

CONSULTATION DRAFT

# LONDON BOROUGH OF LEWISHAM RIVER CORRIDOR IMPROVEMENT PLAN SPD SUSTAINABILITY APPRAISAL



PREPARED BY PRO VISION PLANNING & DESIGN ON BEHALF OF  
THE LONDON BOROUGH OF LEWISHAM

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## Non-technical Summary

This document is the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Equalities Analysis Assessment (EAA) of the Lewisham River Corridor Improvement (RCIP) Supplementary Planning Document (SPD). This report has been produced considering the consultation responses to the Scoping Report of the SA. The Lewisham RCIP SPD is subject to an SA which must, where appropriate, incorporate the requirements of the SEA Directive (2001/42/EC). The SA has been prepared taking into account the Council's obligations in relation to the Equalities Act 2010 and the Council's equalities objectives. The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of development plans.

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

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

The SEA Directive requires that the significant environmental effects of implementing a plan or programme should be monitored to identify effects so that remedial action can be taken if required. Proposals for monitoring are set out within this report.

## 1.0 Introduction

- 1.1 Pro Vision Planning and Design has been instructed by the London Borough of Lewisham to prepare a Sustainability Appraisal (SA) of the Lewisham River Corridor Improvement Plan (RCIP) Supplementary Planning Document (SPD).
- 1.2 This SA seeks to identify the economic, social and environmental impacts of the different options presented in the RCIP SPD. It includes a discussion of the likely significant effects of its implementation and recommendations are made relating to the ways in which potential adverse effects can be reduced or beneficial effects can be enhanced. The report includes proposals for relevant environmental, social and economic indicators to monitor the effects of the implementation of the RCIP SPD.
- 1.3 Sustainability Appraisals must incorporate the requirements of the Strategic Environmental Assessment (SEA) Directive to ensure that the significant environmental effects arising from policies, plans and programmes are identified, assessed, mitigated, communicated to decision makers, monitored and that opportunities for public involvement are provided. The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment.
- 1.4 This Sustainability Appraisal considers the London Borough of Lewisham's obligations in relation to the Equality Act 2010 and the Council's equalities objectives. The assessment has included due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations.
- 1.5 The Scoping Report, the initial stage of the SA process, consisted of the collection of baseline data and information on other plans, policies and programmes that could influence the preparation of the Lewisham RCIP SPD. The data collected was used to identify the key sustainability issues, objectives and targets at multiple spatial scales.
- 1.6 The RCIP SPD is currently in draft form, and ultimately aims to provide guidance for developers and landowners and ensure high quality development along the river corridors that enhances the river setting; as well as providing guidance on flooding and ecological improvements to ensure that development is appropriate and the impacts of development are understood. This is to be achieved by engaging local communities in flood prone areas.
- 1.7 Section 2 of this SA Report provides a detailed description of the methodology for the SA. The context, baseline and objectives of the SA are set out in Section 3. The SA is presented and the significant effects are discussed in Section 4. Measures for mitigation and monitoring are considered in Section 5.

## 2.0 Methodology

### *Sustainability Appraisal*

- 2.1 The purpose of an SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of development plans. The UK Government Sustainable Development Strategy 2005 defines sustainable development as follows:
- Social progress which meets the needs of everyone;
  - Effective protection of the environment;
  - Prudent use of natural resources; and
  - Maintenance of high and stable levels of economic growth and employment.
- 2.2 The SA of the RCIP SPD has ensured that the principles of sustainability are embedded into the plan-making process, forming an integral part of plan preparation. The SA has taken a long-term view, reflecting global, national, regional and local issues. The SA identifies opportunities to enhance positive performance and addresses negative impacts from an early stage in the process of policy formulation. An audit trail of how the plan has been revised to take account of the findings of the SA is provided.
- 2.3 The stages which the SA followed are based on the Government’s Planning Practice Guidance. The Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Assessment of Plans and Programmes Regulations 2004 have also been used to inform the stages followed. These stages are set out in Table 1 below. Stage A of the SA process is covered within the SA Scoping Report. This SA report documents stages B, C and D.

Table 1: Stages of SA

Lewisham River Corridor Improvement Plan Stage 1: Pre-production – Evidence Gathering
SA Stages and Tasks
Stage A: Setting the context and objectives, establishing the baseline and deciding on scope A1: Identifying other relevant policies, plans and programmes, and sustainability objectives A2: Collecting baseline information A3: Identifying sustainability issues and problems A4: Developing the SA framework A5: Consulting on the scope of the SA
Lewisham River Corridor Improvement Plan Stage 2: Production
SA Stages and Tasks
Stage B: Developing and refining options and assessing effects B1: Testing the SPD objectives against the SA objectives B2: Developing the SPD options B3: Predicting the effects of the SPD, including options B4: Evaluating the effects of the SPD, including options B5: Considering ways of mitigating adverse effects and maximising beneficial effects

B6: Proposing measures to monitor the sustainability effects of SPD implementation
Stage C: Preparing the SA Report C1: Preparing the Publication Report SA
Stage D: Consulting on the SPD and SA Report D1: Consulting on the SPD and SA D2: Assessing significant changes and amending the SA
<b>Lewisham River Corridor Improvement Plan Stage 3: Adoption and Monitoring</b>
<b>SA Stages and Tasks</b>
D3: Decision making and providing information, including preparation of a SA adoption statement E1: Developing aims and methods of monitoring E2: Responding to adverse effects

### *SA Approach*

2.4 This section outlines the DCLG SA stages and indicates how the process has been undertaken for the RCIP SPD.

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

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

2.5 The relevant plans, programmes and environmental protection objectives and the significance of these objectives with respect to the RCIP and the SA were discussed in the Scoping Report of the SA, November 2013. These plans, programmes and objectives have been updated in response to comments from statutory consultees and are included in Appendix A.

- A2: Collecting baseline information.

2.6 Baseline information was set out in the Scoping Report produced in November 2013 and has also been provided in Appendix B. The baseline information was used to establish the current state of the area covered by the RCIP SPD, and has informed the identification of economic, environmental and social trends. This information has been used to assess key issues that are evident in the area. The information provides a basis for predicting and monitoring the effects of implementing the SPD.

- A3: Identifying sustainability issues and problems.

2.7 Identifying the sustainability issues and problems provided the opportunity to define the key social, environmental and economic concerns to be taken into account when preparing the RCIP SPD. In some cases these are constraints which must be overcome, or impacts which must be avoided. In other cases these may be opportunities (e.g. improving access to open space and the health of the population). Key sustainability issues were identified through the review of the baseline information set out within the Scoping Report. Table 4 summarises the key issues that the London Borough of Lewisham currently faces in social, economic and environmental sustainability terms.

- A4: Developing the SA framework
- 2.8 The SA framework provides a method for describing, analysing and comparing the sustainability effects of the RCIP SPD. The sustainability objectives that form the SA Framework were developed and consulted on as part of the SA Scoping process taking into account the relationship between the SPD and the objectives of other plans and programmes, along with the findings of the review of baseline information.
- A5: Consulting on the scope of the SA
- 2.9 Views on the content of the SA Scoping Report 2013, including the proposed approach to the appraisal, were taken into account through a formal five week consultation period with the statutory consultees, comprising Natural England, England Heritage, and the Environment Agency.
- 2.10 The SA framework has been updated to reflect the comments from statutory consultees made during the consultation on the scope of the appraisal.

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

- B1: Testing the RCIP SPD objectives against the SA framework
- 2.11 It is imperative that the aims and objectives of the RCIP are in accordance with sustainability principles. DCLG guidance states that the objectives should be tested for compatibility with the SA objectives to assist in refining the RCIP aims and objectives as well as in identifying options/alternatives. The RCIP objectives are tested against the SA framework in the form of a compatibility matrix in Section 4.
- B2: Developing and refining options and assessing effects.
- 2.12 DCLG Guidance states the following 'Only reasonable, realistic and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each. Some alternatives are discrete, involving a choice between one alternative and another. These are often the broad options considered early in plan and programme preparation. Other alternatives can be combined in various ways. Alternatives may be grouped into scenarios, for instance rapid economic growth, most sustainable option, etc.'
- B3: Predicting the effects of the SPD and B4: Evaluating the effects of the SPD.
- 2.13 A series of options and alternatives were produced during the formulation of the RCIP SPD. The significant impacts of the proposed draft of the Lewisham RCIP text have been predicted and evaluated. The nature and scale of the significant impacts has been described. The SA assesses overall whether the contribution that the RCIP makes in relation to each of the sustainability objectives is positive, negative, neutral or uncertain. The following symbols have been used:

Significant positive contribution	√√
Positive contribution	√
Neutral contribution	0
Negative contribution	X
Significant negative contribution	XX
Unknown contribution	?

- 2.14 The SA has been an iterative process, identifying opportunities to address negative impacts and enhance positive effects. Professional judgement was used to determine the impacts, based on the qualitative and quantitative background information. The process involved predicting the effects of the Lewisham RCIP in relation to each of the sustainability objectives by describing the changes that would arise as a result of implementation and determining the significance of impacts arising from these changes.
- 2.15 The changes have been described in terms of their magnitude, geographical scale and the time period over which they will occur. Permanent, temporary, positive, neutral, negative, short and long term, cumulative and synergistic effects are considered. The significance of an impact has been determined based on the scale and permanence of the effect. The nature and sensitivity of the receptor was also considered.
- B5: Considering ways of mitigating adverse effects and maximising beneficial effects.
- 2.16 Section 5 of this report includes the recommendations identified through the SA process and how these have been addressed within the RCIP SPD. Amendments to the supporting text have been proposed where required. Any recommendations are realistic, reasonable and relevant. The process of developing and refining the draft of the Lewisham RCIP text has been presented in the SA.
- 2.17 Any amendments to the supporting text have been considered against the sustainability objectives. The significant impacts have been identified. Measures to prevent, reduce or offset any significant negative sustainability impacts arising from the Lewisham RCIP have been proposed. Enhancement measures have been recommended to maximise the beneficial effects of the RCIP.
- B6: Proposing measures to monitor the significant effects of implementing the SPD.
- 2.18 Measures to monitor the significant sustainability impacts of the SPD have been agreed. Monitoring has been linked to the London Borough of Lewisham's existing monitoring processes, including the production of the Annual Monitoring Report. Details of the assessment, providing an audit trail of the assessment, and measures for mitigation, enhancement and monitoring is presented in the SA. The report includes a table detailing how the SA meets the requirements for SEA. The requirements of EAA have also been met. The proposed arrangements for monitoring are set out within Section 5 of this report.

### Stage C1: Reporting

- C1: Preparing the SA Report

### Stage D: Consulting on the SPD and SA Report

- D1: Consulting on the SPD and SA
- D2: Assessing significant changes and amending the SA

2.19 Consultation on the SA has been completed in parallel with the consultation on the Lewisham RCIP. The consultation responses on the Draft SA have been reviewed and inform the Final SA.

2.20 The Final SA will reflect any changes required as a result of stakeholder consultation. Mitigation and enhancement measures, in addition to the aims and methods for monitoring, will be finalised. Monitoring measures facilitate the use of results to inform future plans and SAs. Any changes to the Lewisham RCIP required as a result of Council scrutiny are to be considered against the SA framework. The assessment of changes will be as an addendum to the Final SA.

- D3: Decision making and providing information, including preparation of a SA adoption statement

2.21 An SA adoption statement will be prepared to outline the recommendations made throughout the process and any changes made to the Lewisham RCIP as a result.

### *Strategic Environmental Assessment*

2.22 This SA has, where appropriate, incorporated the requirements of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC). The SEA Directive requires that a formal assessment is undertaken of plans and programmes which are likely to have significant effects on the environment. The Directive has been transferred into UK law through the SEA Regulations (July 2004).

2.23 The SEA Directive focusses exclusively on environmental issues, whilst SA also encompasses social and economic concerns. Government guidance on SA has been prepared to meet the requirements of the SEA Directive. Consistent with this approach, the SA of the RCIP SPD addresses the requirements of the SEA Directive.

Table 2: The requirements of the SEA Directive

SEA Directive Requirements	Where reported
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I)	This SA Report

a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Scoping Report 2014, Section 3 and Appendix A of this report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Scoping Report 2013, Section 3 and Appendix B of this report.
c) The environmental characteristics of areas likely to be significantly affected;	Scoping Report 2013, Section 3 and Appendix B of this report
d) Any existing environmental problems which are relevant to the plan programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Scoping Report 2013, Section 3 and Appendix B of this report
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Scoping Report 2013, Section 3, Section 4 and Appendix A of this report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Section 4 of this report
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 5 of this report
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 2 and 3 of this report
i) A description of measures envisaged concerning monitoring in accordance with Article 10;	Section 5 and Appendix C of this report

<p>Consultation:</p> <p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</p> <p>Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</p>	<p>N/A</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).</p>	<p>The Statement of Consultation gives full details of all consultation undertaken throughout the process</p>
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:</p> <p>The plan or programme as adopted;</p> <p>A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <p>The measures decided concerning monitoring (Art. 9 and 10).</p>	<p>The Adoption Statement documents how environmental considerations have been integrated into the RCIP SPD</p> <p>Section 5 and Appendix C set out the proposed measures for monitoring</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10).</p>	<p>Section 5 and Appendix C of this report</p>
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).</p>	<p>This table identifies how the requirements of the SEA Directive have been met</p>

### ***Equalities Analysis Assessment***

- 2.24 Equalities Analysis Assessment (EAA) is the process of systematically analysing a proposed or existing policy to identify the likely affect from the implementation of the policy on different groups in the community. EAA seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. Local Authorities have a duty to complete an EAA of relevant plans under the Equality Act 2010.
- 2.25 The SA of the RCIP encompasses the requirements for EAA. The diverse needs of the Lewisham community will be considered during the production of the SA. There is no prescribed process for undertaking EAA. The methodology and the approach set out within the London Borough of Lewisham's EAA toolkit was followed in the preparation of the SA. The baseline analysis has included an assessment of data and research. Consultation on the SA has met the requirements for consultation in relation to EAA. The impact assessment has included due regard to the need to eliminate unlawful discrimination, to advance equality of opportunity and to foster good relations. Proposed measures for monitoring and mitigation reflect the objectives of EAA.

### ***Limitations and assumptions***

- 2.26 The data relates to the London Borough of Lewisham as a whole.
- 2.27 The following gaps in baseline data were identified through the assessment:
- Number of developments granted planning permission incorporating renewable energy solutions;
  - Total energy used in the borough from renewable schemes;
  - Number and location of healthcare facilities;
  - New affordable housing as a % of all new housing;
  - Tenure mix of affordable housing;
  - Number of bedrooms in new dwellings;
  - Planning applications obtaining new open space or public access linkages per year;
  - Number of planning applications approved with waste management/recycling facilities incorporated; and
  - Specific data covering public rights of way, cycle parking and lighting.
- 2.28 Gaps in baseline data will be addressed through the ongoing monitoring processes of the Council's Annual Monitoring Report.

