in Lewisham and are focusing on opportunities to develop their existing store off Lewisham Road. Tesco aim to regenerate the site through the delivery of a larger, improved store. Tesco have indicated that, given the design challenges facing the area, a design competition may provide the greatest scope for an imaginative and high quality produce. Residential development and where appropriate, complementary leisure uses will form a key part of any redevelopment. Tesco support the Council's vision for comprehensive regeneration of the Conington Road area.

### **ENGATE STREET**

- Consultees agreed on the principle of the area being designated an opportunity area, however no preferred options emerged with respect to site specific

## ISSUES RAISED

details.

- Consultations with respect to the approach that should be taken for existing established industrial areas and business uses, most of the respondents favoured retention of existing employment uses and continuation of identifying Lewisham as the most appropriate location for new office development, however equally favoured the conversion of town centre accommodation to residential use. The GLA stated that existing employment uses should be protected, unless a need based study shows that they are surplus to demand.

## PREFERRED OPTIONS CONSULTATION (2007)

The following points highlight the principal feedback on the preferred options consultation which took place in 2007. A detail schedule of responses will be included as an annex to the Further Options Report in 2011.

- A number of comments on the scope of the AAP in relation to overlap with other documents in the LDF including the Core Strategy. For example, there is no specific policy position on affordable housing within the LTC AAP. In addition, the approach to developer contributions is set out in the Planning Obligations SPD.
- There is potential to include a Lewisham town centre specific flooding policy.
- Clarification is required in relation to the delivery and implementation of the key sites, many of which are coming forward as schemes, or benefit (in part at least) from planning consents.
- Objections to relaxed approach to employment land and Metropolitan Open Land.
- Opportunities for decentralised energy networks and de-centralised power etc to be investigated further as the AAP progresses.
- Sites policies are considered to be over-prescriptive by some consultees. In addition, there was an objection in relation to the use of the term 'Opportunity Area' which is already established in policy terms at the sub-regional scale.
- Requests to review the approach to Conington Road, Engate Street and Lewisham Centre.
- Update references to Lewisham Gateway scheme which now has consent.
- The approach to developer contributions in Lewisham is set out in the Planning Obligations SPD. Specific requirements on a site by site basis will be set out in the AAP.
- Strengthen the approach to the evening economy.
- A number of specific and detailed objections or statements of aspiration to the Lewisham Gateway scheme.

## APPENDIX 5: Sustainability Objectives, targets and monitoring

The following table sets out the objectives corresponding indicators, targets and sources and monitoring. Results, trends and targets are included where available.

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
<b>Social</b>							
Soc1	Affordable homes	To increase the provision of high quality affordable homes with good connectivity to public transport	Property prices (£)	Lewisham 2010 findaproperty.com	London 2010 (South East in brackets)		Annual monitoring report  Homelessness strategy
				Flats/ Maisonettes £169,917	Flats/Maisonettes £356,752 (£163,198)		
				Terraced £226,461	Terraced £482,520 (£204,975)		
				Semi-Detached £313,429	Semi-Detached £545,439 (£247,868)		
				Detached £448,946	Detached £867,820 (£430,551)		
		Number of people applying for statutory homelessness					
		Number of households in temporary accommodation					
		Number of housing completions	2008/09: 956	2001/02: 470 2002/03: 722 2003/04: 778 2004/05: 503 2005/06: 967 2006/07: 347 2007/08: 978	975 housing completions annually		
		Number of affordable housing completions	2008/09: 376	2005/06: 246 2006/07: 269 2007/08: 273 & 91 habitable rooms (off site)	429 affordable housing completions annually		

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc 2	Decent homes	To increase the provision of housing that meets decent homes standards	Housing completed to Lifetime homes standard	2008/09: Lifetime Home standard: 157 dwellings granted	2007/08: Lifetime Home Standard: 1,182 dwellings granted	All homes built to Lifetime Homes targets	Annual monitoring report
Soc3	Access to river	To increase recreational access to the Quaggy and Ravensbourne rivers	% of residents surveyed expressing satisfaction with the levels of recreational access to the river.				A natural renaissance for Lewisham , Lewisham Biodiversity Action Plan
			Length of riverside improved as part of new development				Environment Agency
Soc4	Community facilities	To increase the provision of accessible and inclusive everyday facilities	% of residents surveyed satisfied with the community facilities provision				Annual monitoring report
			Delivery of identified social infrastructure				
			Funding secured through S106			Maximise contributions	
Soc5	Heritage Environment	To protect and enhance heritage assets and their settings and utilise the historic environment in the creation of sustainable places	Levels of investment in retaining and maintaining listed buildings			Annual review of whether additional heritage assets should be listed	Annual monitoring report
			Condition of listed buildings in the local area				
			No of buildings on/added/removed from the English Heritage at risk register				

