

# Lewisham Local Plan

Consultation on Main Issues

October 2015 | Copy for Public Consultation





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### How do I comment?

The Council is inviting comments on the Lewisham Local Plan – Consultation on Main Issues (2015) as part of a formal public consultation.

This consultation runs for 6 weeks from Friday 9th October to Friday 20th November 2015.

You can respond in the following ways:

- **On-line:** [https://lewisham-consult.objective.co.uk/portal/planning\\_policy](https://lewisham-consult.objective.co.uk/portal/planning_policy)
- **E-mail:** [planning.policy@lewisham.gov.uk](mailto:planning.policy@lewisham.gov.uk)
- **Post:** Planning Policy, London Borough of Lewisham, 3rd Floor, Laurence House, 1 Catford Road, SE6 4RU

You can also respond by completing a questionnaire which can be filled out:

- On-line [https://lewisham-consult.objective.co.uk/portal/planning\\_policy](https://lewisham-consult.objective.co.uk/portal/planning_policy)

Or the questionnaire can be downloaded from our website:

- At [www.lewisham.gov.uk/myserVICES/planning/policy/Pages/default.aspx](http://www.lewisham.gov.uk/myserVICES/planning/policy/Pages/default.aspx)

Copies of the document can be viewed on:

- the Council's website [www.lewisham.gov.uk/myserVICES/planning/policy/Pages/default.aspx](http://www.lewisham.gov.uk/myserVICES/planning/policy/Pages/default.aspx)
- inspected at all borough libraries and Council's AccessPoint, Ground Floor, Laurence House, Catford, SE6 4RU and obtained by contacting the Planning Policy Team on 020 8314 7400 who will also be happy to answer any questions you may have.

## Foreword

The 'Lewisham Local Plan – Consultation on Main Issues (2015)' is about shaping the future of the borough as a better place to live, work, relax and visit. This means deciding what sort of place we want the borough to be in 2033. The solution for one area of the borough may well not be appropriate for another so the Lewisham Local Plan will need to be locally distinctive for the borough as a whole and the individual places within it.

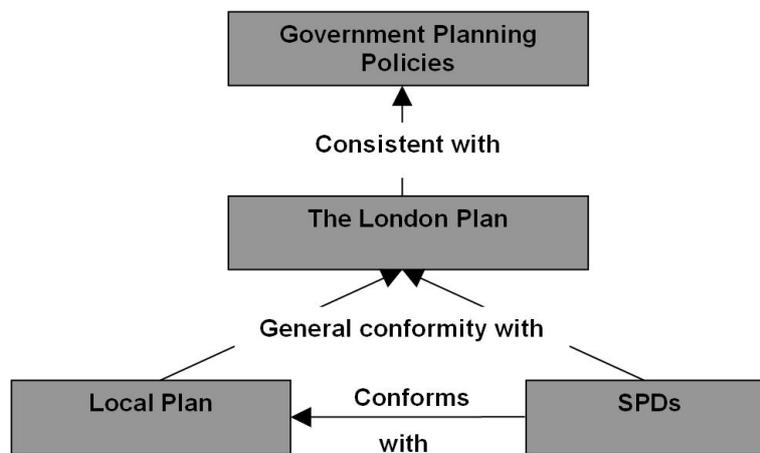
Lewisham is made up of a collection of diverse neighbourhoods and strong communities, great transport links and a thriving cultural scene. This sense of place ensures that while the borough and its neighbourhoods develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage.

A lot has changed since the Council adopted of the Core Strategy in 2011. It is clear that the requirement to provide for housing, job growth and educational facilities in the future has increased from previous years. Lewisham's population will significantly increase over the plan period. The government has significantly changed planning policy and our Local Plan needs to reflect these changes. For this reason we are looking at the key issues during this first stage of public consultation.

## Introduction

- 1.1 Lewisham adopted its Core Strategy in 2011 and now needs to prepare a new Local Plan because the Government and the London Mayor have revised their own planning policies.
- 1.2 Our new Local Plan has to be consistent with the National Planning Policy Framework <sup>(1)</sup> (NPPF) which came into force in March 2012 and in general conformity with the Further Alterations to London Plan <sup>(2)</sup> (FALP) adopted March 2015, the spatial development plan for London.

**Picture 1.1 Chain of Conformity**



- 1.3 The Local Plan will need to be informed by a robust evidence base which the Council is currently progressing. The Infrastructure Delivery Plan will be updated and will set out in general detail the infrastructure needed to support the growth and objectives set out in the new Local Plan. A framework document for the Lewisham Infrastructure Delivery Plan (IDP) is being prepared.

## Purpose of the Lewisham Local Plan

- 1.4 The process for preparing statutory Local Plans is set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. Regulation 18 represents the first (statutory) stage in the process of preparing a Local Plan and relates to the “scoping” stage of the Local Plan preparation process, where the public are asked what they think the Local Plan should contain. This initial round of consultation notifies interested people about the Council’s intention to produce a new Lewisham Local Plan.
- 1.5 This document sets out a proposed spatial strategy and identifies the main issues that the new local plan will address. It has been produced in accordance with Regulation 18 and its purpose is therefore to invite representations about the proposed content of the new local plan.

1 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

2 <http://www.london.gov.uk/priorities/planning/london-plan>

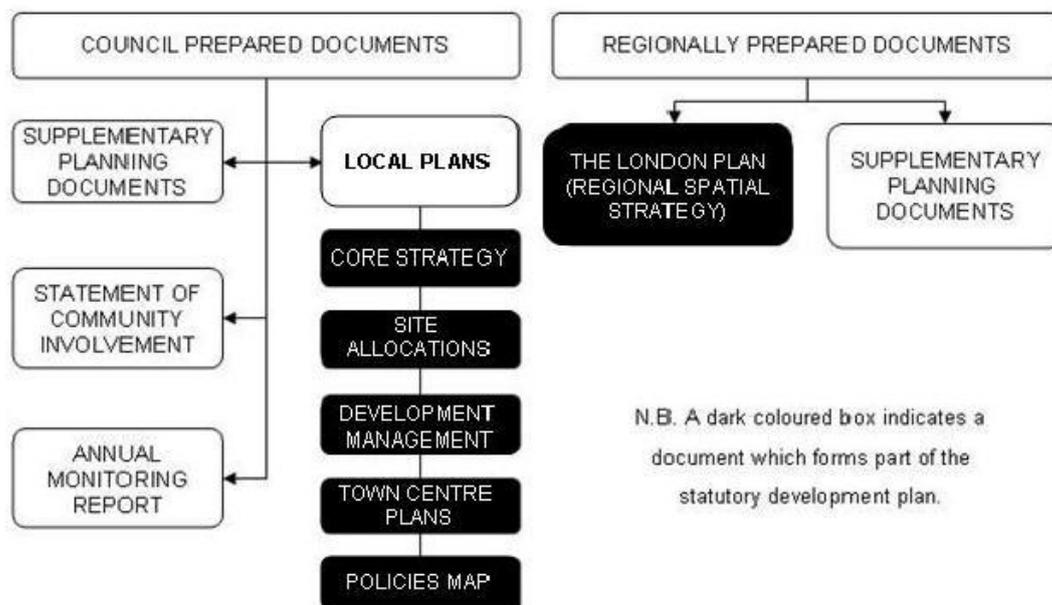
## Localism and the Duty to Co-operate

- 1.6 The Localism Act (2011) introduced a Duty to Co-operate which requires planning authorities and other public bodies to actively engage and work jointly on strategic matters. There are a number of issues such as housing, transport and waste management that have impacts that cross borough boundaries. The Council will explore constructive approaches to such issues jointly with neighbouring authorities and public bodies to ensure that strategic priorities are reflected and, where appropriate, addressed in the Local Plan.

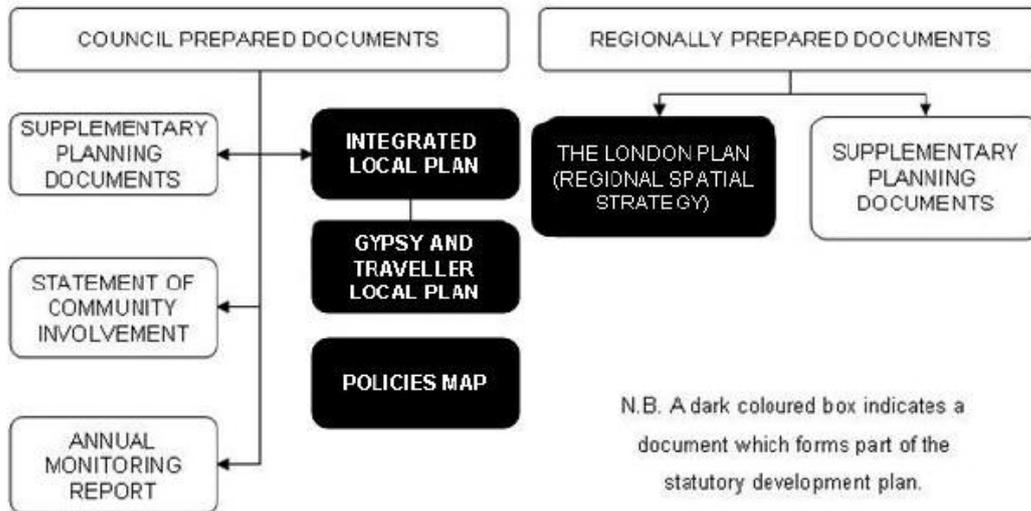
## What is a Local Plan?

- 2.1 The Lewisham Local Plan will be the key planning document for the borough. It will set out the planning strategy for growth, that is, how we will deliver the new homes and the related infrastructure needed over the next 15 years, from 2018-2033. It will identify the areas in the borough where growth is expected and how these areas are likely to change in order to accommodate that growth. It will contain the planning policies that will be used to assess planning applications in the future.
- 2.2 Alongside this expected growth, there will be a need for expanded and improved infrastructure to service a more densely populated borough. Local Plans are expected to plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the NPPF.
- 2.3 The Local Plan will eventually replace the existing Local Development Framework which is a suite of planning documents consisting of the:
- Core Strategy (adopted June 2011)
  - Development Management Local Plan (adopted November 2014)
  - Site Allocations Local Plan (adopted June 2013) and
  - Lewisham Town Centre Local Plan (adopted February 2014)

Picture 2.1 Existing Lewisham planning framework



Picture 2.2 Forthcoming Lewisham planning framework



- 2.4 The Local Plan will be supported by supplementary planning documents (SPDs) and a separate Gypsy and Traveller Site(s) Local Plan.
- 2.5 All the borough's current planning policy documents can be viewed on the Council's website, along with the Local Development Scheme (LDS) which sets out the timetable for the production of new planning documents:  
<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/Pages/default.aspx>

### Sustainability Appraisal

- 3.1 The Lewisham Local Plan will be subject to a sustainability appraisal (SA) which is an integral part of the plan preparation process. The SA involves identifying and evaluating a plan's impacts and assessing the social, environmental and economic impacts to help ensure that the plan accords with sustainable development principles. A Scoping Report will be prepared for consultation and this will inform the scope and level of the environmental information to be included in the SA Report to accompany the next round of consultation on the Preferred Options next year.

## Housing

- 4.1 The NPPF introduced some significant changes to the plan making process along with a strong focus on sustainable economic growth and a presumption in favour of sustainable development.
- 4.2 Local planning authorities are now required by the NPPF to make an objective assessment of their housing need (OAN) and ensure their local plans meet the full OAN in so far as they have sustainable capacity to do so. The NPPF states local planning authorities should prepare a Strategic Housing Market Assessment (SHMA) to identify OAN by working with neighbouring authorities within the Housing Market Area. <sup>(3)</sup> Lewisham along with the south east London boroughs of Bexley, Bromley, Greenwich and Southwark commissioned a sub regional SHMA published in 2014. <sup>(4)</sup> The SHMA identified for Lewisham, a housing need of 1,670 additional dwellings each year to meet existing and additional demand.
- 4.3 The Core Strategy (2011) set out to exceed the provision of new homes allocated in the London Plan (2008) by making provision for 18,000 new homes over the plan period 2011-2026. However the updated London Plan (2015) increased the housing target for Lewisham by requiring a minimum housing target of 1,385 per year. <sup>(5)</sup>
- 4.4 The Lewisham Local Plan will need to show how it will meet the OAN housing figure and the increased housing target required by the London Plan (2015).