### 3.0 Context, baseline and objectives

#### *London Borough of Lewisham Local Plan*

- 3.1 The Local Plan is a series of planning documents, which collectively provide the planning strategy and policies for the London Borough of Lewisham. The Local Plan documents are either procedural or policy based.
- 3.2 The following procedural documents have been approved or adopted by the London Borough of Lewisham:
- Local Development Scheme – the work programme which sets out the documents to be prepared and key dates for formulation, consultation and adoption;
  - Statement of Community Involvement – describes the Council's methods of involving the community in the preparation and review of the Local Plan and planning decisions; and
  - Annual Monitoring Report – sets out information on whether the Local Plan preparation is in accordance with the key dates within the Local Development Scheme and identifies whether the policies are achieving their targets.
- 3.3 The policy based documents and their status are described below:
- Core Strategy – the principal and overarching Local Plan document, adopted in June 2011;
  - Site Allocations Local Plan – identifies, designates and safeguards land for a particular use, adopted in June 2013;
  - Development Management Local Plan – sets out additional planning policies to guide decisions on planning applications, adopted in November 2014;
  - Lewisham Town Centre Local Plan – policies and proposals for development in Lewisham town centre, adopted in February 2014;
  - Supplementary Planning Documents – advice and guidance on policies and proposals contained in the development plan; and
  - Neighbourhood Plans – the vision and policy for how local people would like their area to develop. Neighbourhood forums and neighbourhood areas comprise Crofton Park and Honor Oak Park, and Grove Park.

3.4 *Lewisham RCIP SPD* - The SPD provides guidance on the rivers and river corridors in the London Borough of Lewisham. The aims of the SPD are to:

- Provide guidance for developers and landowners;
- Ensure high quality development along the river corridors;
- Ensure development enhances the river setting;
- Provide guidance on flood alleviation and ecological improvements;
- Ensure that development is appropriate and the impacts of development are effectively understood;
- Engage local communities in flood prone areas and encourage appropriate action;
- Encourage development which positively responds to rivers and their setting, ensuring that any necessary mitigation is designed from the earliest stage as an inherent part of the scheme;
- Improve overall water quality and river health.

3.5 The SPD objectives are as follows:

1. To protect and enhance the biodiversity and landscape value of the rivers in Lewisham;
2. To provide coordinated guidance for development adjacent to the London Borough of Lewisham's rivers, promoting regeneration and ensuring design is responsive to and makes the most of opportunities to enhance the river environment;
3. To promote the sustainable and efficient use of space by protecting and enhancing the multifunctional nature of the Ravensbourne, Quaggy and Pool Rivers, Deptford Creek and the River Thames;
4. To promote opportunities to manage flooding;
5. To safeguard and increase the role of the river corridors in the public realm, contributing to the open space network in the Borough, and to promote opportunities for sport, leisure, education, investment and employment;
6. To promote social inclusion and tackle deprivation and discrimination, ensuring that the river corridor is accessible to everyone as part of the blue ribbon network;
7. To promote opportunities for walking and cycling by ensuring existing routes, such as the Waterlink Way and Route 21, are maintained and where possible enhanced, and by promoting opportunities to overcome barriers to the public rights of way network;
8. To promote improved access to rivers and increased public awareness.

3.6 The vision is a coordinated approach to bring the River Thames, Deptford Creek, the River Ravensbourne, the River Quaggy, Pool River and Kyd Brook back to the heart of Lewisham, as distinctive and attractive focal points that bring together local communities and wildlife, promoting healthy living whilst reducing flood risk and the impacts of climate change.

***Plans, policies and programmes***

- 3.7 This section summarises plans, policies, programmes and related sustainability objectives established at other levels of the planning system that are relevant to the SA of the RCIP SPD. International, European, National, London wide and Lewisham based plans and strategies are considered where they are relevant.
- 3.8 Table 3 provides a list of those reviewed in the context of the RCIP SPD. Appendix A provides further detail, explaining the plans, policies and programmes relevance to the RCIP SPD and the SA, and how they have been considered during the SA process.

Table 3: Plans, policies and programmes

Plans, Policies and Programmes	
International	
	<ul style="list-style-type: none"> <li>• The Johannesburg Declaration on Sustainable Development 2002</li> <li>• The Kyoto Agreement 1997</li> <li>• Convention concerning the Protection of the World Cultural and Natural Heritage 1972 (UNESCO)</li> <li>• Agenda 21 Declaration and Rio +20, UNCED Rio de Janeiro 1992 and 2012</li> <li>• Convention on Biological Diversity, Rio de Janeiro 1992</li> </ul>
European	
	<ul style="list-style-type: none"> <li>• SEA Directive 2001/42/EC</li> <li>• European Sustainable Development Strategy 2001 and the reviews of the European Sustainable Development Strategy 2006 and 2009</li> <li>• European Spatial Declaration on Sustainable Development 1999</li> <li>• European Spatial Development Perspective 1999</li> <li>• European Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC and 97/62/EC)</li> <li>• European Directive on Conservation of Wild Birds (2009/147/EC and 79/409/EEC)</li> <li>• European Noise Directive (2002/49/EC)</li> <li>• European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives</li> <li>• European Water Framework Directive (2000/60/EC)</li> <li>• EU Biodiversity Strategy to 2020</li> <li>• European Directive on the landfill of waste (99/31/EC)</li> <li>• European Waste Framework Directive (2006/12/EC)</li> <li>• Directive establishing a scheme for greenhouse gas emission allowance trading (2003/87/EC)</li> <li>• EU Seventh Environmental Action Plan to 2020</li> <li>• European Directive on the assessment and management of flood risks (2007/60/EC)</li> </ul>
National	
	<ul style="list-style-type: none"> <li>• National Planning Policy Framework</li> </ul>

- Environmental Assessment of Plans and Programmes Regulations 2004
- Planning and Compulsory Purchase Act 2004
- Town and Country Planning Act 1990
- Housing Act 2004
- Planning and Energy Act 2008
- Climate Change Act 2008
- Noise Policy Statement for England 2010
- The Air Quality Strategy 2007
- The Waste (England and Wales) Regulations 2011
- Environment Agency, Creating a better place strategy 2010-2015
- Thames Estuary (TE2100) Plan – Managing flood risk through London and the Thames Estuary
- Thames River Basin Management Plan 2009
- Growth and Infrastructure Act 2013
- Flood and Water Management Act 2010
- Localism Act 2011
- National Flood and Coast Erosion Management Strategy 2011
- Civil Contingencies Act 2004
- Building Regulations
- The Code for Sustainable Homes
- Surface Water Management Plans
- Guidance on producing Preliminary Flood Risk Assessments
- Climate Change and the Historic Environment 2008
- SEA, SA and the historic environment 2013
- Seeing History in the View 2011
- Streets for All 2004
- National Adaption Programme – Making the country resilient to a changing climate 2013
- UK Climate Change Risk Assessment 2012
- National Flood Emergency Framework for England 2014
- Our River Habitats – The state of river habitats in England, Wales and the Isle of Man 2010
- Working with Natural Processes to Manage Flood and Coastal Erosion Risk 2010
- Greater working with Natural Processes to Manage Flood and Coastal Erosion Risk 2012

#### London

- The London Plan 2011
- The Mayor's Air Quality Strategy 2010
- The Mayor's Economic Development Strategy 2010

- London Biodiversity Action Plan
- The Mayor's Cultural Strategy 2010
- London Climate Change Adaptation Strategy 2011
- The Mayor's Transport Strategy 2010
- The Mayor's Municipal Waste Management Strategy 2011
- The Mayor's Ambient Noise Strategy 2004
- The London Housing Strategy 2014
- London Tree and Woodland Framework 2005
- London View Management Framework SPG 2012
- The London Rivers Action Plan 2009
- The Mayor's Best Practice Guidance on Health Issues in Planning 2007
- Sustainable Design and Construction SPG 2014
- Accessible London: Achieving an inclusive environment SPG 2014
- East London Green Grid Framework SPG 2008
- Shaping Neighbourhoods Character and Context SPG 2014
- London Planning Statement SPG 2014
- Housing in London 2014
- All London Green Grid 2012
- London's Foundations 2012
- London Catchment Abstraction Management Strategy 2013
- East London Strategic Flood Risk Assessment
- Regional Flood Risk Appraisal for the London Plan

#### Lewisham

- Lewisham Site Allocations Local Plan 2013
- Lewisham Town Centre Local Plan 2014
- Lewisham Sustainable Community Strategy 2008 - 2020
- Lewisham Core Strategy 2011
- Safer Lewisham Strategy 2011 - 2014
- Lewisham Development Management Local Plan 2014
- Lewisham Regeneration Strategy 2008 - 2020
- Lewisham Housing Strategy 2009 - 2014
- Lewisham Municipal Waste Management Strategy 2008
- Lewisham Children and Young People's Plan 2012 - 2015
- Lewisham Carbon Reduction and Climate Change Strategy 2008
- Lewisham Social Inclusion Strategy 2005
- Healthier Communities: A health and well-being framework for Lewisham 2007
- Lewisham Leisure and Open Space Study 2010
- Lewisham Open Space Strategy 2012 - 2017

- Local Biodiversity Action Plan – A Natural Renaissance for Lewisham 2006
- Better Futures: Lewisham's Homelessness Prevention Strategy 2009 - 2014
- Lewisham Borough Sports Plan 2010
- Lewisham Local Air Quality Action Plan 2009
- Lewisham Strategic Flood Risk Assessment 2015
- Lewisham Flood Risk and Development Sequential Test 2009
- Lewisham Local Implementation Plan 2011-2031
- Lewisham Strategic Housing Market Assessment 2008
- Lewisham Health and Wellbeing Strategy 2013
- Lewisham Conservation Area Management Plans
- Lewisham Borough Wide Character Study 2010
- Healthy Weight Healthy Lives (PCT with LB Lewisham) 2009
- Lewisham Cultural Strategy 2009 - 2013
- Lewisham Ravensbourne RCIP 2010
- Lewisham Planning Obligations SPD 2011
- Lewisham Bromley Road SPD 2009

***Current and predicted future social, economic and environmental baseline characteristics***

- 3.9 The baseline outlines the current and likely future state of the London Borough of Lewisham. The baseline provides the context for predicting and monitoring the impacts of the Lewisham RCIP SPD. The baseline assessment supports the identification of the sustainability issues in the London Borough of Lewisham relevant to the RCIP SPD. The baseline information was reported in the RCIP SPD Scoping Report 2013. The relevant information is set out in Appendix B.
- 3.10 The baseline data and the policy context have been used to identify the relevant requirements, the current issues and the likely future trends in the London Borough of Lewisham. In some cases there are constraints which must be overcome, or impacts which must be avoided. In other cases the baseline presents opportunities.
- 3.11 The general sustainability issues for the Lewisham RCIP have been identified and are presented under broad themes in Table 4, below.

Table 4: Sustainability Requirements, Issues and Trends

<b>Key issues</b>
<b>Social progress that meets the needs of everyone</b>
<b>Housing</b>
<p>The population in Lewisham is expected to rise which puts pressure on the existing housing stock.</p> <p>The demand for affordable housing in Lewisham is very high due to the average income of the majority of households being insufficient to buy a house.</p>
<b>Health</b>
<p>The health of the Lewisham population is an essential consideration, including access to open space for exercise including walking and cycling, and healthcare.</p>
<b>Poverty</b>
<p>There are areas with high levels of poverty and social deprivation in the London Borough of Lewisham.</p>
<b>Crime</b>
<p>Crime, antisocial behavior and fear of crime are important considerations.</p> <p>A safe environment should be created, with high quality, people friendly spaces.</p> <p>Pedestrian movements, lighting and improvements to unsafe areas should be considered.</p>
<b>Leisure, Tourism and Community Infrastructure</b>
<p>There is a demand for leisure facilities in Lewisham, especially for young people.</p> <p>A diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to residents, workers and visitors, should be considered.</p> <p>There is a desire to increase the use of the Blue Ribbon Network for passenger and tourist river services.</p>
<b>People, diversity and inclusive environments</b>
<p>Lewisham is the 15<sup>th</sup> most ethnically diverse local authority in England and 130 different languages are spoken.</p> <p>Development is required to achieve the highest standards of accessible and inclusive design and to support the following principles of inclusive design:</p> <ul style="list-style-type: none"> <li>• can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances;</li> <li>• are convenient and welcoming with no disabling barriers, so everyone can use them independently without undue effort, separation or special treatment;</li> <li>• are flexible and responsive taking account of what different people say they need and want;</li> <li>• are realistic, offering more than one solution to help balance everyone's needs, recognising that one solution may not work for all.</li> </ul>
<b>Effective protection of the environment and prudent use of resources</b>
<b>Waste</b>
<p>Waste generation should be reduced and recycling rates should be improved.</p> <p>Development must ensure adequate wastewater infrastructure capacity is available.</p>

<p><b>Transport and Access</b></p> <p>Public transport needs to be made more appealing and car movements and car parking should be better managed.</p> <p>Development should improve connectivity throughout the area for pedestrians and cyclists.</p> <p>Development should provide new accessible public spaces and contribute to improving the relationship with the River Thames.</p> <p>There is a need to reduce pollution from transport, particularly private cars.</p> <p>Use of the Thames and other waterways for public transport and freight movements should be promoted.</p>
<p><b>Landscape and Cultural Heritage</b></p> <p>There are areas of Lewisham which require an improved image, in terms of design and the built form.</p> <p>Spaces and places need to be balanced with the need to protect Listed Buildings, Conservation Areas and other heritage assets, respecting the architectural identity and character of the Borough.</p> <p>The design of the natural environment requires consideration in terms of open space.</p> <p>Links with the Thames, increased connectivity to the streetscape and creation of a sense of place should be established through development.</p>
<p><b>Climate Change</b></p> <p>Climatic change due to greenhouse gas emissions from fossil fuel use is likely to affect the natural environment.</p> <p>There is a need to increase the proportion of energy used from renewable resources (including decentralised energy networks).</p> <p>Sustainable and Efficient Land Use should be promoted, with a clear integration with transport.</p> <p>Climate change will affect the following:</p> <ul style="list-style-type: none"> <li>• Frequency of flooding. Damage to roads and overloading of sewers may become more commonplace;</li> <li>• Historic and urban environment. Affecting built form and infrastructure;</li> <li>• Population Health. With extremes of temperature, expected; and</li> <li>• Biodiversity within the area.</li> </ul> <p>Development must take measures to mitigate and offset these issues.</p>
<p><b>Air, Noise and Soil</b></p> <p>The Air Quality Strategy objectives should be adhered to, particularly within the London Borough of Lewisham's five Air Quality Management Areas.</p> <p>Future development must encompass and encourage a reduction in air pollution.</p> <p>Development proposals should seek to reduce noise by:</p> <ul style="list-style-type: none"> <li>• Promoting practices and technologies to reduce noise;</li> <li>• Separating noise sensitive development from major noise sources; and</li> <li>• Minimising existing and potential impacts of noise (on and off site).</li> </ul> <p>Development of brownfield land should include appropriate measures to prevent any significant harm to human health or the environment in relation to ground contamination.</p>

Sustainable drainage systems should be implemented.
<b>Biodiversity (Flora / Fauna) and Open Space</b>
<p>The value of urban green spaces and their contribution to regeneration and quality of life should be recognised. Green spaces provide opportunities for people to have contact with the natural world and are essential for providing habitats to encourage biodiversity.</p> <p>Access to open and green space in the borough, and the maintenance of existing green infrastructure, should be improved.</p> <p>Urban greening should be promoted, including planting in the public realm and the provision of multifunctional green infrastructure, supporting climate change mitigation and adaptation.</p> <p>The rivers in the Borough should be effectively protected, managed and restored, contributing to recreation, amenity, well-being and biodiversity.</p> <p>The potential effects of development upon biodiversity, wildlife habitats, geological features and nature conservation must be taken into account.</p> <p>Invasive plants associated with the watercourse are present along the Ravensbourne and this is an area in which improvement and future prevention/protection will be important for the biodiversity of the watercourse.</p>
<b>Water and rivers/waterways</b>
<p>Water efficiency initiatives are needed to reduce daily water use and maintain the supply-demand balance. Development shall install practices and technologies to achieve this.</p> <p>At least one in five of residential and non-residential properties are at risk from flooding from water sources in Lewisham. With climate change the frequency and severity of storms and flooding will increase. Measures are needed to mitigate affects upon existing development and land uses.</p> <p>Sustainable urban drainage systems should be implemented.</p> <p>Development should restore and enhance London's Blue Ribbon Network.</p> <p>Restoration and management of waterways should focus upon natural processes to prevent erosion and mitigate for flooding.</p> <p>The area of open space should be increased to provide flood storage.</p> <p>Development adjacent to rivers and waterways should contribute to their special character by improving:</p> <ul style="list-style-type: none"> <li>• The urban design quality and natural ability of the rivers and waterways to function;</li> <li>• The viability of river frontages;</li> <li>• Improving access to the foreshore and naturalising flood defenses; and</li> <li>• Promote water related uses and transport uses.</li> </ul>
<b>Maintenance of high and stable levels of economic growth</b>
<b>Employment</b>
<p>With population in the borough expected to increase there is a requirement to protect and improve the local economy and minimise the need to source employment from outside.</p> <p>Sustained economic growth is essential as Lewisham's underlying economy is one of the smallest in London.</p> <p>The development (and re-development) of employment uses must improve the overall environmental quality through associated provisions.</p>

## Education

Access to education, skills and training is vital, as 25 percent of the population of Lewisham has no qualifications. A linkage with apprentice schemes needs to be considered.