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
			Up to date conservation area appraisals and management plans for CA's within the AAP area				
Soc6	Culture	To protect and enhance cultural diversity					Lewisham Local Cultural Strategy  Creative Lewisham - Lewisham Cultural and Urban Development Commission
Soc7	Crime	To reduce crime levels in the town centre	Violent crimes per 1,000 population	2007/08: 41.1	2005/06: 34.3 2006/07: 44.9  Best Quartile 2006/07 England: 13.1 London: 21.95	2006/07: 41.8  2007/08: 22.9	ONS/ Metropolitan Police Service
Soc8	Education	To increase access to lifelong learning	People aged 16-74 with no qualifications	2008: 16,800 (9.5%) London: 12.0% GB:12.4%	2007 Lewisham: 17,000 (9.7%) London: 12.8% GB: 13.1%	Year on year decrease	NOMIS Official Labour Market Statistics  Census KS13
			Percentage of pupils achieving 5 or more GCSEs at grades A* -C or equivalent	2007/08: 54.8%	2005/06: 49% 2006/07: 54.8%  2006/07 England: 61.8% London: 63.23%	Year on year increase	NI
			Number of learners completing adult basic skills programme	2005/06: 1,600	2003/04: 1,480 2004/05: 1,550	2009/10: 1,700	NI

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc9	Social inclusion	To improve access to amenities for vulnerable members of the community.	Funding secured through S106			Maximise contributions	Annual monitoring report
			Gain and losses of community and recreational facilities completed			No net loss	
			Delivery of identified social infrastructure			Delivery in accordance with IDP	
			Number of visits to libraries	2005/06: 6,222	2004/05: 6,018	2009/10: 7,780	LAA, NI 9
Soc10	Road safety	To improve pedestrian safety in the town centre	Number of road accident casualties per 100,000 population serious or fatal				BVPI  London Borough of Lewisham
Soc11	Health	To improve inclusive access to local healthcare facilities	Mortality rate from circulatory diseases under age 75	102.94		2010/11: 70	LAA, NI 121
			Mortality rate from all cancers at age 75 or under	124.25		2010/11: 107	LAA, NI 122
			Health life expectancy at age 65	2001 11.2 (M) 13.5 (F)		2010/11: 13.8 (m) 15.8 (f)	LAA, NI 137, NHS Lewisham

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
Soc12	Noise	To reduce noise from road traffic, construction and industry	Noise complaints	2001/02: 8,147 noise complaints	2000/01: 7006	Reduction in noise complaints	LB Lewisham
Soc13	Open space	To increase the quality and provision of publically accessible open spaces	Number of applications granted or refused on designated open space	2008-09: 0	2007-08: 0	Minimise loss of open space and maximise gains	Annual monitoring report
			Number of applications within SINC's granted or refused planning permission	2008-09: 0	2007-08: 0		
			Amount of new open space provided as part of a new development	This is a new indicator and data will be collected from 2010/11			
<b>Environmental</b>							
Env 1	Effects of climate change	To ensure Lewisham town centre is resilient to climate change using mitigation and adaptation measures through sustainable design and construction	Number of homes achieving Code for Sustainable Homes level 4 or above granted and completed	This is a new indicator and data will be collected from the 2010/11 AMR		All housing built to CSH Level 4	Annual Monitoring report
			Carbon footprint of Lewisham	2008 11.84 tonnes CO2 per capita	Lewisham ranked 20 <sup>th</sup> out of 33 London Boroughs		
Env2	Flood Risk	To reduce the risk and effects of flooding	Number of permissions granted contrary to the advice of the Environment Agency	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	0	Annual Monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
			Number of permissions granted contrary to the advice of the statutory water/sewerage undertaker on low pressure / flooding grounds	TBC	TBC	0	Annual Monitoring Report
			Number of properties signed up to Environment Agency Flood Warning Direct and Extended Direct Warning services	TBC	TBC	Year on year improvement	Environment Agency
			No and size of Living Roofs granted and completed	2008-09 Granted: 6 Completed: no data		Increase in the number of completed living walls and roofs	Annual Monitoring report
Env3	Sustainable transport	To reduce dependency on private cars	PTAL score of new development	High PTAL for Catford, Lewisham and parts of Deptford		Higher density development to be located within areas with a higher PTAL	TfL
			No. of car clubs	2009/10: 8 section 106 agreements secured the provision of a 'car club'	This is a new indicator	Year on year increase	Annual Monitoring Report
			Proportion of journeys made on foot and cycle	2001: 2% (home to work trips)		To increase existing walking and cycle trips by 10% in 2012	Annual Monitoring Report
			No of new cycle facilities	This is a new indicator and data will be collected from 2010/11		All permitted development to include cycle facilities	Annual Monitoring Report
Env4	Renewable energy	To increase on-site renewable energy provision	No. and capacity of renewable energy granted and completed by type	2008/09 Completed: 4 Granted: 17  Photovoltaic Panel: 3	2007/08: No. of permission: 19  Photovoltaic Panel: 3	Maximise renewable energy by type	Annual Monitoring Report Core E3