## Population Growth

- 4.5 Since the adoption of the Core Strategy, the population growth for both London and Lewisham have been higher than expected. The estimated 2013 mid-year population of the borough was 286,180 <sup>(6)</sup> an increase of 4,624 (1.6%) over the previous twelve months. This growth rate is nearly twice the national growth rate. The population is estimated to have grown by 15% since 2001, whereas the national growth in this period was only 9.6%. These two numbers show that the borough's population growth is well above the national rate. Whilst the growth rate from 2001 to 2013 was slightly below the rate for Greater London, it is nearly a quarter higher than the metropolitan growth rate in the twelve months 2012 to 2013.
- 4.6 The 2014 GLA population forecasts for Lewisham show that the borough's population will grow from 294,009 in 2015 to 333,554 by 2032. The GLA 2015 age population projections show an over all increase in the majority of the age groups between 2015 to 2032. Of particular importance is the increase in the age group of 10 to 14 years old of 23.4% and for the age group 15 to 19 years old, an increase of 17.8%. It also predicts a significant ageing of Lewisham's population, including a 53% increase in people aged 65 plus and a 40% increase in the number of people aged 80 plus. Further details on age population projections are set out in Appendix 2.
- 4.7 The Lewisham Local Plan will need to manage this growth and provide for the needs of the growing population by identifying housing sites and locations for facilities and services.

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3 Paragraph 47, NPPF

4 Strategic Housing Market Assessment (2014)<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base/Pages/housing.aspx>

5 The London Plan housing target of 1,385 per annum, therefore requires a 15 year plan period provision of 20,775

6 GLA 2013 population estimates

Transport Improvement Proposals

4.8 In September 2014, Transport for London, consulted on several options for an extension of the Bakerloo line beyond its current southern terminus at Elephant & Castle which would stop at New Cross Gate, Lewisham, Ladywell, Catford Bridge and Lower Sydenham. These transport proposals could provide opportunities to intensify housing along the Bakerloo line extension.

Picture 4.1 Location of Bakerloo Line extension proposals. Source: <https://consultations.tfl.gov.uk>. September 2014.

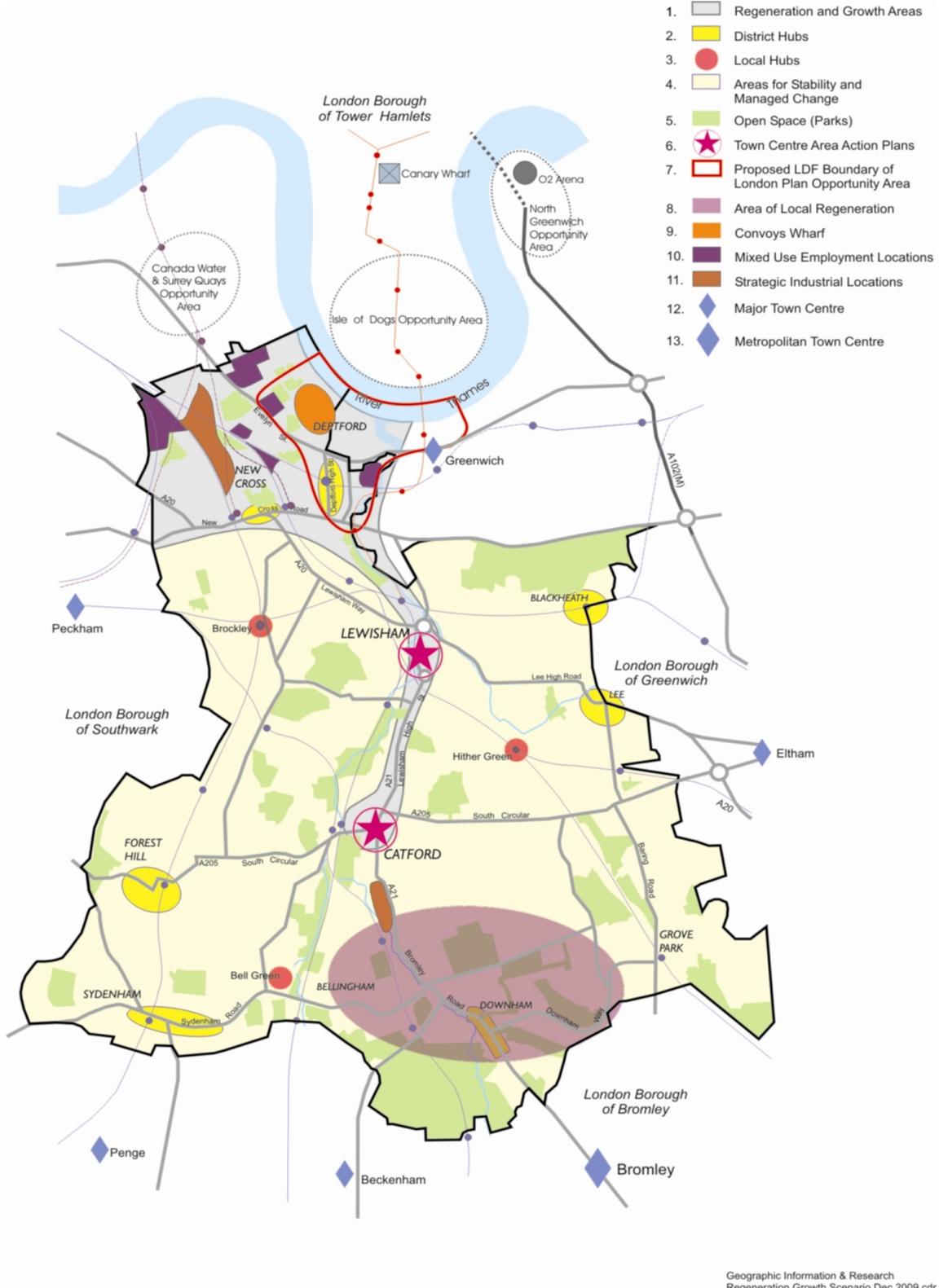


4.9 If a decision is made to progress the scheme and the necessary funding secured, it is anticipated that construction could commence in around 2023 and be completed in approximately 2030. This would fall within the latter part of the Local Plan period of 2018-2033.

**5.1** The Core Strategy sets out the current spatial strategy for the borough by shaping how each area develops and distributes growth in housing, retail and employment in a geographical hierarchy as follows:

- **Regeneration and Growth Areas** covering Lewisham, Catford, Deptford, New Cross/New Cross Gate;
- **District Hubs** covering the district town centres of Blackheath, Forest Hill, Lee Green and Sydenham;
- **Local Hubs** covering Brockley Cross, Hither Green and Bell Green
- **Areas of Stability and Managed Change** covering the rest of borough not included above; and
- **Local Regeneration Areas** focused on Whitefoot, Downham and Bellingham wards including the Downham district town centre and Southend village, Bromley Road.

Picture 5.1 Lewisham's Core Strategy Key Diagram



## Regeneration and Growth Areas

- 5.2 The regeneration and growth area (RGA) in the Core Strategy was the area identified to accommodate approximately 15,000 new homes; 100,000 sqm<sup>2</sup> of new and renovated employment floorspace and 62,000 sqm<sup>2</sup> of new retail floorspace by 2026. This area coincides with the Lewisham, Catford and New Cross and Deptford Creek/Greenwich Riverside Opportunity Areas designated in the London Plan.<sup>(7)</sup>
- 5.3 The Regeneration and Growth Areas still represent the best opportunity for growth in housing, retail, employment floorspace and educational facilities in the borough. However, we are now faced with the challenge of finding additional sites to accommodate the additional growth. The new Local Plan will therefore identify further sites in these areas.

## District Hubs

- 5.4 The District Hubs allocated in the Core Strategy focused on the District town centres of Blackheath, Forest Hill, Lee Green, and Sydenham. The District town centres are concentrations of local economic activity, supported by good public transport where shopping and other commercial activity is concentrated. However, the District town centres have very different characteristics and opportunities for growth. The new Local Plan will therefore have to re-examine the opportunities for growth in these centres.

## Local Hubs

- 5.5 Local hubs were allocated in the Core Strategy at Brockley Cross, Hither Green and Bell Green. These were places that had some limited potential for redevelopment. Overall it was considered that they had the potential to deliver a small amount of residential units. Some of this development has now taken place and the new Local Plan will examine existing opportunities for growth which may included identifying new local hubs.

## Areas of Stability and Managed Change

- 5.6 The Core Strategy defined these areas as ‘those parts of the borough which are largely residential or suburban in character and where the urban form and development pattern is established thereby limiting major physical change’. As would be expected in a well established urban area, the majority of the borough falls into this category. However, change does take place and it is thought better to simply describe this spatial category as ‘Areas of Managed Change’.
- 5.7 The scale and type of development anticipated in the Core Strategy was small scale and likely to consist of:
- Small scale residential development mostly infill and windfall sites;
  - Conversion of houses to flats
  - Change of use of shops in local parades
  - Small scale extensions and alterations to buildings

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7 The London Plan identified opportunity areas across London in order to help meet the challenges of economic and population growth. These opportunity areas represent London’s largest development opportunities. The updated London Plan (2015) expects the opportunity areas to accommodate much of the capital’s growth, with capacity for approximately 575,000 jobs and 303,000 additional homes.

### Local Regeneration Areas

- 5.8 The Core strategy focused this spatial category on the wards of Whitefoot, Downham and Bellingham. However, few sites for redevelopment were identified in these area and the policy approach of other areas were applied. It is therefore proposed to drop this classification in the new Local plan.

### Managing Future Growth

- 5.9 The current spatial strategy was designed for accommodating growth and given the expected population and household growth this is likely to continue in the future. It is considered that the strategy has been working and is delivering the growth needed in the places identified. However, to meet the new targets for homes and associated infrastructure additional sites will have to be found. It is therefore proposed to continue with the growth strategy but to look more carefully for new sites to accommodate future household growth. The major contribution will continue to come from the regeneration and growth areas of Catford, Lewisham, Deptford and New Cross, whilst opportunities for new development and intensification of development in the district and local hubs will be explored. The majority of the borough is classified as an area of stability and managed change and it is proposed that this spatial category is changed to 'Areas of Managed Change' in the new Local Plan. This is because even small scale change like those mentioned above for households, infill development and change of use can have an impact on the character of the area and the new local plan will include policies to guide and direct these changes.
- 5.10 Given the level of growth that must be accommodated in the borough, and the change that this will bring with it, the key challenge is to create high quality places for people to live in, work in and visit.
- 5.11 If Lewisham's places are to grow, they must do so in a way that is true to their existing locality and nature. They must grow with an appreciation of the existing quality and function of the place, including the urban form, landscapes, access, culture, topography, building types, materials and local climate, all of which is necessary to nurture local distinctiveness.
- 5.12 Growth should be based on an understanding of the existing situation, and what is likely to be appropriate in the future. A focus on shaping different and distinctive places has the potential to reinforce local character, protect valuable assets and create places with a real sense of identity.
- 5.13 However, development that delivers the needed growth should be creatively designed and not unduly constrained by existing architecture. It will be important in developing a sense of place that creative and innovative design is considered as well as responding to what already exists.
- 5.14 The following five principles set out how Lewisham's places should be shaped. These principles apply to all Lewisham's places, no matter where they are in the growth hierarchy, and no matter how much growth the place will accommodate.
1. Places are for people. They have distinctive characters and must be safe, comfortable, varied and attractive.
  2. Places must add value to what already exists. The character of a place is about people and communities as well as the physical components.
  3. Places are connected and overlap – boundaries, edges and transitions are important and places must be easy to get to and move around in.

4. Places must be economically viable.
5. Places must be flexible and respond to change.

- 6.1** The provision of housing is a key priority and pressure for the borough. Lewisham's housing policies need to be updated to respond to the recent changes in national and regional policy. The NPPF sets out the governments requirements for how local planning authorities are to plan for housing.<sup>(8)</sup> They also needs to respond to the existing and forecast increase in local housing need and population growth.