### *Sustainability appraisal objectives, targets and indicators*

- 3.12 The sustainability objectives provide a method for describing, analysing and comparing the sustainability effects of the RCIP SPD. A series of sustainability objectives were developed at the scoping stage, taking into account the relationship between the RCIP SPD and the objectives of other plans and programmes, along with the findings of the baseline information review. The sustainability objectives were developed and consulted on as part of the scoping process. These objectives have been refined to reflect the changing sustainability concerns in the borough.
- 3.13 The objectives are supported by specific, measurable, achievable, realistic and time-related (SMART) indicators. The objectives and indicators facilitate the comparison of options, the prediction and assessment of impacts and monitoring. The SA framework focuses on areas where significant effects are likely. The sustainability objectives and indicators are presented in Table 5, below.

Table 5: SA Objectives and Indicators

SA Objective	Indicator
Social	
1. To provide sufficient housing and the opportunity to live in a decent home	Number of housing completions Number of affordable housing completions (by tenure type) Mix of housing tenure Mix in dwelling sizes Provision of student/other specialist housing
2. To improve the health of the population	Households with limiting long-term illness Mortality rate from circulatory diseases at age under 75 Mortality rate from all cancers at age 75 of under Health life expectancy at age 65 Number of people taking part in activities that improve physical and mental health in the borough
3. To reduce poverty and social exclusion	Number of recorded racial incidents Indices of Multiple Deprivation
4. To reduce crime, antisocial behavior and the fear of crime	Number of schemes incorporating 'secured by design' Number of offences per 1,000 population Detailed indicators for the following:

	<ul style="list-style-type: none"> <li>• Violence against the person</li> <li>• Burglaries</li> <li>• Robberies</li> <li>• Violent crime</li> <li>• Sexual offences</li> </ul>
5. To improve accessibility to leisure facilities, community infrastructure and key local services	<p>Gain/loss of community/recreational facilities</p> <p>Delivery of identified social infrastructure</p> <p>Funding for community facility improvements secured</p>
6. To improve accessibility and achieve all principles of inclusive design.	<p>Number of complaints related to accessibility concerns/incidents.</p> <p>Number of complaints related to discrimination concerns/incidents.</p> <p>Provision of suitable disabled access facilities to existing and proposed development.</p>
<b>Environmental</b>	
7. To minimise the production of waste and increase waste recovery and recycling	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p> <p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>
8. To reduce car travel and improve accessibility by sustainable modes of transport	<p>Number of car parking spaces delivered in new development</p> <p>Number of completed car limited developments</p> <p>Number of car clubs and parking bays</p> <p>% of permitted major developments with a travel plan</p> <p>Proportion of journeys made on foot and by bicycle</p> <p>Number of electric car charging points</p> <p>Improvements to legibility and signage</p> <p>Improved pedestrian and cycle routes and crossings</p> <p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p>

	<p>Public transport accessibility levels</p> <p>Improved river and waterways routes and access</p>
<p>9. Maintain and enhance landscapes and townscapes. To conserve and where appropriate enhance the historic environment</p>	<p>Number of key views maintained and enhanced</p> <p>Pre applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p> <p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p> <p>% of applications where archaeological strategies were developed and implemented</p> <p>Number of applications that have considered views of strategic importance</p> <p>Condition of designated and undesignated heritage assets</p>
<p>10. To mitigate and adapt to the impact of climate change</p>	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>
<p>11. To improve air quality and soil conditions and reduce noise and vibration</p>	<p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p> <p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments</p>

	<p>and refurbishments</p> <p>Number of Brownfield sites redeveloped</p> <p>Areas of land brought back into beneficial use</p>
<p>12. To increase, maintain and enhance open space, biodiversity, flora and fauna</p>	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINCs</p> <p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p> <p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p>
<p>13. To mitigate flood risk. Improve water quality and manage water resources. To restore and enhance the river network</p>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Water pollution incidents</p> <p>Flooding incidents</p> <p>Change in chemical river quality</p> <p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p> <p>River restoration projects</p> <p>Funding secured for waterways improvements</p>
<p>Economic</p>	
<p>14. To encourage sustained economic growth</p>	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p> <p>Amount of new completed employment floor space</p>

	<p>New business registration rate</p> <p>Rent levels of employment accommodation</p>
<p>15. To promote access to employment, education, skills and training</p>	<p>Employee numbers in Lewisham</p> <p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p> <p>Numbers of employees and business owners who are BME</p> <p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p> <p>People aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>

## 4.0 Sustainability Appraisal

### *Sustainability Appraisal of the RCIP objectives*

- 4.1 It is important that the aims and objectives of the RCIP are in accordance with sustainability principles. The RCIP objectives have been tested for compatibility with the sustainability objectives, to assist, where necessary, in refining the RCIP SPD aims and objectives, and in identifying options. The following relationships and corresponding symbols have been used in the assessment of the compatibility of the sustainability and RCIP SPD objectives:

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

- 4.2 Table 6 sets out the assessment of the compatibility of sustainability objectives and RCIP SPD objectives. The assessment demonstrates that the objectives are compatible.

Table 6: Assessment of compatibility of sustainability and RCIP SPD objectives

SA Objectives	RCIP objectives							
	1	2	3	4	5	6	7	8
1. To provide sufficient housing and the opportunity to live in a decent home	0	√	0	√	0	0	0	0
2. To improve the health of the population	√	√	√	√	√	√	√	√
3. To reduce poverty and social exclusion	0	√	0	0	√	√	0	0
4. To reduce crime, antisocial behavior and the fear of crime	0	√	0	0	0	√	0	0
5. To improve accessibility to leisure facilities, community infrastructure and key local services	0	0	√	0	√	√	√	√
6. To improve accessibility and achieve all principles of inclusive design.	0	0	0	0	0	√	0	√
7. To minimise the production of waste and increase waste recovery and recycling	0	0	0	0	0	0	0	0
8. To reduce car travel and improve accessibility by sustainable modes of transport	0	0	0	0	0	0	√	0
9. Maintain and enhance landscapes and townscapes. To conserve and where appropriate enhance the historic environment	√	0	0	0	0	0	0	0
10. To mitigate and adapt to the impact of climate change	√	0	0	√	0	0	0	0
11. To improve air quality and soil conditions and reduce noise and vibration	0	0	0	0	0	0	0	0
12. To increase, maintain and enhance open space, biodiversity, flora and fauna	√	0	√	0	0	0	0	√

13. To mitigate flood risk. Improve water quality and manage water resources. To restore and enhance the river network	√	√	√	√	√	0	0	0
14. To encourage sustained economic growth	0	√	0	0	√	0	0	0

### ***Assessment of strategic alternatives***

- 4.3 In developing the RCIP SPD a series of options and alternatives were produced and considered against the sustainability objectives. This highlighted potential conflict or opportunities and aimed to strengthen the delivery of the sustainability objectives. Recommendations have been made and incorporated into the SPD where appropriate.

### ***Assessment of RCIP SPD aims and vision***

- 4.4 The RCIP SPD aims and vision have been assessed in accordance with the SEA Directive and related UK regulations. The likely significant effects on the environment of implementing the SPD are identified, described and evaluated in Table 7. An evidence based approach has been adopted to:
- Identify the changes to the environmental baseline which are predicted to arise from the implementation of the SPD;
  - Describe the changes in terms of their magnitude, geographical scale, time period over which they will occur, whether they are permanent or temporary, positive or negative, the level of probability of the effect arising, and any secondary, cumulative and/or synergistic effects.
- 4.5 The assessment incorporates an EAA. The RCIP SPD has been systematically analysed to identify the effect, or likely effect, of implementation for different groups in the community. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.
- 4.6 Evidence based predictions and evaluations are both qualitative and quantitative. The aims and vision of the SPD have been assessed in terms of their impact against the sustainability objectives. The assessment is set out in Table 7.

Table 7: Assessment of the aims and vision of the RCIP SPD

	Aims							Vision				
	Provide guidance for developers and landowners	Ensure high quality development along the river corridors	Ensure development enhances the river setting	Provide guidance on flood alleviation and ecological improvements	Ensure that development is appropriate and that the impacts of development are effectively understood	Engage local communities in flood prone areas and encourage appropriate action	Encourage development which positively responds to rivers and their setting, ensuring that any necessary mitigation is designed in from the earliest stage as an inherent part of the scheme	Improve the overall water quality and river health	Protect and enhance the environment along the river corridors	Reduce flood risk	Support strong, prosperous and vibrant communities along Lewisham's rivers	Contribute to healthy communities, through recreation and leisure provision along the river corridors
1. To provide sufficient housing and the opportunity to live in a decent home	√	√	0	0	√	0	0	0	0	√	0	0
2. To improve the health of the population	0	0	√	0	√	√	0	√	√	√	√	√
3. To reduce poverty and social exclusion	0	√	0	0	√	√	0	0	0	0	√	0
4. To reduce crime, antisocial behavior and the fear of crime	0	√	0	0	√	0	0	0	0	0	√	0
5. To improve accessibility to leisure facilities, community infrastructure and key local services	√	√	√	0	√	0	√	0	0	0	0	√

6. To improve accessibility and achieve all principles of inclusive design.	√	√	0	0	√	0	√	0	0	0	0	0
7. To minimise the production of waste and increase waste recovery and recycling	0	0	0	0	√	0	0	0	0	0	0	0
8. To reduce car travel and improve accessibility by sustainable modes of transport	0	0	0	0	√	0	0	0	0	0	0	0
9. Maintain and enhance landscapes and townscapes. To conserve and where appropriate enhance the historic environment	√	√	√	0	√	0	√	0	√	0	0	0
10. To mitigate and adapt to the impact of climate change	√	0	0	√	√	√	√	0	0	√	0	0
11. To improve air quality and soil conditions and reduce noise and vibration	0	0	0	√	√	0	0	0	0	0	0	0
12. To increase, maintain and enhance open space, biodiversity, flora and fauna	0	0	0	0	0	0	√	0	0	0	0	√

13. To mitigate flood risk. Improve water quality and manage water resources. Restore and enhance the river network	0	0	0	✓	✓	✓	✓	✓	0	✓	0	0
14. To encourage sustained economic growth	✓	✓	✓	0	✓	0	0	0	0	0	✓	0

## 5.0 Mitigation and monitoring

### *Mitigation*

5.1 The SA of Lewisham RCIP SPD has not identified a requirement for mitigation measures associated with the implementation of the document, as the policies will have a positive social, economic and environmental impact. Requirements for mitigation may be identified through the monitoring process. If mitigation measures are required in future, these should be developed based on the following mitigation hierarchy:

Table 8: Mitigation hierarchy

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

### *Monitoring*

5.2 The indicators relating to each sustainability objective are set out in Table 5. Appendix C sets out the targets, monitoring frequency, data sources and actions relating to each indicator. Monitoring will be completed by the London Borough of Lewisham and presented within the Annual Monitoring Report.

Appendix A  
Plans, Policies and Programmes

Plans, Policies and Programmes	Relevant objectives	Implications for the Lewisham River Corridor Improvement Plan and SA
International – All info apart from the National Section is taken from the 2005 Scoping Report		
The Johannesburg Declaration on Sustainable Development 2002	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	The definition of sustainable development 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'.
The Kyoto Agreement 1997	The key aim is to limit and/or reduce the emissions of greenhouse gases.	Reducing greenhouse gas emissions.
Convention concerning the Protection of the World Cultural and Natural Heritage 1972 (UNESCO)	Article 5 – To ensure that effective and active measures are taken for the protection, conservation and presentation of cultural and natural heritage and to adopt a general policy which aims to give the cultural and natural heritage a function in the life of the community and to integrate the protection of that heritage into comprehensive planning programmes.	The protection of Lewisham's cultural and natural heritage.
Agenda 21 Declaration Rio de Janeiro 1992 <b>and Rio +20 2012</b>	Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993 <b>and was reaffirmed in 2012</b> . It has three main objectives: <ul style="list-style-type: none"> <li>• Conserve biological diversity;</li> <li>• Sustainable use of biological diversity;</li> <li>• Fair and equitable sharing of the benefits of biological diversity.</li> </ul>	The integration and balancing of economic, environmental and social objectives. Ensure the protection and enhancement of the area's biodiversity.
Convention on Biological Diversity, Rio de Janeiro 1992	The Convention outlines three main goals for the conservation, protection and enhancement of biological diversity; the conservation of biological diversity, its sustainable use, and the equitable sharing of benefits associated with genetic resources. National strategies and action plans must be implemented by Contracting Parties to achieve these goals.	Minimise impacts on biodiversity. View ecosystems holistically, rather than focussing on islands of protected species.
European		
SEA Directive (2001/42/EC)	Requires an assessment of the effects of certain plans and programmes on the environment and prescribes the environmental issues to assess.	Ensure key environmental issues are assessed and considered.