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
				Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures:13	Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures: 9		
Env5	Energy efficiency	To increase the energy efficiency performance of existing buildings	BREEAM, Code for Sustainable Homes for other buildings	BREEAM 2008-09 Excellent Standard: 1  CSH – new indicator		BREEAM Excellent  CSH 4	Annual Monitoring report
			Per capita reductions in CO2	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	2011: 4,575 tonnes	LAA, NI 186 Defra LB Lewisham
Env6	Waste and recycling	To increase the amount of waste recycling	Percentage of waste recycled, reused or composted	2009/10: 16.8%	2008/09: 20.55%	25% waste recycled by 2012	Strategic Waste and Management, LBL
			Percentage of municipal waste sent to landfill	2009/10: 10.9%	2008/09: 3.72% 2007/08: 4.84% 2006/07: 9.47% 2005/06: 10.04% 2004/05: 10.46% 2003/04: 11.79%	Year on year reduction	Strategic Waste and Management, LBL
			Residual household waste per year	2009/10: 777kg	2008/09: 767.75kg	2009/10: 754kg 2010/11: 716kg	LAA, NI 191 Strategic Waste and Management LBL
Env7	Water quality and use	To provide sustainable sources	Promote grey water re-use and sustainable water use in				Annual monitoring report

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
		of water	new development				
			Water quality assessment				Environment Agency
Env8	Air quality	To improve air quality	Levels Exceeding Main Air Pollutant Quality Standards  Level of NO2 and PM10			As per AQMA standards	Annual monitoring report London Air Quality archive
Env9	Nature conservation	To value, protect and enhance biodiversity, maintain and enhance sites of nature conservation interest and improve water quality of local waterbodies	Changes in population of selected species			Biodiversity Plan targets	Annual monitoring report
			Change in biological and chemical river quality	A and B (Good or better) Thames Region: 2008: 3.8%		No decrease in quality	
			Length of river restored/naturalised	2008: 200m Ladywell Fields		Length restored	
			Changes in biodiversity	2008/09 No Change	2007/08 Lowland beech and yew woodland: 0.00 ha Wet Woodland: 0.09 ha Lowland mixed deciduous woodland: 38.46ha Traditional orchards: 0.69 ha Wood-pasture and parkland: no data available Hedgerows: 0.42ha Lowland meadows: 1.40 ha Lowland calcareous	Maintain and enhance the current population of biodiversity importance	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring	
					grassland: 0.00ha Lowland dry acid grassland: 40.66ha Reedbeds: 0.00ha Coastal saltmarsh: 0.03ha Intertidal mudflats: 2.55ha Rivers: 19.39ha Eutrophic standard waters Ponds: 1.96ha Open mosaic habitats on previously developed land			
Env10	Maintain and enhance townscapes and landscapes	To reduce the amount of derelict and/or contaminated land and improve the quality and design of the townscape	New and converted buildings on previously developed land	2008/09: 99% (1,097 dwellings out of 1,108 dwellings)	2007/08: 96.58% (1,045 out of 1,082)	To exceed 90% of dwellings provided on previously developed land	Annual Monitoring Report	
			No. of schemes including contaminated land remediation granted or completed					
			Amount of SINC land					No decrease in SINC land
<b>Economic</b>								
Eco1	Retail offer	To increase the diversity of the retail offer	Amount of completed retail floorspace  Number of different retail functions and types accommodated in the area	2008/09 Gross B1(a): 508 m2 A1: 2,940 m2 A2: 269 m2 A3: 716 m2 A4: 0 m2 A5: 243 m2 D2: 803 m2	2005/06: Gross: B1(a): 1,223 m2 A1: 1,189 m2 A2: 967m2 A3: 539 m2 A4: 0 m2 A5: 224 m2 D2: 77 m2	40,000 sq. m by 2026	Annual Monitoring report	