### Lewisham's Housing Need

- 6.2** The demand for housing in the borough and across London continues to rise. The updated London Plan (2015) increased the housing target for Lewisham borough from 1,100 to 1,385 new dwellings per year. Whilst the South East London SHMA (2014) found that as a result of population growth which affects the rate at which new households are formed and immigration, 1,670 additional dwellings are required each year to meet existing and additional demand. The Council therefore needs to identify enough housing sites in the borough to accommodate this number of dwellings over the Local Plan period of fifteen years from 2018-2033, this totals 25,000 additional dwellings.
- 6.3** As Lewisham's housing needs are considerably higher than previously assessed, the Council is:
- Updating its Strategic Housing Land Availability Assessment (SHLAA). The SHLAA will identify available and suitable sites to accommodate housing in order to meet Lewisham's need for housing over the plan period. This will involve research to identify possible additional sites and reviewing previously considered sites that were not progressed
  - Quantifying committed and likely housing projects by Lewisham Homes and registered providers of social housing
  - Carrying out a call for sites – inviting the community to nominate sites for consideration for housing development
  - the Council's Housing Service will be delivering new homes through the building of new homes and estate renewal where appropriate
- 6.4** Whilst the Council can identify sites (preferably within the borough) to meet this need, it cannot force developers or site owners to lodge applications to develop, or to act on planning permissions, or to complete the developments within any timeframe. These matters are influenced by wider economic and financial considerations, based largely on how profitable housing development is at the time.
- 6.5** If the borough has insufficient capacity to accommodate its housing need, then it may be able to negotiate with adjoining boroughs with spare capacity, to accommodate some of Lewisham's need, based on the duty to co-operate as set out in the NPPF.
- 6.6** The Council maintains a database of a five-year supply of housing, made up of sites where permissions are granted and construction is either underway or a start date for construction is known. The capacity of sites is calculated using the sustainable residential quality density matrix in the London Plan. This database is kept up to date on a rolling basis. The Council also maintains a database of sites sufficient to meet a fifteen year demand for housing. The updates are published in the Planning Service Annual Monitoring Report.

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8 Paragraph 47 to 53, NPPF

## Affordable Housing

- 6.7 Since the Core Strategy was adopted, changes to the definition and delivery of affordable housing have been made through the NPPF<sup>(9)</sup> and the updated London Plan (2015). The NPPF requires local planning authorities to plan for a mix of housing types based on current and future demographic trends, and where they have identified that affordable housing is needed, set policies for meeting this need on site. It also changed the definition of affordable housing by introducing a new tenure called 'affordable rented housing'.<sup>(10)</sup>
- 6.8 The evidence presented in the South East London SHMA shows there is a pressing need for affordable housing in the borough. This is in part caused by the increasing house prices in Lewisham and the borough's low household incomes in comparison to the London average household income. It also found that 60% of the demand for affordable housing is for three or four bedroom dwellings. The current Core Strategy policy expects the provision of family housing (3+ bedrooms) as part of any new development with 10 or more dwellings.
- 6.9 The current affordable housing policy in the Core Strategy seeks the maximum provision of affordable housing with a strategic target for 50% affordable housing from all sources. It also states contributions to affordable housing will be sought on sites capable of providing 10 or more dwellings. This would be subject to a financial viability assessment. To ensure a mixed tenure and promote mixed and balanced communities, the affordable housing component is to be provided as 70% social rented and 30% intermediate housing.
- 6.10 Given the degree of need for housing assistance, the Council believes 50% is an appropriate target for affordable housing for the borough – whether as social housing or shared ownership. Increases in house prices and rental levels mean that social rent at affordable market levels (80% of market rent) and shared ownership are both becoming inaccessible for more and more people. To make social rent more affordable the new Local Plan could incorporate a planning policy to cap social rent.

## Vacant Building Credit

- 6.11 The 'vacant building credit' is a new Government policy to encourage housing development on brownfield sites by introducing a credit to offset the costs associated with bringing brownfield sites back into use. The National Planning Practice Guidance (NPPG) explains that where vacant floorspace is brought back into use for residential purposes, no affordable housing contribution need be paid on that portion of the development. This is both in terms of on-site construction of affordable units as well as financial contributions for off-site provision.<sup>(11)</sup>
- 6.12 The 'vacant building credit' is likely to reduce the amount of affordable housing that can be delivered in the borough. The Government has been recently challenged in the High Court by a local planning authority on the affordable housing threshold and the vacant building credit. The judge has ruled these policies should be withdrawn but the Government have said they will appeal so there is uncertainty over the future of this policy.

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9 Paragraph 50, NPPF

10 Annex 2, NPPF - defines affordable rented housing as a form of social housing. This new tenure is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent.

11 Paragraphs 21 to 23, NPPG

### Housing Standards

- 6.13** Following the Government's Housing Standards Review which aimed to simplify government regulations and standards into one key set, the Building Regulations will now set the national standards for water efficiency, security, accessibility and energy.
- 6.14** A national internal space standard closely based on the existing London Housing Standards will be applied through the planning system. If Lewisham Council wants to require an internal space standard i.e. a minimum size for a room, it can only do so by including a reference in the new Local Plan to the nationally described space standard. The Council will not be able to require any higher internal space standards.
- 6.15** The new Local Plan will need to set out the Council's approach on accessibility, by demonstrating the need for accessible and adaptable dwellings and wheelchair user dwellings. The Building Regulations set out a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings. The NPPG is clear that local plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

### Specialist Housing

- 6.16** Provision will need to be made to meet the housing needs of Lewisham's new and existing population in the new Local Plan. The short and longer term supported housing needs of vulnerable and disadvantaged groups will need to be understood and reflected in the new Local Plan. The London Plan seeks to protect against the loss of housing including hostels that meet an identified housing need, unless it can be satisfactorily re-provided. <sup>(12)</sup>
- 6.17** The number of older residents is increasing in the borough and many of these people have specialised housing needs which the new Local Plan must take into account. This form of housing includes care homes, sheltered accommodation and extra care accommodation.
- 6.18** The introduction of new housing standards on accessibility means that the new Local Plan will need to opt in to these technical standards for accessible or adapted for wheelchair users.
- 6.19** There is also a need for student accommodation in the borough. However, such complexes need careful management to protect the amenity of neighbours so it is important that student housing schemes are purpose-built for specific institutions, rather than being built speculatively. This form of housing needs to be built close to or located with good public transport connections to the university with which it is associated.

### Infill, Backland and Back Garden Developments

- 6.20** The NPPF encourages Councils to set out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.
- 6.21** There are a number of sites within the borough's residential areas that could come forward for development which require careful consideration. They are:

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<sup>12</sup> Policy 3.14 Existing Housing, The London Plan (March 2015)  
<https://www.london.gov.uk/priorities/planning/london-plan/further-alterations-to-the-london-plan>

- Infill sites are sites located within street frontages such as former builders yards, gaps in terraces and gardens to the side of houses. These types of development will be permitted where they make a high quality positive contribution to the area and respect the character of existing houses.
- Backland sites are defined as 'landlocked' sites to the rear of street frontages not historically in garden use e.g. small workshops. The creation of sites for new dwellings ('backlands') is only supported where there is proper servicing and access, and adequate privacy and amenity are retained for adjoining dwellings.
- Back gardens are private amenity areas so developments on these spaces will not be supported as they are no longer considered to be previously developed land with a presumption in favour of development.

**6.22** The Development Management Local Plan sets out the current policy on this and this policy approach will continue in the new local plan.

### Conversion of Larger Dwellings to Flats

**6.23** There is pressure in the borough for the internal subdivision of large dwellings to create a number of flats, but this reduces the number of larger dwellings (3 or more bedrooms) available. As most new dwellings built are one or two bedrooms (mostly flats) there is a need to conserve the stock of larger dwellings. Therefore current policy not to permit further such subdivisions is unlikely to change.

### Conversion of Offices to Dwellings

**6.24** In 2013, the Government amended the planning legislation, so that planning permissions are not required to convert empty office floorspace to housing. Although this contributes towards increasing the local housing supply, there is a risk of losing employment space and the impact this will have on town centres as well as district and local hubs. In some cases the conversion of ground floor offices is resulting in poorly designed frontages which have a negative impact upon the streetscape.

### Houses in Multiple Occupation

**6.25** Although there is a need for this type of occupancy<sup>(13)</sup>, such dwellings need to be located close to good public transport and not cause nuisance or disturbance to neighbours or to the wider neighbourhoods in which they are located. The need for Houses in Multiple Occupation, notwithstanding other planning considerations, means that they should be built and finished to a high standard, in order to avoid the poor quality of accommodation that often characterises short-term housing.

**6.26** The Council is aware of illegal and substandard houses in multiple occupation (HMOs) in some parts of the borough and is moving to have these returned to legal forms of occupation and to have illegal building work regularised or removed as appropriate.

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13 Houses in multiple occupation (HMOs) are dwellings accommodating six or more unrelated persons.

### Residential Design at Higher Densities

- 6.27 The need to achieve the maximum practical use of sites means new buildings will need to be taller. Not all locations are suited to taller buildings, and the visual impact of taller buildings is much greater. In particular, the view corridors to significant points such as St Pauls Cathedral are protected, and there are stringent height restrictions in these corridors.
  
- 6.28 The increase in housing need means that more attention will need to be given to the quality of residential design at considerably increased densities where residential redevelopment occurs. Higher density and taller building require an appreciation of a different relationship between building than at lower heights and densities. The Council is presently reviewing its design controls to specifically respond to these issues by developing location and design guidelines for tall buildings – these are generally taken as being more than ten storeys high.

**Picture 6.1 Higher density development at Lewisham High Street**



Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

- 7.1 Improving the local economy is a key issue for the borough. The Lewisham Local Plan will need to support economic growth by encouraging innovation and investment, supporting new and growing businesses and ensure land is safeguarded to meet the needs of growing businesses. The borough has particular advantages for business such as good public transport and a good representation in a number of growing sectors.
- 7.2 The new Local Plan will need to continue to recognise the importance of creative industries to the borough's economy, with these activities currently clustered in parts of Deptford, New Cross and Forest Hill.
- 7.3 The Lewisham Employment Land Study (2008) is currently being updated and will be used to prepare the next formal stage of Plan making following this consultation exercise including the possible release of some employment land for housing. The Greater London Authority (GLA) also publishes evidence about how much of this sort of land is expected to be lost over the next few years, how much office space will be required, and the number of jobs expected to be generated in the borough.

### Lewisham's Economy

- 7.4 Lewisham has one of the smallest economies in London and has a small proportion of land occupied by these buildings. Most people in Lewisham commute to jobs elsewhere in London. It is a deprived borough with many areas suffering from higher than average levels of unemployment. Most firms in Lewisham are very small and employ few people. The major local employers are in the public sector either the National Health Service or Local Government, or other public sector providers. Many local businesses provide goods and services local to the London economy rather than to the national market, and which are complementary to the retail uses in local town centres. This includes such uses as bakers, printers, couriers, car and taxi repairs and office cleaning firms. Creative businesses have become a significant element in the Deptford New Cross area clustering around Goldsmiths College, which offers courses in the arts, and the Trinity Laban Dance Centre on Creekside. They are also represented in other parts of the borough such as Forest Hill.
- 7.5 In the short term, public sector employment will continue to shrink and opportunities for business and job creation and local economic initiatives might be stifled, except for shorter term jobs in the construction sector. However as more people arrive to live in the borough this will inevitably generate an increase in economic activity and hence more local jobs will be created as a result.

### Employment Sites and Buildings in Lewisham

- 7.6 The borough has a core of heavier industrial uses at Surrey Canal Road in the north of the borough including sites used for waste transfer and waste incineration, and an area of land in Bromley Road just south of Catford which provides important warehouse facilities and a large bus garage. Both these sites are protected by policies in the London Plan and by local planning policies.
- 7.7 Other areas of industrial and warehousing land are smaller, are protected by local policies, and usually comprise relatively modern purpose built workshop/warehouse units.
- 7.8 There are also small premises in these uses scattered throughout the borough such as small builder's yards and car repairs.

- 7.9 The Lewisham Employment Land Study (2008) identified a demand for modern good quality premises for small businesses, such as the purpose built units in the smaller protected industrial areas, and also that much of the borough's stock was poor quality and did not meet this demand.