<p>European Sustainable Development Strategy <b>2001 and the reviews of the European Sustainable Development Strategy 2006 and 2009</b></p>	<p>Environmental objectives and priorities derived from the EU Sixth Environmental Action Programme focus on:</p> <ul style="list-style-type: none"> <li>• limiting climate change and increasing the use of clean energy;</li> <li>• addressing threats to public health (e.g. hazardous chemicals, food safety);</li> <li>• combating poverty and social exclusion;</li> <li>• dealing with the economic and social implications of an ageing society;</li> <li>• managing natural resources more responsibly (including biodiversity and waste generation);</li> <li>• improving the transport system and land use management.</li> </ul>	<p>The integration and balancing of economic, environmental and social objectives.</p>
<p>European Spatial Declaration on Sustainable Development 1999</p>	<p>The aim is to work towards a balanced and sustainable development of the territory of the European Union.</p>	<p>The integration and balancing of economic, environmental and social objectives.</p>
<p>European Spatial Development Perspective 1999</p>	<p>ESDP aims to ensure that the three fundamental goals of European policy are achieved equally in all the regions of EU:</p> <ul style="list-style-type: none"> <li>• economic and social cohesion;</li> <li>• conservation and management of natural resources and the cultural heritage;</li> <li>• more balanced competitiveness of the European territory.</li> </ul>	<p>Economic and social cohesion, protecting and enhancing historic and cultural heritage, and reducing greenhouse gas emissions.</p>
<p>European Directive on the conservation of natural habitats and of wild fauna and flora <b>(92/43/EEC and 97/62/EC)</b></p>	<p>Promote the maintenance of biodiversity by requiring member states to introduce robust protection measures to maintain or restore natural habitats and wild species.</p>	<p>Minimise the impact on natural habitats.</p>
<p>European Directive on Conservation of Wild Birds <b>(2009/147/EC and 79/409/EEC)</b></p>	<p>The maintenance of the favourable conservation status of all wild bird species across their distributional range.</p>	<p>Preserve habitats for birds.</p>

European <b>Noise</b> Directive (2002/49/EC)	The Environmental Noise Directive aims to “define a common approach intended to avoid, prevent or reduce on a prioritised basis the harmful effects, including annoyance, due to the exposure to environmental noise”. It aims at providing a basis for developing EU measures to reduce noise emitted by major sources, in particular road and rail vehicles and infrastructure, aircraft, outdoor and industrial equipment and mobile machinery.	Mitigation of adverse impacts on health and well-being from temporary and permanent noise nuisance.
European Directive on Ambient Air Quality Assessment and Management (96/62/EC) and daughter directives	The Directives aim to reduce specified air pollutants. Limits have been translated into UK law in Air Quality Regulations.	Monitor progress in relation to air quality.
European <b>Water Framework</b> Directive (2000/60/EC)	To establish a framework to address pollution of waterways from urban wastewater and agriculture and to improve Europe’s waterways. Target: Member States to produce River Basin Management Plans by 2009 and to achieve the environmental objectives of the Plans by 2016.	Protection of ground and surface water from incidental, as well as accidental pollution.
EU Biodiversity Strategy <b>to 2020</b>	Seeks the conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).	Protection and enhancement of biodiversity.
<b>European Directive on the landfill of waste</b> (99/31/EC)	To prevent or reduce as far as possible negative effects on the environment, in particular the pollution of surface water, ground water, soil and air, and on the global environment, including the greenhouse effect, as well as any resulting risk to human health, from the land-filling of waste, during the whole life-cycle of the landfill.	Minimise waste generation and maximise sustainable waste management.
European Waste Framework Directive (2006/12/EC)	The Directive seeks to reduce the quantity of waste going to landfill and introduces the waste hierarchy of prevention, reuse, recycle, recovery, and disposal.	Reduce the amount of waste requiring final disposal. Monitor the proportion of waste reduced/recycled/recovered.
Directive <b>establishing a scheme for greenhouse gas emission allowance trading</b> (2003/87/EC)	Introduces a European wide emissions trading scheme.	Reduce greenhouse gas emissions and overall carbon footprint. Reflect carbon reduction targets.

EU <b>Seventh</b> Environmental Action Plan <b>to 2020</b>	Seeks a high level of protection of the environment and human health and for general improvements in the environment and quality of life.	Protect and enhance overall environmental quality.
European Directive <b>on the assessment and management of flood risks (2007/60/EC)</b>	The Floods Directive applies to river basins and coastal areas at risk of flooding. With trends such as climate change and increased domestic and economic development in flood risk zones, this poses a threat of flooding in coastal and river basin areas.	Reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity.
<b>National</b>		
National Planning Policy Framework	The National Planning Policy Framework includes a presumption in favour of sustainable development and sets out the social, economic and environmental roles of the planning system.	A presumption in favour of sustainable development, considering the social, economic and environmental roles of the planning system.
Environmental Assessment of Plans <b>and</b> Programmes Regulations 2004	Transposes the SEA directive into UK law.	Reflect the regulations and associated guidance note.
Planning and Compulsory Purchase Act 2004	The Act provides the statutory planning framework for England.	Comply with legislation.
Town and Country Planning Act 1990	Sets out the procedures for the preparation, approval and adoption of Local Plans.	Comply with legislation.
Housing Act 2004	Part 1 - Housing conditions. Part 2 - Licensing of houses in multiple occupation Part 3 - Selective licensing of other residential accommodation Part 4 - Additional control provisions in relation to residential accommodation Part 5 - Home information packs Part 6 - Other provisions about housing Part 7 - Supplementary and final provisions	Comply with legislation.
Planning and Energy Act 2008	An Act to enable Local Planning Authorities to set requirements for energy use and energy efficiency in Local Plans.	Energy efficiency to reduce greenhouse gas emissions.

Climate Change Act 2008	The Act creates a new approach to managing and responding to climate change in the UK.	Consideration of impacts on Climate Change.
Noise Policy Statement for England 2010	<p>The Noise Policy Statement for England aims to provide the necessary clarity and direction to enable decisions to be made regarding what is an acceptable noise burden to place on society.</p> <p>To avoid significant adverse impacts on health and quality of life; mitigate and minimise adverse impacts on health and quality of life; and where possible, contribute to their improvement.</p>	<p>Avoid noise impacts.</p> <p>Mitigation of adverse impacts on health and well-being from noise.</p>
<b>The Air Quality Strategy 2007</b>	Everyone can enjoy a level of ambient air quality in public places which poses no significant risk to health or quality of life.	<p>Improve Air Quality.</p> <p>Encourage reduction or mitigation of air polluting land uses.</p>
<b>The Waste (England and Wales) Regulations 2011</b>	<p>The Strategy seeks to:</p> <ul style="list-style-type: none"> <li>• Reduce waste by making products with fewer natural resources;</li> <li>• Break the link between economic growth and waste growth;</li> <li>• Most products should be used or their materials recycled;</li> <li>• Recover energy from other wastes.</li> </ul>	Waste hierarchy – reduce, reuse, recycle.
Environment Agency, Creating a better place strategy 2010-2015	The strategy shows how the EA will work in specific areas to achieve its aims relating to biodiversity, climate change, flood risk, creating sustainable places and waste management.	Biodiversity, climate change, flood risk, and waste management.
Thames Estuary (TE2100) Plan - Managing flood risk through London and the Thames estuary	Provides an overview of flood risk in the Thames catchment and sets out the EAs preferred plan for sustainable flood risk management over the next 50 to 100 years.	Manage flood risk.
Thames River Basin Management Plan 2009	Pressures facing the water environment in this river basin district, and the actions that will address them.	Protection of water quality.

<b>Growth and Infrastructure Act 2013</b>	To enhance the viability of development and to speed up the planning process.	Compliance with legislation.
<b>Flood and Water Management Act 2010</b>	To provide new legislation on Flood and Coast Erosion Management.	Consistent with the London Borough of Lewisham's responsibility for preparing and putting in place strategies for managing flood risk from groundwater, surface water and ordinary watercourses.
<b>Localism Act 2011</b>	To provide for neighbourhood development orders. To introduce a duty to cooperate. To make arrangements for the scrutiny of risk management authorities.	Compliance with legislation.
<b>National Flood and Coast Erosion Management Strategy 2011</b>	<p>Objective</p> <ul style="list-style-type: none"> <li>• ensure a clear understanding of the risks of flooding and coastal erosion.</li> <li>• set out clear and consistent plans for risk management.</li> <li>• manage flood and coastal erosion risks in an appropriate way.</li> <li>• ensure that emergency plans and responses to flood incidents are effective.</li> <li>• help communities to recover more quickly and effectively after incidents.</li> </ul> <p>Aim</p> <ul style="list-style-type: none"> <li>• put in place long-term plans to manage risks ensuring other plans take account of them.</li> <li>• avoid inappropriate development in areas of flood and coastal erosion risk.</li> <li>• building, maintaining and improving FCERM infrastructure and systems.</li> <li>• increasing public awareness of the risk that remains.</li> <li>• improving the detection, forecasting and issue of warnings of flooding.</li> </ul>	Reflect the Management Strategy.

	<ul style="list-style-type: none"> <li>• planning for and co-ordinating a rapid response to flood emergencies and recovery.</li> </ul>	
<p><b>Civil Contingencies Act 2004</b></p>	<p>To provide a single framework for civil protection. The National Flood and Coast Erosion Management Strategy requires communities to prepare flood action plans and link with the Cabinet Office's initiative to develop wider community resilience to threats and hazards. Part 1 of the Act and supporting Regulations and statutory guidance establish a clear set of roles and responsibilities for those involved in emergency preparation and response at the local level. They are required to:</p> <ul style="list-style-type: none"> <li>• assess the risk of emergencies occurring and use this to inform contingency planning;</li> <li>• put in place emergency plans;</li> <li>• put in place Business Continuity Management arrangements;</li> <li>• put in place arrangements to make information available to the public about civil protection matters and maintain arrangements to warn, inform and advise the public in the event of an emergency;</li> <li>• provide advice and assistance to businesses and voluntary organisations about business continuity management (Local Authorities only);</li> <li>• share information with other local responders to enhance co-ordination; and</li> <li>• co-operate with other local responders to enhance co-ordination and efficiency.</li> </ul>	<p>Compliance with legislation.</p>

<p><b>Building regulations</b></p>	<p>The Department for Communities and Local Government is responsible for policy on Building Regulations. These exist to ensure the health, safety, welfare and convenience of people in and around buildings.</p>	<p>Part H of the Building Regulations specifically covers drainage. It strongly recommends a more sustainable approach to surface water management with a hierarchy that suggests disposal to watercourses and sewers is the last resort.</p>
<p><b>The Code for Sustainable Homes</b></p>	<p>Produced by the Department for Communities and Local Government, the Code for Sustainable Homes is the national standard for the sustainable design and construction of new homes.</p>	<p>The code is not mandatory, but under certain circumstances it can be required; where Local Authorities stipulate a requirement in their local plans, or where affordable housing is funded by the Homes and Community Agency, who require homes to be built to Code Level 3. The code is configured into a number of categories and issues, with Category 4: Surface water run-off having two issues: Sur 1 – which deals with the management of surface water run-off from developments, and Sur 2 – which deals with flood risk.</p>
<p><b>Surface Water Management Plans</b></p>	<p>The 2007 floods highlighted the need for better planning and management of surface water flood risks. Government have decided that county council and unitary authorities should lead and coordinate the production of Surface Water Management Plans (SWMPs) that consider flood risk from surface water, groundwater and ordinary watercourses.</p> <p>SWMPs will underpin in taking the lead on managing flooding from surface runoff, as well as groundwater and ordinary watercourses where relevant. The plan includes an assessment of flood risk from these sources and a programme of actions to manage these risks. SWMPs will help county councils and unitary authorities, plus their supporting partners understand and manage local flood risk.</p>	<p>Consistency with local Surface Water Management Plans</p>

	<p>They will help put in place:</p> <ul style="list-style-type: none"> <li>• coordinated and prioritised investment strategies and asset management;</li> <li>• support for greater use of Sustainable Drainage Systems (SuDS) to help avoid large investments in unsustainable hard infrastructure;</li> <li>• design approaches that avoid and reduce flood risk to and from new development;</li> <li>• information to improve emergency planning decisions for local authorities and awareness of surface water flooding when preparing for emergencies.</li> </ul>	
<p><b>Guidance on producing Preliminary Flood Risk Assessments</b></p>	<p>To provide information to help Lead Local Flood Authorities to meet duties to prepare Preliminary Flood Risk Assessments, as required by the Flood Risk Regulations 2009.</p>	<p>Reflect the Guidance.</p>



Climate Change and the Historic Environment 2008	Provides an overview of climate change impacts on the historic environment and of the impacts associated with responses to climate change.	Impacts on heritage assets and the wider historic environment.
<b>SEA, SA and the historic environment 2013</b>	To ensure that the historic environment continues to be enjoyed for future generations	Impacts on heritage assets and the wider historic environment.
Seeing History in the View 2011	Explains how the heritage significance of views can be assessed in a systematic and consistent way however these views have come into being.	Impacts on heritage assets and the wider historic environment.
Streets for All 2004	Shows how public realm upgrades can be designed to be appropriate to and enhance the historic environment.	Impacts on heritage assets and the wider historic environment.
National Adaption Programme – Making the country resilient to a changing climate (Defra, 2013)	Response to climate change impacts predicted in the UK Climate Change Risk Assessment. Setting objectives, policies and proposals addressing risks identified. Structured around six different themes: <ul style="list-style-type: none"> <li>• Built Environment;</li> <li>• Infrastructure;</li> <li>• Healthy and Resilient Communities;</li> <li>• Agriculture and Forestry;</li> <li>• Natural Environment; and</li> <li>• Business and Local Government.</li> </ul>	Effects of climate change upon varying themes.
UK Climate Change Risk Assessment : Government Report (Defra, 2012)	Outlines the UK Government's views on the main issues raised in the Climate Change Risk Assessment (CCRA) Evidence Report, to highlight actions already in place to manage the risks identified in the CCRA, and to outline UK Government plans for the future. The report sets out the main risks and opportunities for the UK, arising from climate change, over the coming years.	Key issues of climate change.
National Flood Emergency Framework for England (Defra, 2011)	This Framework sets out the Government's strategic approach to achieving the aims listed below and is intended for use by all those involved in planning for and responding to flooding from:	Planning and Responding to Flooding.

	<ul style="list-style-type: none"> <li>• the sea;</li> <li>• rivers;</li> <li>• surface water;</li> <li>• groundwater; and</li> <li>• reservoirs.</li> </ul>	
Our River Habitats – River Habitats in the Thames River Basin District: Current State and Character (EA, 2010)	Assessment of the current state and character of physical habitat quality for rivers and streams in Thames River Basin District. Report focusses on modification to river banks and channel, shading by riverside trees and extent of invasive plant specifications. The report is one in a series of reports presenting data from the River Habitat Survey (RHS) baseline survey carried out across England and Wales in 2007-08.	Management of river environments in the Thames River Basin.
Working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2010)	This document illustrates how flood and coastal erosion risk management can work more with natural processes. It defines what is meant by this and outlines the key policy reasons why this should happen. It describes a broad range of techniques for working with natural processes in all areas of a catchment – upland, lowland, urban, rural, and coastal. Case studies are provided that illustrate where these techniques have already been used.	Natural processes to mitigate and minimise erosion and flooding.
Greater working with Natural Processes to Manage Flood and Coastal Erosion Risk (EA, 2012)	Produced in response to Sir Michael's Pitt's recommendation that Defra, the Environment Agency and Natural England should work with partners to establish a programme through Catchment Flood Management Plans and Shoreline Management Plans to achieve greater working with natural processes.	Natural processes to mitigate and minimise erosion and flooding.
<b>London</b>		
The London Plan <b>2011</b>	Strategic policies for spatial planning and development across London to ensure the city develops in a sustainable manner.	General conformity with the London Plan.