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
				Net B1(a): 458 m2 A1: 1,263 m2 A2: 189 m2 A3: 180 m2 A4: -1,265 m2 A5: 243 m2 D2: 61 m2	Net B1(a): no data A1: -65 m2 A2: 810 m2 A3: - 171 m2 A4: -870 m2 A5: 224 m2 D2: 77 m2  2006/07: Gross B1(a): 3,892 m2 A1: 635 m2 A2: 169 m2 A3: no data A4: no data A5: no data D2: 1,000 m2  Net B1(a): 3,102 m2 A1: 236 m2 A2: -390 m2 A3: -171 m2 A4: no data A5: 381 m2 D2: 885 m2  2007/08 Gross B1(a): 665 m2 A1: 2,163 m2 A2: 500 m2 A3: 633 m2 A4: 340 m2 A5: 381 m2 D2: 7,103 m2		
					Net		

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
					B1(a): 459 m2 A1: 265 m2 A2: -165 m2 A3: - 623 m2 A4: -70 m2 A5: 381 m2 D2: 5,218 m2		
Eco2	Evening economy	To encourage a vibrant, well-managed evening economy	Evening economy – available floorspace  Amount of completed leisure and A3 floorspace	See above	See above	Increase in Lewisham Town centre	Annual Monitoring Report
Eco3	Resilient economy	To ensure the town centre is capable of adapting to changes in the economy and environment	Percentage of town centre mixed use schemes			Increase year on year	Annual Monitoring Report
			Proportion of office and retail vacancy rates	2010 - 6,500 sqm retail vacancy (8%)	2010 average vacancy (national) = 11.5%	Decrease year on year	
Eco4	Local business	To increase density of local business	New business registration rate	2007: 5,390 Registration: 850  Deregistration: 450	2004: 4,595  2006: 5,065	Year on year increase	Companies House
			Percentage of small businesses in an area showing employment growth	2006/07 10.6%		2009/10: 9.5% 2010/11: 9.5%	LAA, NI 172
			Amount of completed office floorspace	2008/09 Gross B1: 1,775 m2  Net B1: -114 m2  See specific figures for A2,	2005/06: Gross: B1: 1,223 m2  2006/07: Gross: B1: 3,892 m2  2007/08	No net loss	Annual Monitoring Report - Core BD1

Ref	Topic	Objectives	Indicators	Results	Trend comparators	Borough wide targets	Source & monitoring
				B1(a) above	Gross B1: 1,209 m2  Net B1: -5,127 m2		
			Job density	2008 Density: 0.43 (77,000 jobs)	2008 London: 0.94 GB: 0.83	No reduction	ONS/NOMIS
Eco5	Employment opportunities	To increase access to local employment and reduce local unemployment	Employee jobs in Lewisham town centre	2008 Full-time: 62.2% (38,000) Part-time: 37.8% (23,100)	2008 London Full-time: 73.9% Part-time: 26.1%  GB Full-time: 68.8% Part-time: 31.2%	Increase in employment rate	ONS/NOMIS
			% of population of working age who claim unemployment benefit	10/2008- 9/2009 Economically Active: 145,400 (77.9%) Unemployed: 12,700 (8.7%)	10/2008- 9/2009 Economically Active London: 75.8% GB: 78.9% Unemployed: London: 8.4% GB: 7.4%	Decrease unemployment	ONS/NOMIS
			Number of years unemployed by age			Reduce number of years unemployed across all age bands	ONS/NOMIS



**For translation, please provide your details below:**

**Për përkthim, ju lutemi shkruajini më poshtë detajet tuaja:**

**Pour la traduction, veuillez fournir les détails ci-dessous:**

**若需翻译, 请您提供下列详情:**

**Wixii ku saabsan turjumaad, fadlan hoos ku qor faahfaahintaada:**

**மொழிபெயர்ப்பிற்காக தயவுசெய்து உங்களைப் பற்றிய விபரங்களைக் கீழே அளியுங்கள்:**

**Tercüme edilmesi için, lütfen aşağıda detaylarınızı belirtin:**

**Để dịch thuật, xin hãy cung cấp các chi tiết của bạn phía dưới:**

**Name:**

**Emri:**

**Nom:**

**姓名:**

**Magaca:**

**பெயர்:**

**İsminiz:**

**Tên:**

**Address:**

**Adresa:**

**Adresse:**

**地址:**

**Cinwaanka:**

**முகவரி:**

**Adresiniz:**

**Địa chỉ:**

**Shqip/Albanian**

**Français/French**

**普通话/Mandarin**

**Soomaali/Somali**

**தமிழ்/Tamil**

**Türkçe/Turkish**

**Tiếng Việt/Vietnamese**

**Other language (please state)**

**Return to:**

**Kthejeni tek:**

**Retourner à:**

**返回到:**

**Kusoo dir:**

**திருப்பி அனுப்புவதற்கான முகவரி:**

**Şu adrese geri gönderiniz:**

**Göi trã vè:**

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