### Employment Land in Lewisham - Past and Future Trends

- 7.10 Over the past 20 to 30 years these uses have been in competition for land from housing which can command much higher land prices. Lewisham, along with the rest of London, has faced an on-going decline in the amount of land dedicated to factories and warehouses, and now, as a result has one of the smallest economies in London. Rental yields for these properties in Lewisham are low, which make the development of new industrial buildings in most cases unviable without some form of financial support. Many of the former industrial uses have relocated to the edge of London with better access to the strategic road network. This process will inevitably continue with the pressure on land generated by increased housing targets discussed elsewhere in this consultation document. But to provide a sustainable economy within London, land will need to be maintained in these uses, otherwise these services will have to be provided from outside of London which would increase costs and generate increased traffic.
- 7.11 The Council has in the past succeeded in preventing some of the decline by protecting a core of better quality business sites (Strategic Industrial Locations in Surrey Canal Road and Bromley Road and Local Employment Locations<sup>(14)</sup>), while allowing a release of poorer quality large sites in the north of the borough for high density mixed use housing developments. These sites for the most part did not provide large numbers of jobs. In order to ensure the continuation of business uses on these sites the Council required that 20% of the built out floorspace should be business premises with the expectation that more jobs would be provided and the type of jobs available would be more varied. The development of the business uses was cross-subsidised from within the mixed use development, by the provision of high density housing, as noted above this provision would be unviable. The redevelopment and establishment of these mixed use sites is still at an early stage, and some of the sites have in fact not yet been redeveloped.
- 7.12 The Council will continue to protect the larger industrial sites at Surrey Canal Road and Bromley Road (called Strategic Industrial Locations in the London Plan), which house uses that enable the continued industrial functioning of London, but will keep the boundaries of this land under review.
- 7.13 The Council protects the smaller local sites of better quality industrial premises (Local Employment Locations), but has a more permissive policy on the release of smaller scattered business sites and premises in town centres and residential areas. These sites have in recent years been consistently well occupied with low vacancy rates.
- 7.14 The Council is also considering supporting 'business incubator units' that will support small business starts. This type of accommodation is being supported by Goldsmith's College with the intention of supporting creative uses in the Deptford New Cross Area.

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14 Local Employment Locations are at: Blackheath Hill, Creekside, Endwell Road, Evelyn Street, Lewisham Way, Malham Road, Molesworth Street, Stanton Square, Willow Way, and Worsley Bridge Road.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

- 8.1** Retail is an important part of the local economy and the largest employer in the private sector employing about 10,000 people locally. In addition the goods and services provided are vital to the resident, visitor and working population. It is therefore important for the borough that the planning system does what it can to protect and improve the shopping centres. The new Local Plan will need to consider changing retail trends when planning for future retail development in the borough.
- 8.2** The Government has introduced a number of changes to planning policy that impact on the retail sector. Most notably changes to the General Permitted Development Order (GPDO) and the Use Classes Order (UCO) which mean that a change of use of a shop to residential or some other type of business no longer requires planning permission, although prior approval is required for some change of use.

### Lewisham's Retail Hierarchy

- 8.3** The Core Strategy (2011) sets out the planning policies in relation to retail issues. This includes defining the retail hierarchy for the borough as follows:

**Table 8.1 Lewisham's Retail Hierarchy**

Major town centres	District town centres	Neighbourhood local centres	Out of centre	Parades
Lewisham	Blackheath	Brockley Cross	Ravensbourne Retail Park, Bromley Road	There are about 80 parades scattered throughout the borough
Catford	Deptford	Crofton Park	Bell Green	
	Downham	Downham Way		
	Forest Hill	Grove Park		
	Lee Green	Lewisham Way		
	New Cross			
	Sydenham			

- 8.4** The different centres perform a different role and function within the retail hierarchy. Appendix 1 gives a brief explanation of the role and function of these centres.
- 8.5** The Council surveys the major and district centres annually and the neighbourhood local centres and local parades every 5 years. This provides good evidence about the health of these centres. The latest retail surveys can be viewed on the Council's website. <sup>(15)</sup>

15 <http://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base/Pages/LDF-evidence-base-employment-and-retail.aspx>

- 8.6 In addition to the above the Planning Service commissioned a Retail Capacity Study in 2009<sup>(16)</sup> to inform the development of the Core Strategy. This study looked at the amount of retail expenditure in the borough and the amount of retail floorspace to determine what growth might be needed to sustain the retail pattern over the 15 year plan period. This study will be updated to inform the new Local Plan and any issues raised by the study will be consulted on. In the past a growth in population has led to a demand for more retail space.

**Picture 8.1 Lewisham's Town Centres**



- 8.7 Lewisham town centre is the largest and most varied shopping centre in the borough. The town centre local plan set out an aspirational policy to raise the centre up the London hierarchy from a Major centre to a Metropolitan centre. This would require a substantial increase in shopping floorspace of between 20,000 – 40,000 square metres. A significant proportion would also have to be comparison floorspace.<sup>(17)</sup>

16 Retail Capacity Study 2009  
<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base/Pages/LDF-evidence-base-employment-and-retail.aspx>

17 Comparison goods including clothing, shoes, furniture, household appliances, tools, medical goods, games and toys, books and stationery, jewellery and other personal effects.

- 8.8** Catford is our second largest centre and classified as a Major centre in the London Plan. It has a variety of retail offer including 'out of centre' type development opposite Catford Station (Wickes and Halfords) and at the 'Catford island site', formed by the one way traffic system on the A205, Plassey Road and Sangley Road; a rather old fashion 1970's town centre based around Tesco and a linear development of shops along Rushey Green and Catford Broadway. This split in retail offer causes some problems for shoppers who have to cross busy roads to reach the different offers.
- 8.9** Catford town centre consists mainly of independent retailers, with very few national multiples retailers. Only five of Goad's 31 major retailers are present in the centre. Overall, the comparison offer in the centre is weak as it has very few key attractors and consists mainly of low value and discount retailers.
- 8.10** The district shopping centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham all have a different role and function (see Appendix 1). Some like Blackheath and Downham have very low vacancy rates while Lee Green, Sydenham and Forest Hill have higher vacancy rates. Lee Green is a run down district shopping centre and the current planning policy is to recommend comprehensive redevelopment. The Council has a current planning application for large scale redevelopment of this centre anchored by an Asda store. This application is not part of this consultation.

### Local Centres and Parades

- 8.11** The Core Strategy designated Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way as neighbourhood local centres. The borough also contains about 80 local shopping parades. The current policy is to protect shops from a change of use where there is an economic demand for such services. The latest survey data shows that the overall number of shops in the smaller centres and parades has fallen. Some have high vacancy levels while others appear very successful.

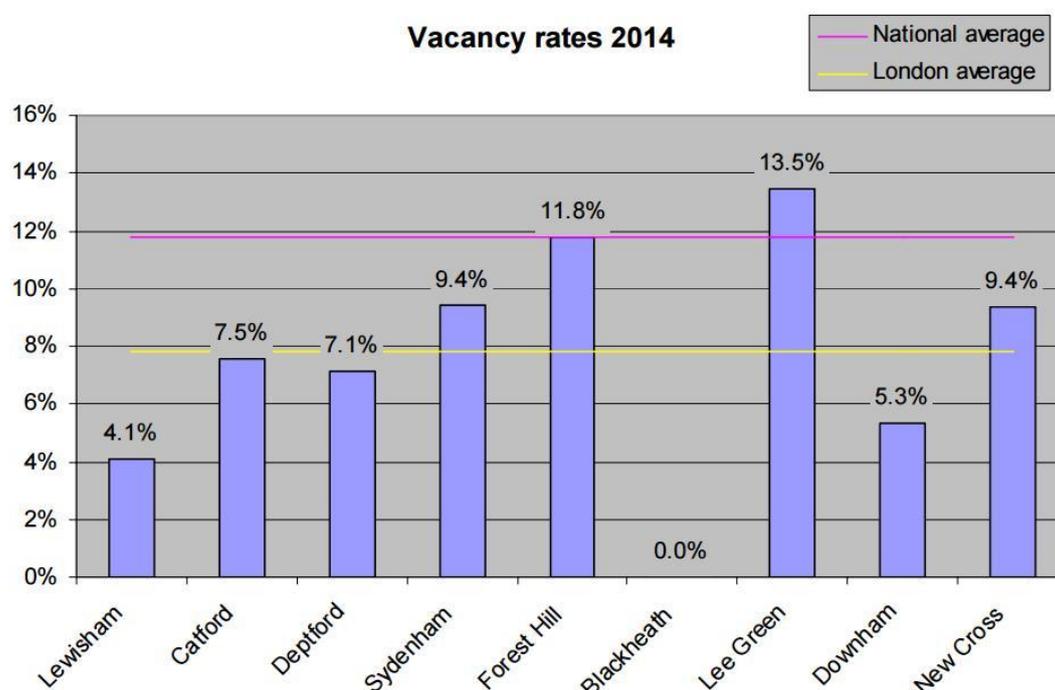
### Retail Vacancy Rates

- 8.12** Nationally, the retail sector was badly affected by the economic recession of 2007/8 with many national names going out of business. This led the government to commission the 'Portas Review' (2011) which found a reduction in spending in high streets and an increase in vacant property.<sup>(18)</sup> Another issue the Review highlighted was the changing nature of retailing, in particular the growth of internet shopping.
- 8.13** In Lewisham, the vacancy rate has been below the national average but still relatively high and hence an issue to be addressed (see graph below). However, the vacancy issue is important as it can start a spiral of decline if vacant units are not re-let quickly. The retail centres all have varying vacancy levels. It may be a better option to allow a change of use (COU) of a shop to residential rather than accept a long term vacancy. It may be appropriate to differentiate the policy approach by centre type by having a more restrictive policy on COU in the healthy retail centres and a more relaxed approach in the centres with the highest levels of vacancies.

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18 The Portas Review: An Independent review into the future of our high streets (2011)  
<https://www.gov.uk/government/publications/the-portas-review-the-future-of-our-high-streets>

**Picture 8.2 Vacancy Rates in Lewisham Borough 2014 (Taken from Town and District Centre Retail Report 2014 Part I: Issues and trends)**



### Quality of Shopping in Lewisham

- 8.14** Attractive town centres not only need to have the variety of shops and services to attract customers but should also offer a pleasant environment. The design of new buildings and the urban design considerations that make town centres pleasant places will therefore need to be considered in the new Lewisham Local Plan. In order to support the viability of town centre retail, some car parking provision is needed.
- 8.15** Locating shopping facilities near transport interchanges will also ensure they are accessible. This will support local businesses and retain expenditure in the borough by reducing the need to travel.
- 8.16** There has been some concern about the type of businesses that operate in the town and local centres. The COU from a shop to a different type of business like a restaurant or housing is now allowed without the need for planning permission. This means that Core Strategy policy which designates primary and secondary frontages within major and district town centres in order to maintain essential services and contribute towards their vitality can no longer be implemented. However, protecting a variety of shops to maintain the viability of the centre is still a planning objective.
- 8.17** The percentage of units in the primary shopping frontage in a shop use in Lewisham, Deptford and Downham is at least 70% while Forest Hill and Lee Green have less than 50%. The definition of a shop for planning purpose is a use classified as A1 in the Use Class Order 1987 (as amended).<sup>(19)</sup> If there were no limits on the percentage of A1 units in these centres then would more vibrant centres be created?

19 Town and Country Planning (Use Classes) Order 1987

- 8.18** There has been community concern over the number of betting shops, pay day loan shops and fast food take away shops in some centres. The Government has changed the use class order so that betting shops are now in a separate class to other shops and this means planning policy can be used to control the number of such uses in any one centre. Due to the obesity problem in Lewisham, the current planning policy seeks to limit the extent of fast food take away shops near to schools. Planning is only part of the solution and the complex nature of obesity needs a multi agency approach.