The Mayor's Air Quality Strategy 2010	Concentrates on policies to promote healthy living and sets out measures to tackle London's air quality problem.	Improve air quality.
The Mayor's Economic Development Strategy 2010	Sets out to encourage the expansion of opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life.	Encourage sustainable economic growth.
<b>London</b> Biodiversity Action Plan	Sets policies and proposals to protect and care for London's biodiversity by encouraging the greening of the built environment and the use of open spaces in ecologically sensitive ways.	Protect and enhance biodiversity.
The Mayor's Cultural Strategy 2010	Sets out the Mayor's proposals for developing and promoting cultural life in London.	Ensure the enhancement of cultural and social growth.
London Climate Change Adaptation Strategy <b>2011</b>	Presents adaptation measures to address climate change within London.	Reducing the impacts and adapting to the effects of climate change.
The Mayor's Transport Strategy 2010	Details priority areas for transport that directly or indirectly benefit the environment and the London community.	Reduce the need for car travel and encourage sustainable modes of transport.
Mayor of London's Municipal Waste Management Strategy <b>2011</b>	Reduce London's waste generation by 2020 and sustainably manage the waste created.	Reduce waste generation.
Mayor's Ambient Noise Strategy <b>2004</b>	Minimise the adverse impacts of noise on people living, working and visiting London, using the best available practises and technology.	Mitigation or avoidance of noise impacts.
<b>The</b> London Housing Strategy 2014	Raise aspirations and promote opportunity: by producing affordable homes, particularly for families, and by increasing opportunities for home ownership; Improve homes and transform neighbourhoods: by improving design quality, by greening homes, by promoting successful, strong and mixed communities and by tackling empty homes.	Quality and affordability of housing supply.
London Tree and Woodland Framework <b>2005</b>	Plant the right trees in the right places to enhance the environment and quality of life.	Protect and enhance trees.
London View Management Framework SPG <b>2012</b>	New development needs to comply with appropriate viewing corridors that are located both within and across the borough.	Maintain and enhance the quality of the townscape.

The London Rivers Action Plan <b>2009</b>	Restoration of rivers and implementation of London Plan Blue Ribbon policies.	River restoration, access to rivers, acknowledgement of the positive role rivers and river restoration play in biodiversity, climate change and flood risk management.
<b>The Mayor's Best Practice Guidance on Health Issues in Planning 2007</b>	BPG promotes the Mayor's statutory duty to promote the health of Londoners. The guide helps boroughs tackle health inequalities and promote healthy developments. Helps Local Authorities to meet their obligations to promote wellbeing in their boroughs.	Appraise health and seek to reduce health inequalities.
<b>Sustainable Design and Construction SPG 2014</b>	The SPG seeks to ensure future developments meet the highest standards of sustainable design and construction.	The sustainable use of natural resources and reduced impact of climate change through energy efficient design and construction.
<b>Accessible London: Achieving an inclusive environment SPG 2014</b>	The SPG seeks to ensure the promotion of an inclusive accessible environment	Accessibility for all and inclusivity.
<b>East London Green Grid Framework SPG 2008</b>	The SPG seeks to promote the concept of green and blue infrastructure and increase its delivery.	Accessible open space and access for all.
Shaping Neighbourhoods Character and Context <b>SPG 2013</b>	The Mayor has published for public consultation draft Supplementary Planning Guidance on 'Shaping Neighbourhoods: Character and Context' to help with the implementation of policies in Chapter 7 of the 2011 London Plan, particularly Policies 7.4 on Local Character and 7.1 on Building London's Neighbourhoods and Communities.	Understand character and local context to identify how a place should develop.
London Planning Statement <b>SPG 2014</b>	The Mayor has published for public consultation a draft 'London Planning Statement' as proposed London Plan Supplementary Planning Guidance. This is intended to fill the gap left by the Government's revocation of the former Government Office for London Circular 1/2008 by pulling together information about the Mayor's role in the London Planning system.	Propriety (in compliance with legal requirements regarding procedural fairness and propriety, and ensuring that decisions are properly based on relevant planning considerations); Promoting Sustainable Growth; and Viability (of development).

<b>East London Strategic Flood Risk Assessment</b>	To inform the future strategic planning of East London, ensuring that flood risk is considered in determining the type, location and design of development at a strategic scale.	Reflect the results of the assessment.
<b>Regional Flood Risk Appraisal for the London Plan</b>	To inform policies relating to flood risk in the London Plan.	Consider in relation to planning for the development in areas at risk from flooding.



Housing in London 2014	Housing in London is the evidence base for the Mayor's London Housing Strategy. The Mayor formally adopted his London Housing Strategy in February 2010 and in December 2011 he consulted on proposals for a new Strategy.	Demographic pressures, housing affordability, the housing market, mobility and housing need, housing supply, decent housing, energy efficiency and fuel poverty.
All London Green Grid 2012	The All London Green Grid takes the principles of the East London Green Grid and applies them across London.	Integrated network of green and open spaces together with the Blue Ribbon Network of rivers and waterways.
London's Foundations 2012	Sets out London's geological heritage, explaining the process for identifying sites of national, regional and local geological importance, identifying important geological sites for protection and advising boroughs on how to promote as well as protect geodiversity.	Impacts on heritage assets and the wider historic environment.
London Catchment Abstraction Management Strategy 2013	To help make sure water resources are safeguarded despite the increasing pressures on water availability from climate change and population growth.  To make sure catchment management is integrated so that impacts on water resources and the water environment are managed together.	CAMS uses the Environmental Flow Indicator (EFI) to help identify where the amount of water abstracted or licensed exceeds the available water in a catchment.
Lewisham		
<b>Lewisham Site Allocations Local Plan 2013</b>	Identifies, designates and safeguards land for a particular use.	Inform site allocations in areas at risk from flooding.
<b>Lewisham Town Centre Local Plan 2014</b>	Policies and proposals for development in Lewisham town centre	Inform development in Lewisham town centre which relates to the borough's rivers.

Lewisham Sustainable Community Strategy 2008-2020	The strategy looks ahead to 2020 and explores how Lewisham will change and develop over this period. It identifies the key challenges and opportunities that the borough and our citizens will face and looks at how we can ensure that everyone can benefit from the changes the future will bring.	Improve social, environmental and economic outcomes for the borough.
Lewisham Core Strategy 2011	The Core Strategy provides the spatial planning framework for the borough and is underpinned by five strategic objectives: <ul style="list-style-type: none"> <li>• Regeneration and growth areas;</li> <li>• Providing new homes;</li> <li>• Growing the local economy;</li> <li>• Environmental management;</li> <li>• Building a sustainable community.</li> </ul>	Avoid, and secondarily minimise and compensate for, any significant negative effects on the community, in social and economic terms, or the environment.
<b>Safer Lewisham Strategy 2011 - 2014</b>	Sets out the results of the Strategic Assessment which identifies the key crime and disorder issues that face the borough, and the multi-agency actions that will be deployed to address them.	Reduce crime and the fear of crime.
<b>Lewisham Development Management Local Plan 2014</b>	Sets out planning policies to guide decisions on planning applications	Improve social, environmental and economic outcomes for the borough.
Lewisham Regeneration Strategy 2008-2020	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy complements the SCS.	Ensure the sustainable development of the borough.
Lewisham Housing Strategy 2009 -2014	Focuses on delivering the right housing mix to meet the housing needs and aspirations of all the borough's residents and achieving the wider goals expressed within the SCS.	Provide sufficient housing of appropriate quality, mix and tenure.
Lewisham Municipal Waste Strategy <b>2008</b>	The Strategy aims to minimise Lewisham's annual growth in waste.	Minimise growth in waste.

Lewisham Children and Young People's Plan <b>2012 - 2015</b>	The Plan focuses on implementing actions to improve a number of key outcomes for children and young people which will improve their lives and life chances.	Improve life outcomes for residents –promotion of education, employment, housing and leisure and community facilities.
Lewisham Carbon Reduction and Climate Change Strategy 2008	The Strategy is based on achieving a lasting and sustained decrease in emissions of CO2 working with strategic partners and with citizens to: <ul style="list-style-type: none"> <li>• reduce demand for energy;</li> <li>• increase energy efficiency;</li> <li>• increase the use of renewable energy;</li> <li>• tackle fuel poverty.</li> </ul>	Reduce the borough's carbon footprint.
<b>Lewisham</b> Social Inclusion Strategy 2005	This strategy centres around five broad themes. It identifies the links between the council's existing strategies and services to enable more joined-up working.	Promote social inclusion, improve urban design, transport and education, and promote health and well-being in the borough.
Healthier Communities – A health and well-being framework for Lewisham <b>2007</b>	The Strategy seeks to improve the health outcomes for Lewisham residents by adopting preventative measures and other innovative approaches.	Enhance the health levels in the borough.
Lewisham Leisure and Open Space Study 2010	This strategy aims to provide: <ul style="list-style-type: none"> <li>• A review of outdoor sport and recreation;</li> <li>• a borough playing pitch strategy;</li> <li>• an implementation plan and prioritised investment;</li> <li>• Plan for the Playing Pitch Strategy.</li> </ul>	Protect and maintain open spaces and biodiversity across the borough.
Lewisham Open Space Strategy 2012 - 2017	The Open Space Strategy is guided by the National Planning Policy Framework March 2012, has taken findings set out in the Lewisham Leisure and Open Spaces Study 2010 (LLOSS) and has built upon the 2005-10 Open Space Strategy.	Protect and maintain open spaces and biodiversity across the borough.
Local Biodiversity Action Plan – A Natural Renaissance For Lewisham <b>2006</b>	The key objective is the protection and enhancement of areas suitable for wildlife in the borough and to increase citizens' access to nature, even in urban areas.	Primarily avoid, and secondarily minimise and compensate for, any significant negative effects upon biodiversity.

Better Futures: Lewisham's Homelessness Prevention Strategy 2009 - 2014	The Strategy complements the objectives of the Lewisham Housing Strategy and seeks to prevent homelessness by providing long term and sustainable housing and promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment.	Ensure measures providing sufficient housing of appropriate quality, mix and tenure and improve access to, and opportunities for, childcare, health, education, training and employment are integrated.
Lewisham Borough Sports Plan 2010	The Strategy provides a vision for sport to increase opportunities to participate in sport at all levels and for all ages	Enhancing the health wellbeing levels in the borough.
Lewisham Local Air Quality Action Plan 2008	The key aim is to bring about change to reduce emissions (NO2 and PM10) from main source of pollution (road transport) in a cost-effective and proportionate way through Area Quality Management Areas (AQMA) with designated geographical boundaries.	Improve air quality. Promote land uses and activities with minimal impacts on air quality.
Lewisham Strategic Flood Risk Assessment 2015	The study identifies and provides advice to the Council on the suitability of development in areas at varying risks of flooding across the borough.	Minimise and mitigate the risk of flooding in the borough.
Lewisham Flood Risk and Development Sequential Test 2009	The sequential test identifies potential development sites and steers development to areas at lowest flood risk. Where there are no reasonable alternative sites in an area of lower flood risk, authorities must ensure that measures are incorporated that render the proposed development's vulnerability to flooding appropriate to the probability of flooding in the area.	Minimise and mitigate the risk of flooding in the borough.
Lewisham Local Implementation Plan 2011 - 2031	The LIP is a statutory plan to implement the London Mayor's Transport Strategy.	Seek a reduction car travel and increase sustainable transport.
Lewisham Strategic Housing Market Assessment 2008	The SHMA assesses housing provision and need within the borough and the five south east London boroughs. It outlines recommendations for the level of affordable housing and tenure mix, and identifies areas as well as specific groups within the borough and sub-region who may have different housing requirements.	Seek to facilitate housing provision, including its mix and tenure, and to ensure decent homes for all.

<b>Lewisham Health and Wellbeing Strategy 2013</b>	Identifies key themes for action aimed at improving long-term health and influence the long-term commissioning priorities of health infrastructure providers in the borough.	Seek to improve the health and well-being of the borough's residents.
Lewisham Conservation Area Management Plans	Provides guidance for the management of the borough's conservation areas.	Impacts on heritage assets and the wider historic environment.
Lewisham Borough Wide Character Study 2010	The character study provides a description of the physical form of the borough, its origins, places, streets and buildings to provide an understanding of the particular attributes of the London Borough of Lewisham.	Impacts on the character of the borough.
Healthy Weight Healthy Lives (PCT with LB Lewisham) 2009	The strategy is linked in to the Children and Young People's plan and is a partnership strategy to promote healthy weight and lives in children, young people and their families.	Improve the health and wellbeing of the population and reduce inequalities in health.
<b>Lewisham Cultural Strategy 2009 - 2013</b>	Vision of Lewisham as a visually exciting, creative and imaginative hub, with a synthesis between urban design, arts, culture and the economy.	Promote a vibrant and dynamic borough.
Ravensbourne River Corridor Improvement Plan 2010	This Plan provides this specific guidance for the area of the Ravensbourne corridor that lies within the boundary of the Thames Gateway to especially focus and influence areas of planned growth and investment. However, it should be noted, that the vision and main objectives behind this document as well as the management guidance and good practice examples are valid and need to be considered throughout any development in the borough and further upstream along the Ravensbourne, Pool or Quaggy.	Specific guidance for the Ravensbourne river corridor for Lewisham.
Lewisham Planning Obligations SPD 2011	The LDF Planning Obligations Supplementary Planning Document (SPD) provides greater transparency and openness in the way planning obligations are agreed with developers. The SPD provides specific guidance on:	Planning obligation guidance for Lewisham.

	<ul style="list-style-type: none"> <li>• circumstances when obligations will be secured;</li> <li>• the type, range and scale of contributions for affordable housing, education, health, leisure and community facilities;</li> <li>• open space, transport and public realm infrastructure;</li> <li>• infrastructure for flood alleviation; and</li> <li>• renewable energy required as a result of new development.</li> </ul>	
Lewisham Bromley Road SPD 2009	The LDF Bromley Road, Southend Village Supplementary Planning Document (SPD) provides guidance for future development as well as a starting point for any future locality based regeneration in the area.	Guidance for further development along Bromley Road and Southend Village.

Appendix B

Baseline Information

## 1. Climate

### Carbon emissions and energy consumption

There is a consensus among experts that human activities are contributing to climate change through the release of greenhouse gases into the atmosphere. This has implications for the way we use and manage resources, particularly the future supply, availability and use of energy. The built environment, and the way people use their environment, contributes to greenhouse gas emissions and therefore sustainable development plays a critical role in tackling climate change. The full effects of climate change are unknown but climate risks which are expected to intensify in London over the coming decades include flooding, higher and unseasonal temperatures, urban heat island effect and limited water resources including drought, all impacting our quality of life.<sup>1</sup>

A significant contributor to climate change is the concentration of carbon dioxide (CO<sub>2</sub>) in the atmosphere. According to the Department for Energy and Climate Change (2011) the total CO<sub>2</sub> emissions for Lewisham between 2005 and 2009 are reducing annually and the per capita reduction rate is at 17.4% since 2005. This is shown on Table A1. The figure exceeds the target of 8.5% set by the Council. The total CO<sub>2</sub> emission in Lewisham is 998,000 tonnes and contributed 2.35% of London's total CO<sub>2</sub> emissions. The largest source of emissions is from the domestic sector followed by road transport. At just 3.8 tonnes per person, Lewisham has the lowest per capita carbon emissions in inner London, the second lowest in the capital as a whole (after Redbridge) and the fourth lowest in the UK. There has been a decrease in London's per capita emissions falling by 12.7% from 6.3 tonnes person to 5.5 tonnes.

#### Annual CO<sub>2</sub> emissions (tonnes) in Lewisham 2005 to 2009

Lewisham	Industry and commercial	Domestic	Road Transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	315	581	282	1,180	254	4.6	17.4
2006	316	572	277	1,166	257	4.5	
2007	306	556	278	1,141	259	4.4	
2008	264	556	267	1,088	262	4.2	
2009	239	500	258	998	265	3.8	

Source: DECC, 2011

#### Annual CO<sub>2</sub> emissions (tonnes) in Greater London 2005 to 2009

Greater London	Industry and commercial	Domestic	Road transport	Total	Population ('000s, mid-year estimate)	Per capita emissions (t)	Per capita reduction since 2005 (%)
2005	20,389	17,291	9,239	46,966	7,485	6.3	12.7
2006	21,738	17,193	9,114	48,089	7,547	6.4	
2007	20,977	16,807	9,050	46,876	7,602	6.2	
2008	21,157	16,865	8,664	46,726	7,668	6.1	
2009	18,752	15,232	8,419	42,441	7,753	5.5	

Source: DECC, 2011

<sup>1</sup> Where temperatures in urban areas, particularly at night are warmer than non-urban areas

The GLA notes that by far the largest contributor to domestic emissions is space heating and cooling, which produce three times as many emissions as either water heating or appliances, and ten times as many as lighting.<sup>2</sup> It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO<sub>2</sub> identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels.

