



**London Borough of Lewisham
Local Development Framework
Core Strategy Development Plan Document
Sustainability Appraisal / Strategic Environmental Assessment
Adoption Statement**

1. Overview

- 1.1 Lewisham Council adopted the Core Strategy development plan document at its meeting on 29 June 2011. In accordance with Regulation 16(3) and (4) of the SEA Regulations, the Council has produced this sustainability appraisal (SA) adoption statement. It describes:
- how the SA process has influenced the progression of the Core Strategy
 - how environmental considerations and consultation responses have been taken into account during its preparation
 - outlines the reasons for choosing the preferred strategy in light of other reasonable alternatives
 - sets out measures that will be used to monitor the effects of the Core Strategy.
- 1.2 Full details are set out in the final SA, which was submitted with the Core Strategy to the Secretary of State for Communities and Local Government on 28 October 2010.

2. Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) background

- 2.1 Sustainability appraisals are a requirement of the Planning and Compulsory Purchase Act 2004 and Strategic Environmental Assessments are required by European Directive EC/2001/42 (SEA Directive). This was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes July 2004. Central government guidance (ODPM, 2005) has merged these processes to allow for a single joint appraisal to be carried out.
- 2.2 The SEA Regulations requires local planning authorities to carry out formal strategic environmental assessment of certain plans and programmes which are likely to have significant effects on the environment. The SEA process ensures that opportunities for public involvement are provided and the significant environmental effects arising from policies, plans and programmes are predicted, evaluated, mitigated and monitored.
- 2.3 Planning Policy Statement 12 (PPS12) requires a sustainability appraisal (SA) of local development documents, which incorporates the requirements of the Strategic Environmental Assessment Directive but broadens this to include both social and economic considerations. The purpose of SA is to systematically appraise the social, environmental and economic effects of the strategies and policies in a local development document from the outset of the preparation process. This will ensure that decisions are made that accord with sustainable development.
- 1.4 Throughout the remainder of this statement, reference to SA encompasses the requirements of a merged SA/SEA.

3. SA process

- 3.1 The Core Strategy sets out the vision, strategic objectives, spatial strategy and policies for the spatial development of the borough over the next 15 years (2011 to 2026). The purpose of the Core Strategy is to establish the broad principles and locations for delivering housing and other strategic development, for example employment, retail and transport, and provide clear policies to support development.
- 3.2 Each progressive phase of the SA has been prepared by officers from the London Borough of Lewisham's Planning Policy team, with input from other relevant services of the Council. The Landscape Partnership completed an independent review and deemed the process and content sound. All recommendations made through the independent review were incorporated within each SA report.
- 3.3 The SA comprised a number of stages.
- The production of a **scoping report**, which examined sustainability issues in the borough. The issues identified were used to produce a sustainability appraisal framework against which the plan could be measured. The scoping report was published for consultation in May 2005.
 - The appraisal of the Core Strategy **issues and options** and **preferred options**, the results of which are presented within the SA report, February 2007.
 - The appraisal of **further options**, the results of which are presented within the SA report, February 2009.
 - The appraisal of the **proposed submission** Core Strategy (the draft plan), the results of which are presented within the SA report, February 2010.
 - The appraisal of the **submission version** Core Strategy and preparation of a revised (final) SA report, September 2010. This presented the results for the SA process including information gathered, the method used and the results of the appraisal of the Core Strategy as it has been prepared.
- 3.4 At each stage the vision, objectives and policy content of the Core Strategy were assessed against a framework of sustainability objectives. The objectives covered social, environmental and economic issues reflecting national, regional and local issues as well as environmental considerations set out in the SEA guidance. Table 1 summarises the key sustainability issues and how these related to the selected SA objectives.

Table 1: Key sustainability issues

Key issues	Source
Economic (SA objectives 1, 2)	
<p>Limited employment opportunities outside of public sector</p> <p>High commuter population working outside of Lewisham</p> <p>Need to create employment and training opportunities in the borough to create a more sustainable environment and enhance the local economy.</p>	<ul style="list-style-type: none"> • Lewisham Employment Land Study 2008 • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 • Lewisham Economic Development Business Plan 2004 (Ancer Spa) • Local Futures: The State of the Borough 2004 • Lewisham Local Cultural Strategy 2002