### Out of Town Retailing

- 8.19** Out of centre retail development has been a growth industry over the past 20 years or more. In order to protect the vitality and viability of existing shopping centres planning policy needs to direct large scale retail to the major and district town centres. The retail capacity study will be updated and this should provide evidence of need for such development but it is always possible for an opportunist planning application to be made and hence planning policy needs to address this issue. The NPPF recommends a sequential test for the location of large scale retail.<sup>(20)</sup> That is, planning policy should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

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20 Paragraph 24, NPPF

## Delivering Transport Infrastructure

- 9.1** The Mayor of London, through Transport for London (TfL) manages the Transport for London Road Network (TLRN) and is also responsible for buses and the Docklands Light Railway (DLR). Network Rail is responsible for infrastructure planning for the railways. Lewisham Council is responsible for the local highway network and seeks to work in partnership with these other transport providers.
- 9.2** Congestion on the rail network is considered a problem by many residents. Lewisham Borough Wide Transport Study (2010)<sup>(21)</sup> found that most rail routes through Lewisham are loaded beyond crush capacity limits in the morning peak.
- 9.3** TfL and Network Rail plan a number of improvements to public transport that should benefit borough residents. These include, but are not limited to, the following:
- capacity enhancement to the rail network
  - the Bakerloo Line extension
  - increase frequency of buses
  - new Surrey Canal Road Station
  - London Overground extension
  - A205 Catford Town centre road improvement
- 9.4** A London Overground extension from New Cross will enhance the services through Hither Green and Grove Park. However, the local rail network currently has insufficient capacity to allow the extension to serve Lewisham station. The additional capacity created by the Bakerloo Line extension may however, allow the extension to serve Lewisham station.
- 9.5** There are poor levels of transport accessibility in the south of the borough and improvements are needed to improve bus service frequency. Funding for new buses will be sought through planning obligations to support these improvements.
- 9.6** The Catford loop is a suburban stopping service which covers the following stations: Denmark Hill, Peckham Rye, Nunhead, Crofton Park, Catford, Bellingham and Beckenham Hill. It has a poor frequency of trains running through the borough so the Council is lobbying to increase the frequency of these trains.
- 9.7** The new Local Plan needs to support the early implementation of these and any other schemes that can be identified.
- 9.8** Local transport improvements are implemented by the borough using money from the GLA for local schemes. This is set out in the Local Transport Implementation Programme (LIP). Lewisham's LIP sets out our agreed transport priorities up until 2031, plus more detailed

**Picture 9.1 Improving transport infrastructure**



21 Lewisham Borough Wide Transport Study (2010)  
<https://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base/Pages/LDF-evidence-base-infrastructure.aspx>

three-year delivery plans which highlight major schemes and new infrastructure projects designed to support and/or facilitate the growth and regeneration of the borough. Annual updates are submitted to TfL for review and approval.

### Location of Major Developments

- 9.9** The London Plan and the Core Strategy both promote the location of major new development, particularly residential, in locations with good public transport or that can be improved to provide good access.
- 9.10** The identification of development sites and residential capacity should be considered in the light of public transport access. Related to this is the continued need for major development to provide travel plans alongside planning applications so the impact can be assessed and mitigated.

### Parking

- 9.11** The idea of sustainable transport means that in areas of good public transport car parking provision should be limited. However, limited car parking needs to go together with limited on street car parking through controlled parking zones (CPZ). We do not currently have borough wide CPZ coverage and hence limited parking provision within development can potentially spill over into surrounding streets. An integrated approach is needed which links restricted provision with CPZ and the ability of new development residents to access residents parking permits.
- 9.12** For major residential developments, the incorporation of car clubs as part of the development reduces the use of the private car. The new Local Plan will only consider car limited major residential development where there is on site accessible priority parking for disabled drivers.
- 9.13** The Mayor of London is reviewing the parking standards in outer London and proposes to keep the standards for inner London which the borough uses (see Appendix 3). It may therefore be necessary to see how the London Mayors proposals are received and consider introducing local parking standards if necessary. Parking for disabled will always be required in new developments.
- 9.14** Government changes to national planning policy on parking standards are set out in the NPPF <sup>(22)</sup> and the following text also needs to be taken into account “Local planning authorities should only impose local parking standards for residential and non-residential development where there is clear and compelling justification that it is necessary to manage their local road network”. The Mayor of London does consider there is compelling justification for restrictive parking in inner London.

### Promoting Sustainable Movement

- 9.15** New development provides opportunities to improve connectivity throughout the borough for pedestrians and cyclists, provide new accessible public spaces and contribute towards improving the relationship with the river Thames.
- 9.16** The borough has varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way, the Thames Path and the river and waterways network.

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22 Paragraph 39, NPPF

- 9.17** Making places attractive for walking and cycling through public realm improvements has multiple benefits by reducing traffic congestion and greenhouse gas emissions, improving accessibility, viability of a place and contributes to the health and well-being of residents. Increasing the provision of cycle parking in town centres will encourage the use of sustainable modes of transport.
- 9.18** Providing safe routes for cycling and pedestrians forms part of designing safe places. Development will be expected to address these issues. Designing out crime around transport stations and ensuring good lighting will contribute towards improving the perception of safety.
- 9.19** The Core Strategy promotes Waterlink Way, the Thames Path and Deptford Links projects for improving cycling and walking opportunities in the borough. The North Lewisham Links Strategy is a programme of works aiming to improve walking and cycling routes across Deptford and New Cross in order to encourage residents to make better use of local amenities and public transport and to encourage more active lives. These projects are being delivered using planning obligations to fund these improvements.
- 9.20** The Mayor of London's proposals for the Cycle Superhighway includes two proposed routes, one from Evelyn Street to Greenwich and Queens Road Peckham to Lewisham. The Mayor of London also proposes two Quietways routes which impact on the borough and they are Waterloo to Greenwich and Waterlink Way. These proposed cycle routes will be supported in the new Local Plan.
- 9.21** The use of the river Thames for sustainable transport choices, including the transport of people and freight such as the transportation of construction and waste materials from development sites will continue to be supported in the new Local Plan. As part of the Convoys Wharf redevelopment, a new river terminus will be built which will increase the number of passengers using river Thames.

### Protecting Essential Transport Infrastructure

- 9.22** The borough has two bus garages at New Cross and at Bromley Road in Catford. The London Plan has a policy to protect essential transport infrastructure. While the Bromley Road bus garage is part of an area designated as a Strategic Industrial Location and therefore given some policy protection, the New Cross bus garage does not have any specific policy protection. The new Local Plan could protect these transport facilities and any others which come forward.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

## Climate Change

- 10.1** Local planning authorities have a statutory duty to take action on climate change and this needs to be addressed in the new Local Plan. Climate change risks are expected to intensify in London in the future to include flooding, higher and unseasonal temperatures, urban heat island effect and limited water resources.
- 10.2** CO2 emissions from domestic and road transport sectors are higher in Lewisham than the London and UK averages. Therefore the location of new development in areas with good public transport accessibility and the promotion of cycling and walking will be essential.
- 10.3** The NPPF identifies the key role planning has in the reduction of greenhouse gas emissions, providing resilience to impacts of climate change and supporting the delivery of renewable energy and local carbon development. The Government's zero carbon policy had aimed to ensure that all new homes are zero carbon by 2016 and 2019 for new non-domestic buildings. However the Government announced as part of its productivity plan "Fixing the Foundations"<sup>(23)</sup> that it does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards.
- 10.4** The current policies in the Core Strategy (2011) and Development Management Local Plan (2014) are supported by the Renewable Evidence Base Study (2010). It justified the adoption of the Code for Sustainable Homes (CSH) Level 4 for residential development and Building Research Establishment Environment Assessment Method (BREEAM) Very Good Standard for non residential development. This study also demonstrated that the establishment of a decentralised energy networks in Deptford and New Cross and at Lewisham and Catford town centres, without the use of South East London Combined Heat and Power plant, is feasible and commercially viable.
- 10.5** Up until now, the Code for Sustainable Homes<sup>(24)</sup> had allowed councils to adopt their own sustainability levels as a planning requirement for new residential development. However as part of the Government's Housing Standards Review this is now being phased out and elements of the code will now be incorporated into building regulations. These will be known as "the new national technical standards." So in the future new residential development will need to comply with building regulations on energy and water efficiency. The new Local Plan will need to opt-in to these national technical standards.
- 10.6** The Local Plan will need to ensure that growth and development in the Borough is carried out in a sustainable way. Developments will need to reduce the impacts of climate change by maximising the energy efficiency of new and existing buildings, increasing the use and supply of renewable energy and encourage the establishment of decentralised energy networks. New development will also need to incorporate design measures to manage heat gain and deliver cooling in buildings, water efficiency and urban greening.

23 Fixing the Foundations: Creating a More Prosperous Nation (HM Treasury, July 2015)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/443898/Productivity\\_Plan\\_web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/443898/Productivity_Plan_web.pdf)

24 Code for Sustainable Homes is an environmental assessment method for rating and certifying the performance of new homes

## The Natural Environment

**10.7** Lewisham has an extensive and varied network of open space and parks. Significant areas of the borough are identified as Metropolitan Open Land, notably Blackheath and Beckenham Place Park. These open spaces contribute to the attractiveness of the borough, the health and well-being of its residents. They also support a wealth of wildlife and biodiversity which is important for flood protection, improving air and water quality.

**10.8** Lewisham's open spaces and environmental assets also provide opportunities for health, leisure and recreational activities including South East London Green Chain Walk, the Green Grid, Waterlink Way, the Thames Path and river and waterways network.

**10.9** Due to a limited land supply and increasing development pressures, the opportunities to create new additional open space is limited. So the new Local Plan will continue to protect and enhance Lewisham's existing open spaces and biodiversity, recognising their importance and the multiple benefits they provide.

**10.10** Although Lewisham is one of the greenest parts of inner south-east London, there are areas of open space deficiency within wards of Brockley, Catford South, Lee Green, Perry Vale and Telegraph Hill. Improving accessibility to existing green spaces by creating better connectivity to and from these spaces is therefore needed to help address this issue.

**10.11** The borough contains a number of waterways including the river Thames, Deptford Creek and the Ravensbourne River network (its tributaries the Pool, Quaggy and Spring Brook). These waterways contribute towards recreation and well being and to the borough's amenity value. The new local Plan will continue to ensure that Lewisham's rivers are protected and restored and that their roles as heritage assets are enhanced.

**10.12** Some parts of the borough fall within an area of flood risk however most of the borough is protected by flood defences, including the Thames Barrier. Properties and infrastructure are also at risk of flooding from other sources such a groundwater flooding and surface water flooding.

**10.13** The Local Plan will need to ensure that the risk of flooding is considered in the location and design of new development in order to minimise the impact on people and the environment. Opportunities for development to re-naturalise the borough's waterways should be maximised as this provides a natural buffer around watercourses, maintains the character of rivers and supports local wildlife. River restoration provides an opportunity to increase public access to the rivers by establishing or connecting up riverside walkways and cyclepaths.

**Picture 10.1** Lewisham's Natural Environment



## Waste

- 10.14** Every London borough is allocated an apportionment of waste in the London Plan that they must dispose of using appropriate facilities. For Lewisham this equates to 143,000 tonnes in 2016, increasing to 206,000 tonnes by 2036. This includes municipal, commercial and industrial waste, and a proportion of waste from central London boroughs as they have limited or no land available for waste management.
- 10.15** The South East London Joint Waste Technical Paper (2013) SE London Waste Technical Paper (2013) <sup>(25)</sup> was prepared with five other boroughs and sets out how the boroughs will meet the waste apportionment targets set by the London Plan. The provision of waste management sites in this borough exceeds the London Plan apportionment with the South East London Combined Heat and Power Station (SELCHP) in Deptford being able to accommodate in excess of 488,000 tonnes. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in south-east London.
- 10.16** The Site Allocations Local Plan (2013) safeguarded three waste sites in the borough, all of which are contained within the Surrey Canal Strategic Industrial Location and they are:
- South East London Combined Heat and Power (SELCHP) plant,
  - Hinkcroft Transport Ltd recycling centre, and
  - Landmann Way recycling centre
- 10.17** The Lewisham Local Plan will continue to safeguard these sites for waste management. It will also continue to seek a decrease in the amount of waste generated in on-site construction and demolition waste and increasing recycling and composting. Encouraging behavioural change to ensure waste generation is reduced will also be an integral part of this process.
- 10.18** The consideration of waste handling is another important issue and the design of new development needs to take into account the size and location of waste and recycling stores. Bin storage areas need to be appropriately designed and must not impact upon the street scene or cause a nuisance to neighbouring properties. It is important that the volumes and types of waste which will be produced by a new development when fully occupied are properly estimated so that the bin type for the proposed development can be determined. Accessibility and the location of the bin store area are also key design considerations as there needs to be access for the waste collection crew to collect the waste containers as well as access for large collection vehicles and in some cases there needs to be a turning space for the waste collection vehicle.
- 10.19** In the future, new developments will need to factor in the changes taking place in the waste industry. The Council are looking at introducing new food, garden and changing refuse collection services. Therefore the design of new developments will need to ensure that they are designed to accommodate these changes, such as including space to house new waste receptacles for food and garden waste.