The emissions for Lewisham reflect its small industrial and commercial base and predominantly residential character with older properties, and its limited Underground services. The Greater London Authority notes that by far the largest contributor to domestic emissions is space heating and cooling, which produce three times as many emissions as either water heating or appliances, and ten times as many as lighting.<sup>3</sup> It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO<sub>2</sub> identified in the London Climate Change Adaptation Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels. The percentage of homes that do not meet decent homes standards in the borough is reducing; however there is still a need to improve this.

The Council is proactively working to address climate change issues. The borough was awarded Beacon Status in 2005/06 for work on sustainable energy and has a wide variety of programmes aimed at energy efficiency and reducing CO<sub>2</sub> emissions. To implement its goals the Council has a Corporate Sustainability Board and in July 2008 published a Carbon Reduction and Climate Change Strategy to ensure it leads by example on energy efficiency. The Council's ambition is for Lewisham to play a leading role in responding to climate change locally, regionally and nationally with the aim of achieving the lowest amount per capita CO<sub>2</sub> emissions in London. Any future residential development will need to meet Code for Sustainable Homes Level 4 or higher. Level 4 will provide greater energy efficiency (heating and cooling) as well as water efficiency features to improve biodiversity such as a green/living roof.

## 2. Air

There are five air quality management areas (AQMAs) in the borough, located where the level of pollutants is higher than the acceptable threshold. National Air Quality Objective (NAQO) for nitrogen dioxide (NO<sub>2</sub>) is set at 40µg/m<sup>3</sup> as an annual average. In urban areas, this is the most difficult target to meet. Road traffic is the main source of air pollution in the borough. Excessive road traffic, which affects areas of poor air quality, is considered to be one of the main modern 'environmental stress' factors.

Exposure to higher levels than 40µg/m<sup>3</sup> is most likely to affect those who have a pre-existing respiratory illness as it causes irritation of the nose, throat and airways. However, the objectives do not necessarily represent 'safe' levels and it is agreed that authorities should continue to work to improve air quality and not just aim to meet the targets.

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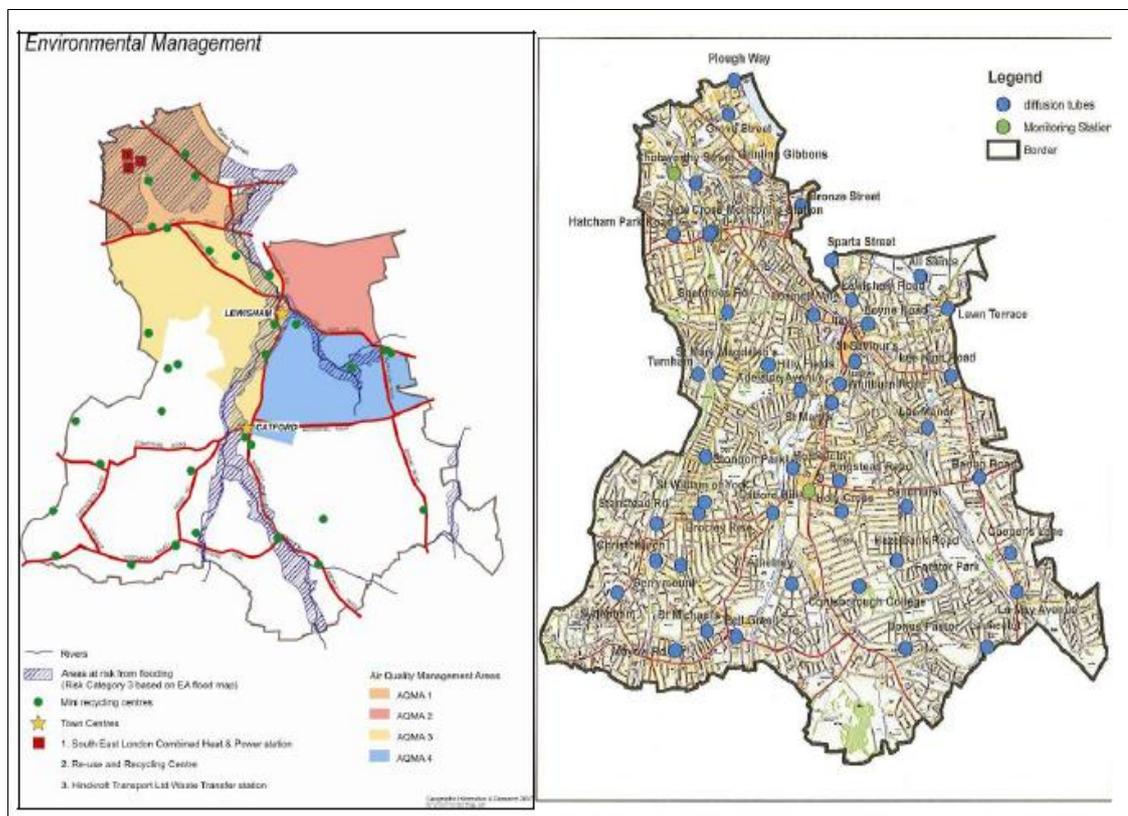
<sup>2</sup> Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2007

<sup>3</sup> Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2007

The borough's air quality will remain an important issue that needs to be addressed. The Council adopted an Air Quality Action Plan in 2008. The focus of which is mainly concerned with reducing emissions from road transport, with an emphasis on balancing supply side measures, such as improved walking, cycling and public transport, and demand side management, such as traffic restraint and regulation. The implementation of the London Low Emission Zone is expected to have the highest benefit in improving air quality within Lewisham AQMAs.

The Council's fourth review and assessment (Updating and Screening Assessment) of air quality was conducted in June 2009. There is a risk of the annual mean objective being exceeded for nitrogen dioxide and for particles PM10. The Detailed Assessment concluded that the Council should maintain the designated AQMAs and continue the programme of monitoring which was expanded in 2010 to measure PM10 in a location where fugitive sources were believed to be an issue.<sup>4</sup>

### Air Quality Management Areas in Lewisham and Monitoring Stations



The Environment Agency regulates a number of waste sites within the borough of Lewisham, the majority of which are located in the Deptford area. Within the Deptford location Mercury Way is a priority for air quality for Lewisham Borough Council and the Environment Agency works in partnership with Lewisham to monitor air quality here and ensure sites we regulate are not having an adverse effect on air quality.

<sup>4</sup> Air Quality Action Plan 2008

On Mercury Way there are two waste transfer stations regulated by the Environment Agency and these sites primarily deal with construction and demolition wastes. In terms of air quality it is the role of the regulating officer to ensure appropriate measures are being used to control emissions and in particular dust. If appropriate measures are not being utilised by operators then it is the role of the Environment Agency to take appropriate enforcement action.

PM10 particulate pollution levels recorded at the Lewisham 3 air quality monitor (Mercury Way) historically have been and are currently below the Government's Air Quality Strategy Objectives.

The Environment Agency has been working in close partnership with the London Borough of Lewisham to resolve the issues at the Deptford sites and will continue to share information following site visits.

### 3. Biodiversity, flora and fauna

Lewisham's natural heritage has helped shape the borough's development and continues to be a reason why people choose to live and work here. Names such as Lee Green, Grove Park and Forest Hill give an idea of the landscape from which Lewisham developed. Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields.

Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. Lewisham is one of the greenest parts of south-east London with over a fifth of the borough being parkland or open space.<sup>5</sup> Areas of parkland and open space play an important environmental role, contributing to biodiversity within the borough.

The Stag Beetle is the largest beetle in the UK, is threatened at the global level and has undergone significant decline in the past 40 years. Recent surveys indicate south London is a national hotspot and in Lewisham they can be found throughout the borough. They require suitable dead wood for their survival and management of this resource is a key priority for land managers.

Within the borough of Lewisham there are 60 sites designated as Sites of Nature Conservation Importance (SNCI) including 19 Local Nature Reserves (LNR). In addition, the council has 21 nature conservation areas directly under ecological management, each with its own unique features.<sup>6</sup> The River Thames and other waterways, private garden areas, and railway line-sides also provide valuable habitats for wildlife in the borough.<sup>7</sup> Invasive plants associated with the watercourse are present along the Ravensbourne and this is an area in which improvement and future prevention/protection will be important for the biodiversity of the watercourse.

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<sup>5</sup> Lewisham Leisure and Open Space Study 2009

<sup>6</sup> Core Strategy 2011

<sup>7</sup> Core Strategy 2011

#### 4. Soil

The solid geology of Lewisham is predominantly marine London Clay in the central and southern sections of the borough, with a pocket of Lambeth Group clay in the south and a number of pockets in the north. Towards the north of the borough there are also pockets of chalk (Upper Chalk and Chalk Group) and sand (Thanet Sand Formation). In the north east and south / south eastern sections of the borough there are also pockets of Harwich Formation sand and gravels.<sup>8</sup>

The drift deposits are concentrated in the north and central sections of the borough, with alluvium in the vicinity of the River Thames and along the River Ravensbourne valley. Gravels of the Kempton Park Gravel Formation can generally be found adjacent to the alluvial deposits. In addition, there is a pocket of Langley Silt

Formation deposits in the north west of the borough and pockets of Head (Clay) in the south of the borough.<sup>9</sup> The borough is characterised by slowly permeable soils which are seasonally wet and slightly acid but base rich loamy and clayey in texture. Along the river corridors, and specifically in the locality of Catford town centre, the soils are loamy with naturally high groundwater.<sup>10</sup>

There are currently no entries recorded in Lewisham's Contaminated Land Register.<sup>11</sup> This should not however, be interpreted that the land is necessarily free of contamination.

#### 5. Water

##### Flood zones

The London Borough of Lewisham has some land within flood zones 2 and 3. Flood zone 2 represents the 1 in 1000 year probability of flooding, and flood zone 3 represents the 1 in 100 year probability of flooding. The area of land within flood zones 2 and 3 is predominantly around in the North of the Borough, where the risk is tidal flooding from the Thames. Other areas include the land around the river Ravensbourne and river Pool, extending to the south of the Borough and the Quaggy, extending towards the east of the Borough. In Lewisham there are approximately 21,000 properties at risk of flooding from river and tidal sources. This equates to 16% of all properties in the Borough. For the properties at risk of flooding, 8% are classified as having a significant likelihood of flooding, compared to 83% which are classified as having a low likelihood of flooding. The remainder have a moderate likelihood of flooding. Potential risk of flooding from other (non river related) sources also exists including possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies. With changing climate patterns, it is expected that intense storms will become increasingly common and those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years.<sup>12</sup>

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<sup>8</sup> London Borough of Lewisham, 2010: Contaminated Land Inspection Strategy, prepared by the Environmental Protection Group.

<sup>9</sup> Contaminated Land Inspection Strategy, 2010.

<sup>10</sup> National Soil Resources Institute (NSRI) Soilscales website <http://www.cranfield.ac.uk/sas/nsri/>

<sup>11</sup> Lewisham Borough Council website: [www.lewisham.gov.uk](http://www.lewisham.gov.uk)

<sup>12</sup> SFRA

## Water Framework Directive

The Water Framework Directive is European legislation designed to protect and enhance the quality of our rivers, lakes, streams, groundwater, estuaries and coastal waters, with a particular focus on ecology. The Environment Agency is the lead authority on the WFD in England and Wales. We are required to plan and deliver actions that will improve our water environment. There are three watercourses in Lewisham designated under the WFD, The River Pool, Quaggy and Ravensbourne. Under the WFD, these need to achieve good ecological potential by 2027. A programme of measures to improve the status is being developed. This will include a series of measures to address urban diffuse pollution in some parts of London, in order to achieve the 'good' ecological status required for the Directive.

## Water Quality: Chemical Water Quality

The WFD provides a sophisticated way of addressing the whole water environment which will help to direct action to where it is most needed. Over 30 measures are grouped by ecological status (including biology, in addition to elements like phosphorous and pH) and chemical status (priority substances). Assessments and actions are ongoing. The ongoing work includes identifying possible actions which would support the waterbodies in Lewisham in reaching WFD standards. The data will inform the Sustainability Appraisal of Lewisham RCIP when it is available.

## Householder Water Use

All of Lewisham falls in Thames Water's London resource zone, where average consumption in 2009-10 was 167 litres per person per day.<sup>13</sup> This compares to the five year average for the Borough of 160.4 litres consumed per person per day between 2005/06 and 2009/10. This water resource zone (WRZ) is seriously water stressed. The Government has set a target for households to achieve 130 litres per person per day, which will require changes to consumption patterns in order to meet it. Through the Code for Sustainable Homes, any future residential development in Lewisham will need to meet Code for Sustainable Homes Level 4. Level 4 will provide greater water efficiency features to encourage sustainable consumption of drinking water within buildings and external watering/irrigation.

Map 2 shows the geology of the CAMS area.

Confined Chalk underneath London is designated as a principal aquifer. The groundwater flow within this water body is drawn towards central London. The source of this groundwater comes from the unconfined areas upstream, mainly outside the London CAMS catchment.

The major pressure in the London CAMS area is the population growth resulting in requirements for new housing and increased demand for water for domestic and business use. In recent years, we have observed a dramatic rise in the groundwater heating and cooling schemes in response to policies on reducing carbon dioxide emissions. These schemes are particularly popular in central London.