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25 SE London Waste Technical Paper (2013)  
[www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base](http://www.lewisham.gov.uk/myservices/planning/policy/LDF/evidence-base)

## Air Quality

- 10.20** The Council's Air Quality Action Plan identified that road traffic is the main source of air pollution in the borough, mostly in roads with a high flow of buses and/or HGVs, junctions and bus or coach stations. In 2001, Lewisham adopted five air quality management areas.
- 10.21** Air pollutants at high concentrations can impact upon health so there are considerable health benefits related to the improvement of air quality through the reduction of air pollution in the borough.
- 10.22** Addressing and improving local air quality will also influence some of the issues that contribute towards climate change. The Local Plan will continue to protect air quality in Lewisham, by only granting planning permission for major developments that have considered air quality through an air quality impact assessment. Planning permission will not be granted where air quality impacts can not be successfully mitigated against.

## Water Quality

- 10.23** Water must meet minimal levels of quality to ensure it does not adversely effect human health, vegetation or other sensitive receptors. It is therefore necessary that when a private supply is to be included in a development that they are appropriately tested, monitored, protected and treated as required.
- 10.24** The new Local Plan will need to ensure that where a private supply or distribution system is proposed as part of a development, the quality of water is assessed so that any required treatment is identified and an on-going monitoring and maintenance plan is established.

## Contaminated Land

- 10.25** In line with legislation and national and regional planning policy, the planning system must deal with contaminated land. Contaminated land can occur as a result of industry, waste disposal, chemical and oil spills. Any land known or suspected of being contaminated must be dealt with before development commences. When considering the development of such sites the Council will consider the risk of pollution arising from contamination and the impact on human health, property and the wider environment.

## Noise and Light Pollution

- 10.26** Excessive noise can have a detrimental impact on health and on natural habitats. The Local Plan will continue to require that noise and vibration generating development are located in the Strategic Industrial Locations. Whilst new noise sensitive developments will not be allowed to locate near existing noise pollution unless no alternative location is available then appropriate mitigation measures will be sought.
- 10.27** Light pollution can have a detrimental impact on wildlife, local character, residential amenity and views of the night sky. The Council recognises the value of tranquil and quiet areas and will seek to protect and enhance them for the benefit of the local community and biodiversity. The Lewisham Local Plan will continue to seek that new lighting is properly design and installed. The use of energy efficient and solar powered lighting will also be encouraged.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

- 11.1** The new Local Plan will include policies that will help to create high quality new buildings and ensure that these relate well to their context and succeed in creating a sense of place and local distinctiveness. This includes sensitive and high quality design and layout, the creation of a visually interesting and coherent townscape and streetscape, design that acts to reduce the opportunity for and fear of crime, and the creation and preservation of residential amenity. The preservation or enhancement of conservation areas and listed buildings and other 'heritage assets' will also be a major concern of the new Plan and how an understanding of this historic context also contributes to the overall urban quality and attractiveness of the borough.
- 11.2** In order to ensure that development meets these aims extensive evidence has been prepared on the character of the built and landscape environment of the borough as a whole. The Lewisham Borough wide Character Study (2010) examines and classifies the various forms of built development in Lewisham and makes recommendations on the key issues and pressures that might affect the unique character of these areas. The study highlights the difference between the more urban character of the north of the borough compared to the predominantly residential character of the south of the borough. The study recognises the character and quality of many residential areas that do not have conservation area status. These areas include various types and styles of terraced housing, larger 'villa' style housing, and more modern development styles and street layouts. The Council will consider proposing that certain parts of these areas should be adopted as 'Areas of Special Local Character' in order to protect their quality.
- 11.3** The Tall Buildings Study, updated in 2012, examines the impact of potential tall buildings on Lewisham and Catford Town Centres, and the major development sites in the Deptford and New Cross area. This includes the potential impact of tall buildings on local residential amenity and heritage assets. This document will require extensive updating as part of the preparation of the new Local Plan.
- 11.4** These studies provide the background information which supports the policies in the Core Strategy and the Development Management Local Plan on the design of the built environment and heritage assets, and which cover the design factors listed above.
- 11.5** The Planning Service also prepares Supplementary Planning Documents (SPD) which interpret and provide further guidance on policies in the borough's Local Plan. These documents can be subject based, for example guidance on shop front design, alterations and extensions to buildings, residential standards, or area based providing detailed guidance on the urban design of a specific location.
- 11.6** Buildings and areas of historic and architectural importance are described as 'heritage assets' in NPPG. Heritage assets include conservation areas, listed buildings, archaeological remains, registered historic parks and gardens, and locally listed buildings. The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides the statutory basis for the Council's approach to preserving or enhancing these assets.
- 11.7** The Planning Service undertakes a continuous programme of reviewing and identifying conservation areas, and of recommending important and interesting buildings for statutory local listing. Appraisals of many of the Conservation Areas in the borough have recently been prepared which are used to guide decisions on development proposals. In order to protect features identified as being important to preserve or enhance the character of conservation area, Article 4 directions may be made which restrict the rights of property owners to alter buildings in ways that might harm their historic character. The features that

are protected include for example retaining the design of traditional timber windows, fencing and other boundary treatments but can include many other elements that contribute to the historic character and quality of an area. The designation of conservation areas and the listing of buildings occurs independently of the Development Plan process. The Planning Service also has an on-going programme of 'locally listing' buildings and structures, such as parish boundary markers and horse troughs to suburban villas, churches and schools. A local listing does not have the status of a statutory listing but it does ensure that the significance of heritage assets is taken into account when a planning decision on a development is made.

- 11.8** The Council will be updating many of the evidence base documents during the preparation of the new Local Plan, and considers that these will be vital in placing high quality design and heritage assets at the centre of regeneration objectives. A high quality environment will attract business investment, (important in a borough with a small economy), create sustainable development, preserve a sense of place and history and reinforce civic pride.

### The Challenge of New High Density Development

- 11.9** The provision of increased housing in larger or taller buildings could impact on the borough's character areas and heritage assets. As discussed elsewhere in this consultation document, new increased housing targets for the borough will need to take advantage of what sites are available and build at a higher density than previously thought desirable or possible, particularly in the Regeneration and Growth Areas identified in the Core Strategy. This presents a challenge to architects and designers to achieve high quality environments and places where people want to live. The highest quality design, and a high quality public realm will be critical to the success of these developments. The Core Strategy sets out a framework for the location of this growth by setting out a number of spatial regeneration areas and the amount of growth and development expected for them.

### Urban Design and Conservation in Regeneration and Growth Areas

- 11.10** The Regeneration and Growth Areas are focused on Lewisham Town Centre, Catford Town Centre, Deptford, including Deptford Creekside and New Cross/New Cross Gate. The majority of the borough's new housing, retail and employment uses will be focused in these areas. These regeneration areas also have significant heritage assets, notably conservation areas in Lewisham, Deptford and in New Cross and New Cross Gate Town Centres and important listed buildings and structures. Extensive new development has already taken place in Deptford and Lewisham Town Centres, and the development sites near New Cross Gate station are currently being developed. The other large scale high density development in this area will take place on larger former industrial sites with few if any heritage assets and a lack of established character. Much of the current development comprises inward looking estates of social housing that are poorly connected and lack facilities. The developments are expected to bring life, new economic activity and vitality to these areas of the borough.
- 11.11** An example of this new development will be at Surrey Canal Road which will provide high density housing, leisure facilities and a large church. The development has an emphasis on sport, building on its location at the Millwall Football Ground. The new development of 3,500 flats at Convoys Wharf has a Scheduled Ancient Monument on site, a number of listed buildings, including the Olympia Warehouse which is more or less placed centrally on the site, and other heritage assets which will be central to the new development in providing a sense of place and continuity with the past. These assets will need to be protected, enhanced and accommodated. Developments at Marine Wharf in the north-west corner of the borough

are currently on the way to completion, and a development at a large poor quality industrial site at Oxestalls Road is in the pipeline. Both of these developments take account of the local context and history, creating a sense of place. The developments will include the construction of a landscape feature that follows the line of the former Surrey Canal which was in-filled in the 1970s.

- 11.12** Catford town centre will face development pressures to increase the intensity of development if the proposals to extend the Bakerloo Underground Line start to become more definite. The line would travel in the borough from New Cross Gate to Lewisham underground and then use the existing network rail tracks through to Lower Sydenham station and beyond to the London Borough of Bromley. Catford has a distinctive character with important listed buildings at its core; Broadway Theatre and Town Hall Chambers and a number of locally listed buildings, and is surrounded by attractive low rise Victorian/Edwardian terraced housing in traditional streets, some of which has Conservation Area status.

### Urban Design and Conservation in District Hubs

- 11.13** Some intensification of development is expected in some of the borough's District Shopping Centres. This spatial strategy area applies to Blackheath, Forest Hill, Lee Green and Sydenham. This could refer to extra retail or residential development. In practice opportunities for development are very limited in Blackheath and Sydenham. Blackheath forms a coherent compact village centre where extra development could not be accommodated without altering in some fundamental way the established character and quality of the village. Sydenham has a coherent linear form, but has a small number of sites towards the eastern end of the shopping area where development could be accommodated. Both town centre areas have Conservation Area status.
- 11.14** Forest Hill Town Centre is also a Conservation Area, but it is recognised that some of the street frontage, particularly at Forest Hill Station, needs improvement and enhancement. There are also a number of small development sites at the station. Forest Hill's characteristics as a Victorian shopping area could be enhanced by the new development, although realistic proposals have yet to emerge. These issues were discussed in the Forest Hill Urban Design Framework SPD prepared by the Council, and have recently been under discussion by the Forest Hill Society.
- 11.15** The purpose built shopping centre at Lee Green was constructed in the 1960s. It has a high vacancy rate and does not provide an attractive shopping environment. It is expected that the entire purpose built shopping area will be redeveloped, but is not expected to impact in any significant way on any local heritage assets.

### Urban Design and Conservation in Local Hubs

- 11.16** Three smaller centres were identified in the Core Strategy which had clusters of sites available for development at Brockley Cross, Hither Green, and Bell Green. Much of this redevelopment has already occurred.

### Urban Design and Conservation in the Areas of Stability and Managed Change

- 11.17** The majority of the borough's conservation areas are located within this area which covers the residential and suburban areas. Development is expected to be small scale and infill and restricted by its largely built up character and lack of availability of large sites. The area also

has many protected parks and open spaces which are preserved against development, and which are an essential element making these areas attractive and liveable and contribute to their essential character.

**11.18** The Council will continue to protect the Conservation Areas already designated and is actively considering new ones. However, in recognition of the fact that the Lewisham Borough Wide Character Study has identified certain residential areas as having important features that could be protected but which might not meet the criteria for conservation area designation, the Council will be proposing that certain areas should be adopted as ‘Areas of Special Local Character’. An example of this could be the 1920s Bellingham Estate in the south of the borough which was designed as a garden city, and which faces unsympathetic alterations to this through opportunistic infill development which would disrupt the regularity of the development form. Other areas will also be considered for this designation.

**Picture 11.1 Telegraph Hil Conservation Area**



**11.19** Groups within the community are also actively preparing Neighbourhood Plans which will also be examining urban design issues and ways that local heritage assets can be enhanced and integrated into their neighbourhoods to increase a sense of place and historical continuity. Examples are the Corbett Estate Neighbourhood Forum, and the Grove Park Neighbourhood Forum.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

- 12.1** Sustainable communities can only exist where a network of appropriately located facilities are provided within a local area. These facilities include: education, healthcare, leisure, arts, cultural, entertainment, sports and recreational facilities, emergency services, places of worship and cemeteries.
- 12.2** The current policies in the Core Strategy and Development Management Local Plan seek to protect and enhance community facilities, art, culture and entertainment uses. The loss of facilities is allowed only when there is no demand for it. The new Local Plan will be produced against the background of severe cuts to local government and all services will have to be reassessed against the new financial reality.
- 12.3** The Council has commissioned an update to its Infrastructure Delivery Plan (IDP). This evidence base document will provide an understanding of the infrastructure issues that the borough faces. The IDP will be prepared in consultation with those responsible for delivering infrastructure throughout the borough. The IDP will be accompanied by an infrastructure schedule identifying the infrastructure needs and costs (including where possible phasing of development), funding sources and responsibilities for delivery. This means delivery is often beyond the influence of the planning system itself.

## Education

- 12.4** The Council has a legal duty to ensure there are enough school places for all children who live in the borough. Lewisham is already experiencing significant school age population growth and this will continue. There will be a very significant increase in demand for additional school places in the opportunity areas where the majority of housing growth is anticipated to take place. These areas are already under severe pressure to provide sufficient primary and other school places and in the near future secondary and special school places. It is anticipated that increased educational provision will be needed outside the growth area in the borough in response to a continued high birth rate and higher occupancy rates of rental stock across the borough.
- 12.5** Demand for primary school places will at least remain high and may continue to increase in the future. It is estimated that beyond the currently planned new provision, a new primary school and a new special school will be required as early as 2021.
- 12.6** By 2019 it is forecast that, without new provision, there will be a shortage of secondary school places in the borough. Neighbouring authorities Greenwich, Southwark and Bromley have planned for enlargements which may alleviate pressures to the end of the decade. However, it is estimated that Lewisham will have a need for up to 3 new secondary schools within the period of the plan, the earliest by 2019. The number dependant upon taking into account future provision in neighbouring boroughs.
- 12.7** Providing sufficient high quality places for under 5s, for children and young people of primary and secondary age including those who need special educational provision, for Further Education and Higher Education provision to support the borough's growing population will be very challenging. This is because there is an extreme shortage of sites either for further expansion of existing schools, or for new schools, as almost all of Lewisham's schools have already been permanently or partially expanded over the last seven years.
- 12.8** The following sites are safeguarded in the Sites Allocation Local Plan (2013):

- Prendergast Vale College (SA16) in Elmira Street, for a new through-school under the Building Schools Future Programme (BSF). This site has been redeveloped and is now a college.
- Deptford Green Secondary School Site (SA17) in Amersham Vale, is safeguarded for the redeveloped Amersham Vale/upper school site for new public open space (39%) and residential development.

**12.9** Most of the borough falls within the areas of managed change, which is where most of the borough's conservation areas are located. Therefore a more innovative approach to design will be needed in order to achieve a balance between protecting the character of an area and delivering school expansion. Higher density buildings are another option to consider for delivery of educational facilities in the borough. High quality but affordable design will be fundamental to the success of these developments.

**12.10** The Lewisham Local Plan will need to ensure that there is sufficient capacity to meet the need for school places and ensure that this capacity is located in the right places. The Planning Service will need to work in partnership with the Council's Education Service to identify the need for new school places. The new Local Plan will need to consider how this demand will be met whether it is by allocating land for new school provision or safeguarding land for schools extensions through a more general policy promoting new schools and school expansion. Delivering mixed use developments that consist of educational and other infrastructure facilities alongside housing will be essential to support growth in the borough.

### Health and Wellbeing

**12.11** Although there have been improvements in health, Lewisham experiences worse health outcomes than London and England. The Joint Strategic Needs Assessment (JSNA) assesses the health needs of a local population in order to inform policies and services that will improve the health and wellbeing of individuals and communities.<sup>(26)</sup> It provides information on the health and social care needs of Lewisham's citizens, complemented by information on the social, environmental and population trends that are likely to impact on people's health and well-being.

**12.12** The NPPF requires local planning authorities to work with public health leads and health organisations to understand and take account of the health status and needs of the local population providing accessible local services that reflect its communities needs and supports health, social and cultural wellbeing.<sup>(27)</sup> The expected growth in population means that there will be increasing demand for healthcare in the borough. The Council will support and work in partnership with health organisations in the provision of healthcare.

**12.13** The Health and Social Care Act 2012 has led to significant changes in adult social care. Under this act, local authorities have a statutory duty to use their powers and resources across all sectors to improve the health of their population. The NPPF also emphasises the role that the planning system can play in facilitating social interaction and creating healthy, inclusive communities.<sup>(28)</sup> There are a whole range of planning policies that have both a direct and indirect influence on the health and wellbeing of residents and contribute towards the creation of a healthy environment. The design of new buildings can contribute towards

26 Lewisham's Joint Strategic Needs Assessment <http://www.lewishamjsna.org.uk/>

27 Paragraph 171, NPPF

28 Paragraph 69, NPPF

improving health and promoting healthy lifestyles such as the provision of outdoor spaces and terraces adjacent to buildings to encourage mental wellbeing, activity and produce and provide healthy food.

- 12.14** Transport has an important role in people's health. Transport provides access to jobs, shops, education, health and social services. Improving the transport systems to encourage more people to walk and cycle will have an impact on the health and fitness levels of residents in Lewisham.

Please provide your comments by completing the online questionnaire on the Lewisham consultation portal.

- 13.1** The council is committed to reporting back on responses to the consultation. Following each stage of public consultation the Council will:
- Give full consideration to all representations received and engage in further discussions where this will assist in developing the document.
  - Make a summary of all responses available on our website.
  - Produce a consultation report, detailing the comments we have received and explaining how we have dealt with comments and how they have affected the development of policy, at each stage of the Local Plan process.
  - Consultation reports will be made available to view on the Council’s website, and paper copies will be made available at Laurence House and at town centre libraries.
- 13.2** The Council will review the responses to this consultation and will use them to inform the Preferred Options. The Preferred Options will be published for public consultation in early 2016. Following this, the Preferred Options will be amended and a ‘Publication Plan’ will be prepared and consulted upon in early 2017.
- 13.3** All respondents will be notified of the submission of the plan to the Secretary of State for examination and will be notified of the examination hearings. A consultation report will be submitted to the Secretary of State showing how the Regulations and the aims of the Statement of Community Involvement have been met and describing how the plan has been influenced by consultation.
- 13.4** The Local Plan is expected to be adopted in late 2017 and the Council will revoke the existing Core strategy, Development Management Local Plan, Site Allocations Local Plan and Lewisham Town Centre Local Plan.



## Introduction

The London Plan classifies town centres according to their existing role and function. The London hierarchy consists of: International centres which are London's globally renowned retail destinations such as Knightsbridge. Metropolitan centres which serve wide catchments and typically contain at least 100,000 sq.m. of retail, leisure and service floorspace. Major centres which generally contain over 50,000 sq.m. of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. District centres provide convenience goods and services for more local communities and are accessible by public transport. Typically they contain 10,000 – 50,000 sq.m. of retail, leisure and service floorspace. Neighbourhood and local centres typically serve a local catchment often most accessible by walking and cycling and include local parades and small cluster of shops.

## Lewisham

The role & function of Lewisham Town Centre is as the borough's premier shopping destination. It is classified as a Major centre in the London hierarchy of shopping centres. It has by far the widest choice of comparison and convenience floorspace. It attracts customers from a wide catchment area. If the Council's ambitions to make the centre a metropolitan centre in the London hierarchy are to be achieved it will be necessary to increase considerably both the quality and quantity of its retail offer. However, in terms of vacant property the centre is doing very well, the 2014 survey showed a vacancy rate of only 4.1%.

## Catford

Catford Town Centre is the second largest centre in the borough. It is classified as a Major centre in the London hierarchy of shopping centres. It provides a wide range of services to borough residents and a more local convenience and comparison shopping offer. It performs important functions as a civic and entertainment centre attracting visitors across the borough and beyond. However there has been no notable change in the retail offer of the Town Centre in recent years. It is important that the Centre improves its retail offer in the future if it is to maintain its position in the retail hierarchy and new investment should be encouraged. The 2014 retail survey showed a vacancy rate of 7.5% for Catford.

## Blackheath

Blackheath is the seventh largest of the nine major and district town centres. It can be said to have a dual role and function in that it clearly serves a local function for convenience goods and to some extent for services and comparison goods. However, the quality of the services and comparison offer is such that visitors are attracted from a wider catchment area than might be expected for a centre of this size. It plays an active role in the 'night time' economy of the borough. The 2014 retail survey showed a vacancy rate of 0% for Blackheath.

## Deptford

Deptford is the third largest town centre in Lewisham. Its role and function is essentially as a local shopping destination. There are virtually no 'high street' names represented in the centre while the convenience sector is more than twice the national average and is dominated by independent traders serving a local market. Many of the local shops specialize in 'ethnic' goods which serve the immediate population. The centre is dominated by a street market which operates 3 days a week. However, Deptford's strength is in the number and variety of independent traders. The 2014 retail survey showed a vacancy rate of 7.1% for Deptford.

### **Downham**

Downham is the smallest of the district town centres. Its role and function is as a local shopping centre, serving the needs of the local community. Given its location between Catford and Bromley the general nature of the centre is not surprising, with most of the shops being service and convenience oriented. However, the centre has recorded very low vacancy rates over many years and this indicates that it is a successful local shopping centre. The 2014 retail survey showed a vacancy rate of 5.3% for Downham.

### **Forest Hill**

Forest Hill is the sixth largest of the nine major and district centres. Its role and function is as a local centre catering for the immediate population needs. This is illustrated by the small comparison goods offer and the high proportion of service uses. It contains a limited number of 'high street' names and they are not located in the best type of property. The dominance of the busy roads, South Circular A205 and Dartmouth Road A2216, creates a difficult pedestrian environment. The 2014 retail survey showed a vacancy rate of 11.8% for Forest Hill.

### **Lee Green**

Lee Green is the eighth largest of the nine major and district town centres. Its role and function is as a local centre catering for the needs of the immediate population. The majority of floorspace is in convenience stores the largest being Sainsbury. In addition there are a range of service uses and a significant amount of office space within the town centre. The borough boundary runs through Lee Green and the town centre is shared with the London Borough of Greenwich. The centre has been in relative decline for a number of years and current planning policy recommends comprehensive redevelopment. The 2014 retail survey showed a vacancy rate of 13.5% for Lee Green, this was the highest of all the major and district centres.

### **New Cross**

New Cross is the fifth largest of the nine town centres in Lewisham. Its role and function is as a local centre which provides for the needs of local people and particularly students from Goldsmiths College. It has a relatively poor environment created by the linear nature along the very busy A2 road. The very high level of service uses is also influenced by the presence of the student population. The Sainsbury store at the western end of the centre is likely to have a wider draw. The 2014 retail survey showed a vacancy rate of 9.4% for New Cross.

### **Sydenham**

Sydenham is the fourth largest of the nine town centres. Its role and function is as a local centre providing for the day to day needs of the local population. The higher than average convenience floorspace and the lower than average comparison offer indicate this essentially local function. There are also relatively few 'national name' retailers represented in Sydenham. The 2014 retail survey showed a vacancy rate of 9.4% for Sydenham.

The predicted age-based population increases are set out in Table 2. Table 2 highlights a predicted significant ageing of Lewisham's population, including a 53% increase in people aged 65 plus and a 40% increase in the number of people aged 80 plus.

**Table 2.1 Age Population Projections** <sup>(29)</sup>

Age group	2015	2022	2027	2032	% change 2015- 2032
0 to 4	22,870	22,433	22,096	21,699	-5.1
<b>5 to 9</b>	20,066	20,454	20,291	19,918	-0.7
<b>10 – 14</b>	14,957	19,012	18,666	18,464	23.4
<b>15 - 19</b>	15,149	15,740	18,205	17,851	17.8
<b>20 - 24</b>	20,443	18,552	19,157	21,054	3.0
<b>25 - 29</b>	28,296	27,170	25,804	26,271	-7.2
<b>30 - 34</b>	30,621	31,613	30,375	28,930	-5.5
<b>35 - 39</b>	27,521	29,594	30,284	29,062	5.6
<b>40 -44</b>	22,766	26,403	26,993	27,498	20.8
<b>45 - 49</b>	20,458	21,306	23,938	24,384	19.2
<b>50 -54</b>	18,930	19,218	19,693	21,935	15.9
<b>55 - 59</b>	14,306	18,180	17,942	18,258	27.6
<b>60 -64</b>	10,076	14,007	16,124	15,924	58.0
<b>65 - 69</b>	8,508	9,628	12,163	13,992	64.5
<b>70 - 74</b>	6,151	7,369	8,367	10,556	71.6
<b>75 - 79</b>	5,324	5,723	6,285	7,166	34.6
<b>80 - 84</b>	3,863	4,062	4,624	5,118	32.5
<b>85 - 89</b>	2,452	2,702	2,865	3,349	36.6
<b>90 + over</b>	1,237	1,529	1,834	2,101	69.8
<b>Total</b>	294,009	314,701	325,716	333,554	13.5

**Table 3.1 Maximum parking standards**

<b>Number of beds</b>	<b>4 or more</b>	<b>3</b>	<b>1-2</b>
	2-1.5 per unit	1.5-1 per unit	Less than 1 per unit

**Notes:**

All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit.