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<sup>13</sup> Thames Water, 2010. Thames Water revised Water Resources Management Plan

The following stretches of river within the Ravensbourne catchment fall within several Source Protection Zones for public water supply boreholes abstracting from the underlying Chalk aquifers:

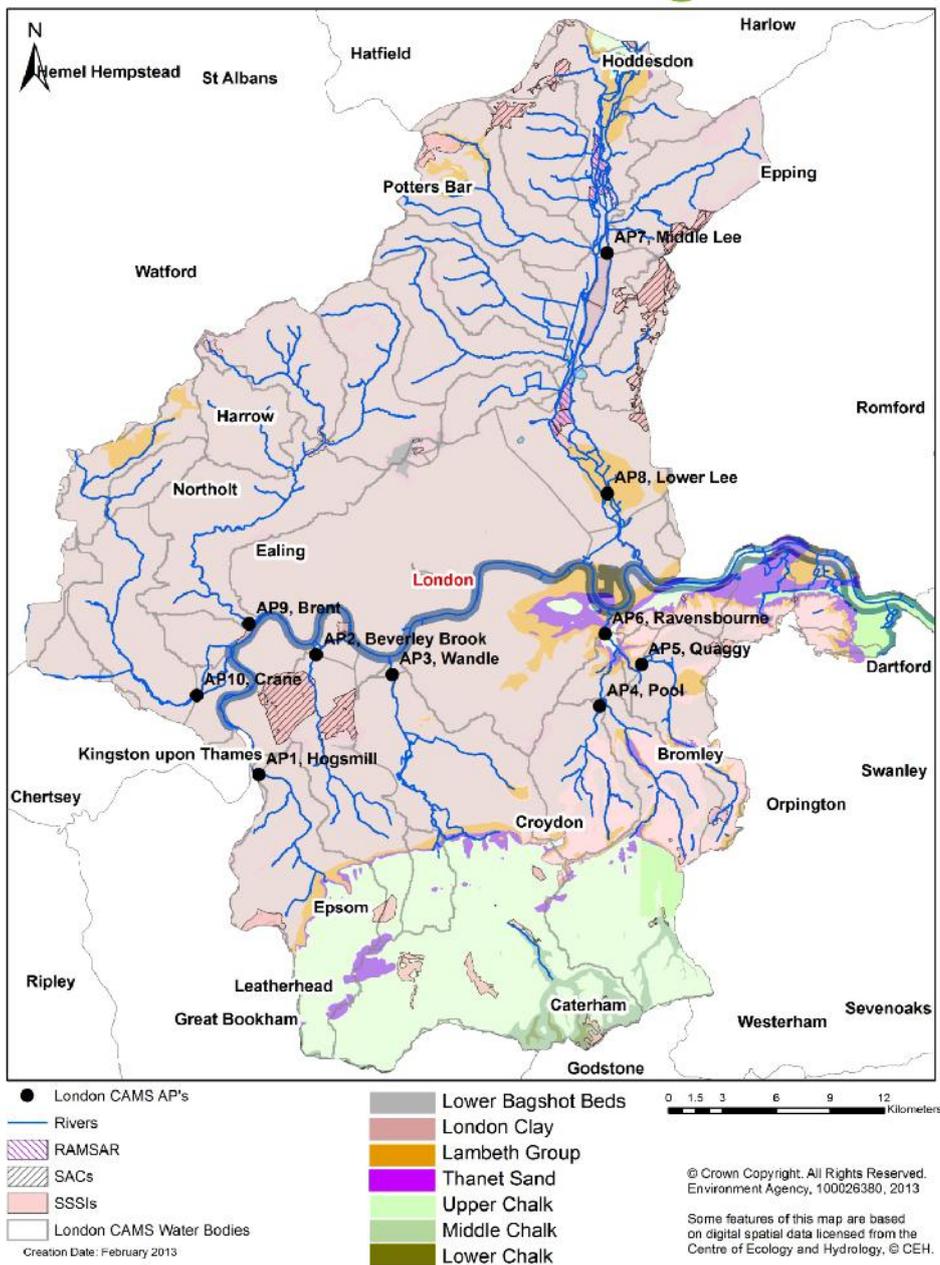
Deptford (alongside the Deptford Creek);

Ladywell Fields, Catford (alongside the River Ravensbourne downstream of the confluence with the Pool River);

Bell Green (alongside the Pool River just upstream of the confluence with the River Ravensbourne);

Shortlands (alongside the River Ravensbourne upstream of the confluence with the Pool River).

### LONDON CAMS Geology & Designated Sites



## 6. Population and human health

### Population

The population of the London Borough of Lewisham was 275,885 at the 2011 census. The population of Lewisham grew by 3% between 2001 and 2011. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031.<sup>14</sup> Children and young people (0 to 19 years) make up over a quarter of the population, one of the highest proportions in London.<sup>15</sup> Elderly residents (over 75 years) make up just 5%. The average age of our population is 34.7 years and is young when compared with other London boroughs. Population growth and an increase in the number of households is expected to be concentrated within the Evelyn, New Cross and Lewisham Central wards. This is due in part to the major development and regeneration plans such as Convoys Wharf and within the Lewisham Town Centre. In terms of life expectancy for the borough's population, between 2005 and 2007 the average life expectancy at birth for men in Lewisham was 76 years, compared with 77.3 years in England; and over the same period the life expectancy for women was 80.8 years in Lewisham compared with 81.5 years in England.<sup>16</sup> The population was more or less evenly split between males and females and these proportions are not expected to change in the period to 2014.<sup>17</sup>

There was a growth in all groups of the black and minority ethnic (BME) population between the 2001 and the 2011 Census. This has risen from 39% of households to 58.5%, who largely live in the northern and central parts of the borough.<sup>18</sup> The general level of health of people in Lewisham is significantly poorer than the health of people in the rest of England. Some indicators of poor health are specifically related to low income such as coronary heart disease, cancer and respiratory disease. Reducing premature mortality from circulatory diseases and cancer remain priorities for Lewisham.<sup>19</sup>

The Index of Deprivation (ID 2010) saw Lewisham ranked as the 31st most deprived local authority in England. This means as a local authority, Lewisham is within the 20% most deprived Local Authorities in the country. In 2007 Lewisham was ranked 39th, so although the current ranking is lower a number of authorities that were within the 20% most deprived nationally, no longer exist. The ID looks at a range of indicators covering income, employment, health, education, training, skills, living conditions and access to services. Figure A2 shows Local Super Output Areas (LSOAs) in Lewisham by national quintile of deprivation. The proportion of LSOAs in the bottom 20% nationally decreased slightly from 2007.

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<sup>14</sup> Greater London Authority 2008 Round of Demographic Projections, RLP High

<sup>15</sup> Census 2011

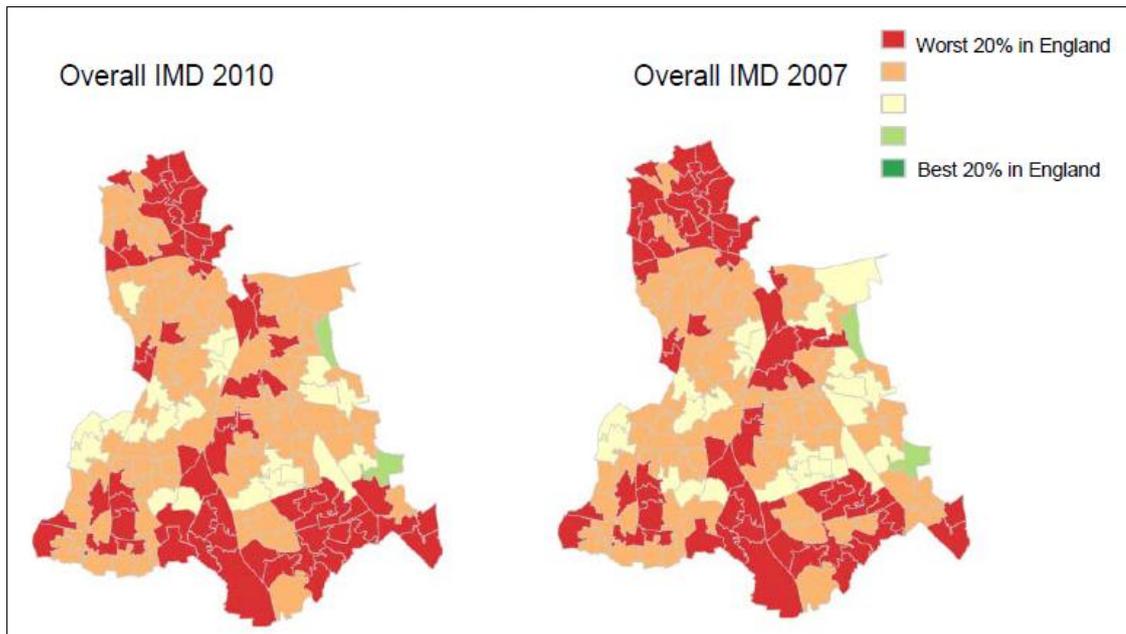
<sup>16</sup> JSNA, NHS London

<sup>17</sup> Male 49% and female 51%.

<sup>18</sup> BME population estimated at 49.4% of households as evidenced through the Lewisham Household Survey 2007 for the Strategic Housing Market Assessment (SHMA)

<sup>19</sup> Joint Strategic Needs Assessment (JSNA), NHS Lewisham

## Overall deprivation (combined deprivation score)



Of Lewisham's 166 LSOAs 38% were in the 20% most deprived in England, compared with 38.6% in 2007 and 33% in 2004. Only five of these LSOAs were within the worst 10% (there were eight in 2007); they are dispersed across the wards of Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot. However, 58 of Lewisham's LSOAs were in the bottom 10-20% (up two from 2007); making a total of 63 LSOAs in the bottom 20%.

With nearly 40% of Lewisham's LSOAs in the bottom 20%, and almost all of the remaining LSOAs being in the bottom 50%, the ID results again suggest that Lewisham faces some significant challenges. Care must be taken not to assume that 'less deprived' means 'wealthier' as the indices measure only levels of deprivation, not affluence. In addition, it is important to recognise that even in LSOAs with little deprivation there may be individuals and families experiencing deprivation. These people will also need to access support and services aimed at tackling deprivation.

### 7. Material assets

#### Homes

Continuous growth in population and high demand for housing and affordability

The population is forecast to rise. The Mayor of London requires 10,050 new residential units to be built in Lewisham by 2021. The average income of the majority of households is insufficient to buy a house. The SE London and Lewisham Strategic Housing Market Assessments highlight that access to affordable housing remains an issue throughout the borough. Based on the GLA Housing Price 2008 data, the housing price in Lewisham has increased steadily over the last five years. However, it is still lower than the London average price (£249,789 compared to £297,785).<sup>20</sup> This is particularly relevant given that the Lewisham Household Survey for the SHMA asked a question about household income. This included gross household income

<sup>20</sup> Land Registry, March 2009

from all sources such as earnings, pensions, interest on savings, rent from property and state benefits. While just under a fifth of households have an income of over £40,000, however nearly half of all households have an income of less than £15,000.<sup>21</sup>

### Existing dwelling stock

Of the total dwelling stock, 54% of properties in Lewisham are flats of which nearly half are converted dwellings rather than purpose built. Of the remainder 34% are terraced houses and 12% are detached or semi-detached.<sup>22</sup> In terms of bedroom size, 27% of properties are 1 bedroom, 33% 2 bedroom and 30% 3 bedroom. This leaves 10% with 4 or more bedrooms.

A dramatic change has taken place in the tenure of property in the London borough of Lewisham in the past few years. This provides a roughly equal tenure split between private rent, social rent and private ownership. It is considered that the increase in the private rented sector is a result of the buy-to-let market in recent years. The amount of private rented properties has increased from 14.3% in 2001 to 24.3% in 2011. Conversely social rented properties have fallen from 35.6% in 2001 to 31.1% in 2011, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 42.4% in 2011.<sup>23</sup>

A total of 33,922 households were assessed as living in unsuitable housing due to one or more factors.<sup>24</sup> The largest reason was overcrowding (11,482 households), and major disrepair or unfitness (10,641); followed by support needs, accommodation too expensive and sharing facilities (6,151, 5,263, and 4,487 respectively). Deptford is one area in the borough most likely to contain unsuitably housed households which corresponds to areas identified with higher levels of deprivation.<sup>25</sup>

## 8. Cultural heritage

The complex historical development of the borough has left a legacy of distinctive neighbourhoods. In acknowledgement of this distinctive heritage a substantial portion of the borough is identified as an Archaeological Priority Area. An archaeological priority area is an area specified by Local Planning Authorities to help protect archaeological remains that might be affected by development. This means that any redevelopment in these areas that might reveal remains of interest will be required to undertake an assessment and preservation in accordance with advice from English Heritage.

Today the borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. These open spaces have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets. For example, the open character of Blackheath is an integral element of the Blackheath Conservation Area

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<sup>21</sup> 48%

<sup>22</sup> Lewisham Household Survey 2007, SHMA 2008

<sup>23</sup> Lewisham Household Survey 2007, SHMA 2008, 2011 Census

<sup>24</sup> Lewisham Household Survey 2007, SHMA 2008, 2011 Census

<sup>25</sup> Lewisham Household Survey 2007, SHMA 2008, 2011 Census

and a supporting element to the outstanding universal value of the Maritime Greenwich World Heritage Site. The small area of open space within the Culverley Green Conservation Area provides a welcome element of informality to the grid pattern of tree lined streets

Lewisham has around 27 conservation areas covering 707 ha of the borough, around 540 nationally-listed buildings, over 200 Locally Listed buildings, 2 Registered Parks and Gardens, 21 areas of Archaeological Priority and 1 Scheduled Ancient Monument. Lewisham's open spaces also have historic significance and give the borough a distinct identity. They are an essential component of many heritage assets.

## 9. Landscape

The borough of Lewisham is primarily residential in nature, characterised by 20th century suburbs in the south to older Victorian neighbourhoods in the north. These extensive areas of housing are punctuated with a network of small and large town centres, local shopping parades, employment areas of varying quality and job density, many parks and green spaces, and railway corridors, and are overlaid by a range of heritage assets.

The borough is characterised by a wide variety of green spaces and natural features that provide places for people to enjoy, such as New Cross Gate Cutting, Blackheath, the River Ravensbourne, Beckenham Place Park and Hilly Fields. In fact, Lewisham has more than 560 hectares of green space (about 14% of the area of the borough), with 46 public parks covering about 370 hectares of land. These areas play an important environmental and recreational role as well as defining and continuing to contribute to Lewisham's overall character.

Lewisham is located within the London Basin Natural Area<sup>26</sup> and is defined by an urban / suburban land use according to the Dudley Stamp Land Use inventory.<sup>27</sup> The landscape character of the borough is focused around the Ravensbourne, Quaggy and Pool rivers which flow into Deptford Creek. Elevated views play a significant role in the character of the area. There is a general gradient of development across the borough from oldest in the north to more modern in the south. As London has grown, the borough has seen successive rounds of urbanisation moving south across the borough.<sup>28</sup>

Lewisham also has 37 allotment sites which are very popular with local residents. Because of the current interest in healthy, outdoor living and organic food, all of the sites have waiting lists. No areas within the borough are designated as Greenbelt land. Of the 37 allotment sites within the borough, one relatively small allotment can be found in the Rushey Green ward at the Weavers Estate (0.42 ha).