Adequate parking spaces for disabled people must be provided, preferably on-site.

20% of all spaces must be for electric vehicles with an additional 20% passive provision for electric vehicles in the future.

**Affordable housing**

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by market housing. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers, (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Community Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.

Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

**Air Quality Impact Assessment (AQIA)**

A technique for determining the relative contribution to ground level pollutant concentrations as a result of existing and/or future emission sources. The AQIA report enables the planning authority to determine, with a reasonable degree of certainty, the significance of any air quality impacts, and thereby the priority to be given to air quality concerns when deciding an application. The scope of an air quality assessment will depend on the nature of the proposed development and the potential impact, but is likely to include: the existing air quality in the study area (baseline) predicted future air quality without the development (future baseline) predicted future air quality with the development (with development) assessment of the impact of the construction / demolition phase consideration of the cumulative impact of permitted developments within the area.

**Air Quality Management Area (AQMA)**

Local planning authorities are required to review and assess the air quality in their area (see definition of AQIA above). If a local authority finds any places where the objectives are not likely to be achieved, it must declare an Air Quality Management Area there.

**Amenity Areas**

Communal amenity areas attached to residential development, such as, private communal gardens for small blocks of flats, landscaped spaces around taller blocks of flats and around low and medium size slab blocks.

**Article 4 Direction**

A legal instrument which extinguishes specific 'permitted development rights' from buildings within a defined area i.e. the right to do some types of minor works without planning permission. The effect of an article 4 direction is to require planning permission to be obtained from the Council before such work begins. Flats and commercial premises do not have permitted development rights so article 4 directions do not apply to them.

**Back gardens**

Private amenity areas that were the entire back garden of a dwelling or dwellings as originally designed. Gardens used to be considered previously developed land (PDL) with a presumption in favour of development. Gardens are no longer considered to be PDL which means that there is no longer a presumption in favour of development.

**Backland sites**

'Landlocked' sites to the rear of street frontages not historically in garden use such as builders yards, small workshops and warehouses, and garages.

**Biodiversity**

Biodiversity is the variety of life, which includes mammals, birds, fish, reptiles, amphibians, invertebrates, fungi and plants and the woodlands, grasslands, rivers and seas on which they all depend including the underlying geology.

**Building Research Establishment Environmental Assessment Method (BREEAM)**

A national environmental assessment and rating system for buildings. It was the most widely used environmental standard in the UK, used to assess those buildings and extensions to buildings that are not rated by the Code for Sustainable Homes.

**Code for Sustainable Homes**

This used to be a national standard for sustainable design and construction of new homes. The Code measured the sustainability of a new home against categories of sustainable design, using a 1 to 6 rating system to communicate the overall sustainability performance of a new home.

**Community Infrastructure Levy (CIL)**

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to pay for infrastructure projects identified by the Local Authority and/or the Mayor of London.

**Comparison Retailing**

The provision of items not obtained on a frequent basis such as clothing, footwear, household and recreational goods.

**Conservation**

The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its' significance.

**Conservation Area**

Areas of special architectural or historic interest designated by local authorities under the Planning (Listed Building and Conservation Areas) Act 1990.

**Contribution**

Land, services, facilities and/or money given by developers of land to the local authority following negotiations, to ensure that the needs of new communities generated by the development are catered for.

**Convenience Retailing**

Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.

**Core Strategy**

A Local Plan setting out the spatial vision and strategic objectives of the planning framework for the area, in line with the Sustainable Community Strategy.

**Designated Heritage Asset**

A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

**Development**

"The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material changes in the use of any building or other land." (Town and Country Planning Act (1990) Part III Section 55).

**Development Plan Document (DPD)**

A Local Plan that has been drawn up by the local planning authority in consultation with the community, has been subject to independent testing and has the weight of development plan status. The terminology 'Development Plan Document' has been replaced with 'Local Plan' for new documents, but remains for pre-existing documents (i.e. Lewisham Core Strategy DPD, 2011).

**District Centre**

A town centre that provides convenience goods and services to local communities and is accessible by public transport, walking and cycling. District centres typically contain 10,000-50,000 square metres of retail floorspace. In the London Borough of Lewisham these are Blackheath, Deptford, Downham, Forest Hill, Lee Green, Sydenham and New Cross and New Cross Gate.

**Duty to Co-operate**

The duty to cooperate was created in the Localism Act 2011 <sup>(30)</sup>, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

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30 <http://www.legislation.gov.uk/ukpga/2011/20/section/110/enacted>

The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination. Local planning authorities must demonstrate how they have complied with the duty at the independent examination of their Local Plans.

### **Edge of Centre**

For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

### **Evidence Base**

The data and information about the current state of Lewisham used to inform the preparation of Local Plan documents. Flood Risk Assessment An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

### **General Permitted Development Order (GPDO)**

A number of forms of telecommunications development which are permitted under the General Permitted Development Order are subject to a 56 day prior approval procedure. For such types of development the developer must apply to the local planning authority for its determination as to whether prior approval will be required for the siting and appearance of the proposed development.

### **Gypsy and Travellers**

Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependant's educational or health needs or old age have ceased to travel temporarily or permanently, but excluding members of an organised group of travelling show people or circus people or circus people travelling together as such (Planning policy for traveller sites, March 2012).

### **Housing Need**

A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy. Independent Examination The process by which a planning inspector may publicly examine a Local Plan before issuing a report with recommendations that should be made prior to adoption of the Local Plan.

### **Infill Development**

Development that generally takes place on sites within street frontages such as former builders yards, small workshops and garages, gaps in terraces and gardens to the side of houses. Infrastructure The utilities, transport and other communication facilities and community facilities required to support housing, industrial and commercial activity, schools, shopping centres and other community and public transport services.

**Listed Building**

Buildings of special architectural or historic interest designated by the Department of Culture, Media and Sport under the Planning (Listed Building and Conservation Areas) Act 1990.

**Local Development Document (LDD)**

Sits within the LDF portfolio and comprises Development Plan Documents (DPDs), also called Local Plans that have been subject to independent testing and have the weight of development plan status, and Supplementary Planning Documents (SPDs) which are not subject to independent testing and do not have development plan status.

**Local Development Framework (LDF)**

The Local Development Framework is a portfolio, or a 'folder', of Local Development Documents which will provide the local planning authority's policies for meeting the community's economic, environmental and social aims for the future of their area where this affects the development and use of land.

**Local Development Scheme(LDS)**

A public statement identifying which Local Development Documents will be produced by the Council and when.

**Local Employment Location (LEL)**

Land that is of local significance and provides goods and services for the local economy, which is used for business use, industrial use, storage and distribution uses, generally being those uses falling within Classes B1, B2 and B8 of the Use Class Order.

**Local Plan**

A Local Development Document that has been drawn up by the local planning authority in consultation with the community, has been subject to independent testing and has the weight of development plan status.

**Local Shopping Parade and Corner Shop**

A local shopping parade is a group of at least four contiguous shops and may continue over breaks such as streets or railways. A corner shop is a shop which is located outside of the Major centres, District centres, Neighbourhood Local centres and Local Shopping Parades. These parades and shops should provide for the day to day needs of local residents.

**Localism Act 2011**

National legislation from central government, partly aimed at improving the planning process and enhancing community involvement in it. Visit [www.communities.gov.uk](http://www.communities.gov.uk) to find out more.

**Major Centre**

A centre that has a borough-wide catchment and typically contains over 50,000 square metres of retail floorspace with a relatively high proportion of comparison goods relative to convenience goods. Major centres may also have significant employment, leisure, service and civic functions. In the London Borough of Lewisham these are Lewisham and Catford town centres.

**Metropolitan Centre**

They serve wide catchment areas covering several boroughs and offer a high level and range of comparison shopping. They typically have over 100,000 square metres of retail floorspace, including multiple retailers and department stores. They also have significant employment, service and leisure functions.

**Metropolitan Open Land (MOL)**

Strategic open land within the urban area that contributes to the structure of London.

**Mixed Use Employment Location (MEL)**

Land currently in industrial use occupied by older and poorer quality industrial uses at low densities which may be incompatible with adjacent residential areas. The sites were considered by the Lewisham Employment Land Study to require redevelopment and have been designated to ensure mixed use development incorporating re-provision of business space to ensure the regeneration of a part of the borough where the environment is poor and levels of deprivation are high.

**Mixed Use Development**

Development for a variety of activities on single sites or across wider areas such as town centres.

**National Planning Policy Framework (NPPF)**

Prepared by the Government to explain statutory provisions and provide guidance to local authorities and others on planning policy and the operation of the planning system. The NPPF explains the relationship between planning policies and other policies which have an important bearing on issues of development and land use. Local authorities must take their contents into account in preparing plans. The guidance may also be relevant to decisions on individual planning applications and appeals.

**National Planning Practice Guidance**

Prepared by the Government, launched in March 2014 to support the NPPF, this is online resource which enables the user to easily link guidance to the relevant NPPF policy, providing planning practice guidance on a wide range of topics.

**Neighbourhood Local Centre**

A centre that serves a localised catchment often most accessible by walking and cycling and typically contains mostly convenience goods and other services. In the London Borough of Lewisham these are Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way. Noise and Vibration Assessment An assessment of noise and vibration that is either existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.

**Open space**

All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity. Out of Centre A location which is not in or on the edge of a centre but not necessarily outside the urban area.

**Planning and Compulsory Purchase Act 2004**

National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it. Visit [www.communities.gov.uk](http://www.communities.gov.uk) to find out more.

**Planning Obligation**

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

**Previously Developed Land**

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

**Primary and secondary frontages**

Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

**Public Transport Accessibility Level (PTAL)**

A standard method used in London to calculate access level of geographical areas to public transport. The result is a grade from 1-6 (including sub-divisions 1a, 1b, 6a and 6b), where a PTAL of 1a indicates extremely poor access to the location by public transport and a PTAL of 6b indicates excellent access by public transport. More parking is generally allowed in areas with a low PTAL i.e. poor public transport and vice versa - and that also relate the allowed density of development to PTAL (i.e. areas with better public transport may have higher density housing or offices).

**Regeneration**

The process of putting new life back into often derelict older urban areas through environmental improvements, comprehensive development and transport proposals.

**Retail Hierarchy**

The role and relationship of retail centres across the borough.

**Section 106 (S106)**

Section 106 of the Town and Country Planning Act 1990 allows a local planning authority (LPA) to enter into a legally binding agreement or planning obligations, with a land developer over a related issue. The obligation is sometimes termed a 'Section 106 agreement'. Such agreements can cover almost any relevant issue and can include sums of money. An example of S106 agreements could be that a developer will build a community meeting place on a development site, or the developer

will make a financial contribution for transport improvements. S106 agreements can act as a main instrument for placing restrictions on developers, often requiring them to minimise the impact on the local community and to carry out tasks which will provide community benefits.

**Sequential Approach/Sequential Test**

A planning principle that seeks to identify, allocate or develop certain types or locations of land before others. For example, brownfield housing sites before greenfield sites, or town centre retail sites before out-of-centre sites.

**Strategic Housing Land Availability Assessment (SHLAA)**

A study aimed at identifying sites with potential for housing, assessing their housing potential and assessing when they are likely to be developed.

**Strategic Housing Market Assessment (SHMA)**

A study aimed at assessing the need and demand for housing within a housing market area.

**Supplementary Planning Document (SPD)**

Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

**Sustainability Appraisal (SA)**

Sustainability Appraisal is a systematic and iterative appraisal process, incorporating the requirements of the European Strategic Environmental Assessment Directive. The purpose of sustainability appraisal is to appraise the social, environmental and economic effects of the strategies and policies in a Local Development Document from the outset of the preparation process.

**Sustainable transport modes**

Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

**Transport assessment**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.

**Transport Statement**

A simplified version of a transport assessment where it is agreed the transport issues arising out of development proposals are limited and a full transport assessment is not required.

**Travel Plan**

A long term management strategy for an organisation or site that seeks to deliver sustainable transport objectives through action and is articulate in a document that is regularly reviewed.

**Use Class Order**

The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'.





Lewisham