Compared to a city average of 41%, only 23% of land in the borough of Lewisham is green space or water. Despite having 560 ha of green space, parts of the borough are considered to be deficient in open space, and with increasing pressures to build, the borough aspires to protect all its green space.<sup>29</sup>

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<sup>26</sup> English Nature, 1997: London Basin Natural Area Profile

<sup>27</sup> [www.magic.gov.uk](http://www.magic.gov.uk)

<sup>28</sup> Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

<sup>29</sup> Lewisham Borough Council, May 2011: Development Management Local Plan Sustainability Appraisal Scoping Report

## 10. Waste

Lewisham is a unitary waste authority. Over 80% of Lewisham's waste is diverted away from landfill by incinerating it as the South East London Combined Heat and Power Station (SELCHP), which recovers power to supply to the National Grid. Of the borough's total waste for 2010/11 only 6% was sent to landfill. The borough incinerates 76% of its household waste. Lewisham has on the other hand the lowest recycling and composting rate in London in 2009/10. The overall household recycling and composting rate in Lewisham has steadily between 2000/01 and 2007/08. However, the rate has since declined. The current recycling and composting rate is almost 15% lower than the London total rate of 31.8%.<sup>30</sup>

The Council aims to increase household recycling / composting and in 2010/11 has set a target to recycle compost or reuse 25% of its household waste. Further, targets have been set to landfill 8% of municipal waste by 2010/11 and to reduce household waste per household to 716kg in 2010/11.<sup>31</sup> There is a projected waste growth of 3% per annum, which means that disposing of this increasing amount and variety of waste will become increasingly difficult. Every borough is allocated an apportionment of waste in the London Plan that they must dispose of using appropriate facilities. For Lewisham this equates to approximately 208,000 tonnes in 2010, increasing to 323,000 tonnes by 2020.<sup>32</sup> Provision in the borough exceeds this level with the South East London Combined Heat and Power Station (SELCHP) in Deptford capable of handling 488,000 tonnes alone. Further facilities in Lewisham are capable of dealing with over 200,000 tonnes and provide support to other boroughs in the south-east region of London.<sup>33</sup>

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<sup>30</sup> Department for Environment, Food and Rural Affairs (Defra), 2013. Municipal Waste Management Statistics. [online] (Updated 07/02/2013) Available at: <http://www.defra.gov.uk/statistics/environment/>

<sup>31</sup> Lewisham Municipal Waste Strategy 2008

<sup>32</sup> London Plan policy 4A.25 and Table 4A.6

<sup>33</sup> Southeast London Boroughs' Joint Waste Apportionment Technical Paper, 2009

## Appendix C

### Sustainability Objectives, Indicators, Targets and Monitoring

Sustainability Objective	Indicator	Target	Monitoring Year/Frequency	Data Source	Action
1. To provide sufficient housing and the opportunity to live in a decent home	<p>Number of housing completions</p> <p>Number of affordable housing completions (by tenure type)</p> <p>Mix of housing tenure</p> <p>Mix in dwelling sizes</p> <p>Provision of student/other specialist housing</p>	<p>50% affordable homes</p> <p>70:30 split between social and intermediate housing</p> <p>At least 40% affordable homes to be 3 bedrooms or more</p>	Annual	Annual Monitoring Report	Provision of housing, including affordable housing
2. To improve the health of the population	<p>Households with limiting long-term illness</p> <p>Mortality rate from circulatory diseases at age under 75</p> <p>Mortality rate from all cancers at age 75 of under</p> <p>Health life expectancy at age 65</p> <p>Number of people taking part in activities that improve physical and mental health in the borough</p>		Every 10 years	ONS	<p>Encourage walking and cycling</p> <p>Maintain or improve access to healthcare</p>
3. To reduce poverty and social exclusion	<p>Number of recorded racial incidents</p> <p>Indices of Multiple Deprivation</p>	<p>Improve the London Borough of Lewisham's rank in the Indices of Multiple Deprivation</p>	Every 3 years	CLG	Promote social cohesion and reduce poverty

<p>4. To reduce crime, antisocial behavior and the fear of crime</p>	<p>Number of schemes incorporating 'secured by design'</p> <p>Number of offences per 1,000 population</p> <p>Detailed indicators for the following:</p> <ul style="list-style-type: none"> <li>• Violence against the person</li> <li>• Burglaries</li> <li>• Robberies</li> <li>• Violent crime</li> <li>• Sexual offences</li> </ul>		<p>Annual</p>	<p>Office of National Statistics</p> <p>Metropolitan Police Service</p>	<p>Promote safety of the environment and social cohesion</p>
<p>5. To improve accessibility to leisure facilities, community infrastructure and key local services</p>	<p>Gain/loss of community/recreational facilities</p> <p>Delivery of identified social infrastructure</p> <p>Funding for community facility improvements secured</p>	<p>No net loss of recreational facilities</p>	<p>Annual</p>	<p>Annual Monitoring Report</p>	<p>Provision of leisure facilities, community infrastructure and key local services</p>
<p>6. To improve accessibility and achieve all principles of inclusive design.</p>	<p>Number of complaints related to accessibility concerns/incidents.</p> <p>Number of complaints related to discrimination concerns/incidents.</p> <p>Provision of suitable disabled access facilities to existing and proposed development.</p>		<p>Annual</p>	<p>Metropolitan Police Service</p> <p>Office of National Statistics</p> <p>Annual Monitoring Report</p>	<p>Improve accessibility and inclusive design.</p>
<p>7. To minimise the production of waste and increase waste recovery and recycling</p>	<p>% of waste recycled, reused or composted</p> <p>Tonnes of waste sent to landfill per year</p>	<p>Residual waste per household in Lewisham</p> <p>2011/2012 720kg</p>	<p>Annual</p>	<p>Strategic Waste and Management</p>	<p>Waste Management</p>

	<p>Residual household waste per year</p> <p>Amount of waste recycled on site by residents and employment industries</p>	<p>2012/2013: 718kg</p> <p>2013/2014: 716kg</p> <p>% of household waste sent for reuse, recycling and composting in Lewisham</p> <p>2013/2014: 21% waste recycled</p> <p>% household waste sent to landfill in Lewisham</p> <p>2011/2012: 7%</p> <p>2012/2013: 6.5%</p> <p>2013/2014: 6%</p>			
<p>8. To reduce car travel and improve accessibility by sustainable modes of transport</p>	<p>Number of car parking spaces delivered in new development</p> <p>Number of completed car limited developments</p> <p>Number of car clubs and parking bays</p> <p>% of permitted major developments with a travel plan</p> <p>Proportion of journeys made on foot and by bicycle</p> <p>Number of electric car charging points</p>	<p>Higher density development to be located within areas with a higher PTAL</p> <p>11% of total trips made by cycle or foot by 2025</p> <p>Year on year increase in number of electric car charging points</p> <p>All major developments to have travel plans</p>	<p>As reviewed by Transport for London</p>	<p>Transport for London</p> <p>Census</p> <p>Annual Monitoring Report</p>	<p>Maximise accessibility of waterways and rivers to services and public transport</p> <p>Enhance walking and cycling routes</p> <p>Reduce car ownership</p>

	<p>Improvements to legibility and signage</p> <p>Improved pedestrian and cycle routes and crossings</p> <p>Number of cycle parking spaces provided for each new home or other development and public realm</p> <p>Improved lighting and natural surveillance on pedestrian and cycle paths</p> <p>Number of road accident casualties per 1,000 population serious or fatal</p> <p>Public transport accessibility levels</p> <p>Improved river and waterways routes and access</p>	<p>All development permitted to include cycle facilities</p>			
<p>9. To maintain and enhance landscapes and townscapes. To conserve and where appropriate enhance the historic environment</p>	<p>Number of key views maintained and enhanced</p> <p>Pre applications and applications considered by the design review panel</p> <p>Number of interventions aimed at improving streetscapes</p> <p>Number of designated heritage assets (including listed buildings and conservation areas)</p> <p>Number of undesignated heritage assets (locally listed buildings, areas of archaeological significance)</p>	<p>All major applications to be referred to the design review panel</p>	<p>Annual</p>	<p>Annual Monitoring Report</p> <p>English Heritage</p>	<p>Protect landscape and townscape</p> <p>Protect heritage assets</p>

	<p>% of applications where archaeological strategies were developed and implemented</p> <p>Number of applications that have considered views of strategic importance</p> <p>Condition of designated and undesignated heritage assets</p>				
10. To mitigate and adapt to the impact of climate change	<p>Number of homes achieving Code for Sustainable Homes level 4 or above granted/completed</p> <p>Number of BREEAM buildings granted/completed</p> <p>Number and capacity of decentralised energy granted/completed</p> <p>Number, type and capacity of renewable energy granted/completed</p> <p>Number and size of living roofs granted/completed</p> <p>Number of new developments incorporating water efficiency measures</p>	<p>Maximise renewable energy by type</p> <p>Increase in the number of living roofs and walls</p> <p>Year on year reduction in the carbon footprint of Lewisham</p> <p>All houses built to Code for Sustainable Homes Level 4</p> <p>All non-residential development built to BREEAM excellent standard</p>	Annual	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>CO2 reduction and energy efficiency</p> <p>Efficient use of natural resources</p>
11. To improve air quality and soil conditions and reduce noise and vibration	<p>LLSOA Electricity and Gas consumption</p> <p>Per capita reductions in CO2</p> <p>Levels exceeding Main Air Pollutant Quality Standards</p> <p>Levels of NO2 and PM10</p>	<p>National Air Quality Strategy standards</p> <p>Reduction in noise complaints</p> <p>No decrease in water quality</p>	Annual	<p>Annual Monitoring Report</p> <p>London Air Quality Archive</p>	<p>Water management and SUDS implementation</p> <p>Minimise air pollution</p> <p>Reduce noise</p>

	<p>Number of complaints related to noise from roads, construction, maintenance, noisy neighbours and/or other.</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p>	<p>Number of brownfield sites redeveloped</p> <p>Areas of land brought back into beneficial use</p>			<p>Consider compatibility of land uses</p>
<p>12. To increase, maintain and enhance open space, biodiversity, flora and fauna</p>	<p>Area of designated habitats</p> <p>Number and size of biodiverse brown living roofs granted/completed</p> <p>Number of bat and other bird boxes delivered as part of new developments</p> <p>Number of applications granted or refused on designated open space and within SINC's</p> <p>Amount of new or improved open space provided, including that which provides a net gain for biodiversity and accessible natural greenspace</p> <p>Number of new allotments and community gardens</p> <p>Funding secured for open space improvements</p>	<p>Year on year reduction in the ecological footprint of Lewisham</p> <p>Year on year increase in the number of bat and bird boxes provided with development</p> <p>No net loss of open space</p>	<p>Annual</p>	<p>Annual Monitoring Report</p> <p>EA and Stockholm Environment Institute</p>	<p>Efficient use of natural resources</p> <p>Maintain or enhance biodiversity importance</p> <p>Protect and enhance open space and linkages</p>
<p>13. To mitigate flood risk. Improve water quality and manage water resources. Restore and enhance the river network</p>	<p>Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defense grounds or water quality</p> <p>Number of SUDS granted and delivered</p> <p>Water pollution incidents</p>	<p>No applications granted contrary to Environment Agency advice</p> <p>A length of watercourse restored or enhanced</p>	<p>Annual</p>	<p>Environment Agency</p>	<p>Work in partnership with the Environment Agency</p>

	<p>Change in chemical river quality</p> <p>Number of developments approved against the recommendation of the statutory water/sewerage undertaker on low pressure/flooding grounds</p> <p>Number of Considerate Constructors schemes registered with new developments and refurbishments</p> <p>River Restoration Projects</p> <p>Funding secured for waterways improvements</p>				Flooding and water management
14. To encourage sustained economic growth	<p>Area of employment land with mixed use employment location (MEL) and local employment location (LEL)</p> <p>Size and type of employment floorspace</p> <p>Amount of vacant employment floorspace</p> <p>Amount of new completed employment floor space</p> <p>New business registration rate</p> <p>Rent levels of employment accommodation</p>	<p>No loss of employment land</p> <p>Minimise vacant employment land</p> <p>Annual completion no net loss</p>	Annual	<p>Lewisham ELS</p> <p>London Borough of Lewisham GIS</p> <p>Annual Monitoring Report</p>	<p>Protection of employment sites</p> <p>Maintain a supply of a variety of employment floorspace</p>
15. To promote access to employment, education, skills and training	<p>Employee numbers in Lewisham</p> <p>% of businesses in the area showing employment growth</p> <p>Job density in Lewisham</p> <p>Number of employed and unemployed living in the area</p>	<p>Increase in jobs</p> <p>Increase in percentage of local residents employed for specific development projects, including apprenticeships</p>	Annual	<p>National Annual Business Inquiry</p> <p>Office of National Statistics</p> <p>Official Labour Market Statistics</p>	Maximise and provide a range of local employment opportunities

	<p>Numbers of employees and business owners who are BME</p> <p>% of population of working age who claim unemployment benefit</p> <p>Number of pupils achieving 5 or more GCSE's at grades A* to C or equivalent</p> <p>People aged 16-74 with no qualifications</p> <p>Number of full and part time courses provided</p> <p>Number of full and part time people participating in educational courses/events in the area</p> <p>Funding secured for improvements in the quality and level of education infrastructure</p>	<p>No reduction in job density</p> <p>Increase in employment rate</p> <p>Narrow gap to the GB average employment rate to no more than 3% points</p> <p>Year on year decrease in the number of people without qualifications in Lewisham</p>			<p>Protection of employment sites to secure local job opportunities</p> <p>Local labour agreements</p>
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Appendix D  
Decision Aiding Questions

SA Objective	Decision Aiding Questions
1. To provide sufficient housing and the opportunity to live in a decent home	<p>Additional housing?</p> <p>Increase the range and availability of housing?</p> <p>Reduce the number of unfit homes?</p>
2. To improve the health of the population	<p>Encourage healthy lifestyles?</p> <p>Improve qualifications and skills?</p> <p>Reduce health inequalities?</p>
3. To reduce poverty and social exclusion	<p>Reduce poverty and social exclusion?</p> <p>Encourage engagement in community activities?</p> <p>Increase the ability of people to influence decisions?</p> <p>Improve community relations?</p>
4. To reduce crime, antisocial behavior and the fear of crime	<p>Reduce actual levels of crime?</p> <p>Reduce the fear of crime?</p>
5. To improve accessibility to leisure facilities, community infrastructure and key local services	<p>Proximity to leisure facilities, community infrastructure and key local services?</p>
6. To improve accessibility and achieve all principles of inclusive design.	<p>Increase accessibility?</p> <p>Encourage and increase inclusive design?</p>
7. To minimise the production of waste and increase waste recovery and recycling	<p>Lead to reduced consumption of materials and resources?</p> <p>Reduce household waste?</p> <p>Increase waste recovery and recycling?</p> <p>Reduce hazardous waste?</p>
8. To reduce car travel and improve accessibility by sustainable modes of transport	<p>Reduce car use?</p> <p>Reduce vehicle movement?</p> <p>Proximity to public modes of transport?</p> <p>Encourage sustainable modes of transport?</p> <p>Encourage the use of waterways?</p> <p>Increase/enhance walking/cycling routes?</p>
9. To maintain and enhance landscapes and townscapes. To conserve and where appropriate enhance the historic environment	<p>Loss or damage to significant landscape or townscape features?</p> <p>Improve the landscape and ecological quality and character?</p> <p>Improvement to streetscape/public realm?</p>

	<p>Conserve and enhance the historic built character of the borough, especially within designated conservation areas?</p> <p>Protect sites of archaeological and historic importance?</p>
<p>10. To mitigate and adapt to the impact of climate change</p>	<p>Promote consumption of natural resources in a sustainable manner?</p> <p>Include sustainable design?</p> <p>Promote energy and water conservation?</p> <p>Reduce greenhouse gas emissions?</p> <p>Lead to an increased proportion of energy needs being met from renewable/decentralised sources?</p> <p>Reduce and mitigate for any effects of climate change?</p>
<p>11. To improve air quality and soil conditions and reduce noise and vibration</p>	<p>Improve air quality?</p> <p>Reduce noise?</p> <p>Reduce vibration?</p> <p>Proximity to public modes of transport?</p>
<p>12. To increase, maintain and enhance open space, biodiversity, flora and fauna</p>	<p>Conserve and enhance natural/semi-natural habitats?</p> <p>Conserve and enhance species diversity, and in particular avoid harm to protected species?</p> <p>Maintain and enhance sites designated for their nature conservation interest?</p> <p>Protection and improvement of existing open space?</p> <p>Provision and quality of open space?</p> <p>Improve accessibility and connectivity to open space?</p>
<p>13. To mitigate flood risk. Improve water quality and manage water resources. Restore and enhance the river network</p>	<p>Is there flood protection?</p> <p>SUDs?</p> <p>Decreasing run-off?</p> <p>Improve the quality of river water or ground water?</p> <p>Conserve water?</p> <p>Water and sewage infrastructure capacity?</p> <p>Restoration and management of Waterways through natural process?</p>

	<p>Improve accessibility and connectivity to waterways?</p>
<p>14. To encourage sustained economic growth</p>	<p>Improve business development and enhance competitiveness?</p> <p>Improve the resilience of business and the economy?</p> <p>Promote growth in key sectors and clusters?</p>
<p>15. To promote access to employment, education, skills and training</p>	<p>Reduce unemployment and long-term unemployment?</p> <p>Provide job opportunities for those in need of employment?</p> <p>Improve the quality and level of education infrastructure?</p>