Key issues	Source
<p>Varied levels of growth in local shopping areas</p> <p>With predicted population growth there is a need for enhancing the vitality of the local shopping areas including markets, to improve the local economy and reduce the need to travel outside the borough for goods and services.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham Retail Capacity Study 2009 • Lewisham Town Centre Health Check Report 2008/09 • London-wide Town Centre Health Checks Analysis 2008 • Managing the Night Time Economy 2007
<p>Provision of adequate employment land to support business enterprise</p> <p>Sufficient employment land will need to be protected and new land sought to improve the overall economy of the borough. Opportunities need to be taken to support employment growth sectors.</p>	<ul style="list-style-type: none"> • Lewisham Employment Land Study 2008 • Lewisham Economic Development Business Plan 2004 (Ancer Spa) • Local Futures: The State of the Borough 2004 • Lewisham Local Cultural Strategy 2002
<p>Finding a balance between meeting housing targets and maintaining economic and cultural vitality</p> <p>A general conflict between meeting housing targets and protecting sites for other uses such as employment, retail, education, health, community in a built up environment.</p>	<ul style="list-style-type: none"> • Lewisham Employment Land Study 2008 • Lewisham Strategic Housing Market Assessment 2008 (SHMA) • South-east London Sub Regional SHMA • Lewisham Economic Development Business Plan 2004 (Ancer Spa)
Environmental (SA objectives 3 to 12)	
<p>Protect and improve biodiversity and natural habitats including local waterways</p> <p>Brownfield sites are important habitat for local species. Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered marked declines.</p> <p>The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham Leisure and Open Space Study 2009 • Lewisham Biodiversity Action Plan 2006 • Thames Strategy East 2008 • Green Chain Policy Document 1977 • Ravensbourne River Corridor Improvement Plan 2010 (RRCIP)
<p>CO₂ emissions contributing to climate change</p> <p>Climatic change due to greenhouse gas emissions from fossil fuel use are likely to affect the natural environment. The built environment will need to adapt to these changes and find ways of reducing carbon emissions, including developing viable decentralised renewable energy networks to supply energy to new and existing developments.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Carbon Reduction and Climate Change Strategy 2008 • Lewisham Energy Strategy • Air Quality Action Plan 2008 • Lewisham Renewable Energy Study 2009 • Strategic Flood Risk Assessment 2008 and Sequential Test 2009 (SFRA) • Local Implementation (Transport) Plan 2006 (LIP)

Key issues	Source
<p>Traffic congestion and car dependence A growing population will increase movement, placing pressure on the road network and existing public transport. Development to be located near existing transport links, improve walking and cycling routes, public transport; and adopt a managed/restrained approach to car parking.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • LIP 2006 • North Lewisham Links Strategy 2007 • RRCIP 2010 • Borough-wide Transport Study 2010 • Deptford New Cross Transport Study 2009 • Lewisham Town Centre Transport Study 2009
<p>High levels of air and noise pollution due to traffic Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport to reduce carbon emissions.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Air Quality Action Plan 2008 • LIP 2006 • Borough-wide Transport Study 2009 • Health Issues in Planning, Best Practice Guidance 2007 • Transport 2025, Transport vision for a growing world city, November 2006
<p>Protect and provide opportunities to enhance local heritage assets (cultural, archaeological and historic) from redevelopment and recognise the contribution that the historic environment can make to an area Lewisham has two Grade I listed buildings, a number of Grade II buildings and many locally listed buildings and conservation areas. The borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development proposals.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Deptford New Cross Masterplan 2007 • Lewisham Local Cultural Strategy 2002 • Lewisham Conservation Area Appraisals and Management Plans • Lewisham Local List and Listed Buildings • Lewisham UDP Schedules 1A, 3 and 5 • Lewisham Leisure and Open Space Study 2009 • Lewisham Tall Buildings Study 2010 • Lewisham Borough-wide Character Study 2010
<p>The Deptford New Cross area and the areas along the borough's river network are within the Flood Risk 3a (high probability) category Climate change is predicted to increase adverse weather patterns, leading to more intense and severe flooding in flood risk areas. There is a need to reduce flooding and manage risk.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham SFRA • RRCIPlan 2010 • Lewisham Leisure and Open Space Study 2009 • Lewisham Borough-wide Character Study 2010
<p>Ageing housing stock and poor levels of insulation The existing housing stock will require updating with improvements in energy efficiency and building Standard Assessment Procedure ratings (current SAP rating are 46 out of 100) (29.4% of residents are living in unsuitable housing).</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham SHMA 2008 • South-East London Sub Regional SHMA • Lewisham Housing Strategy • Lewisham Energy Strategy • Lewisham Renewable Energy Study 2009

Key issues	Source
<p>Low levels of recycling and the need to reduce total waste production</p> <p>There is a need to reduce waste generation and improve recycling and composting rates. With requirements to manage our waste within the borough boundaries this issue will become increasingly important.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • South East London Boroughs' Joint Waste Apportionment Technical Paper • Lewisham Waste Management Strategy
Social (SA objectives 13 to 19)	
<p>High demand for housing, affordability and continuous growth in population.</p> <p>The population is forecasted to rise. The Mayor of London requires 9,750 new residential units to be built in Lewisham by 2017. The average income of the majority of households is insufficient to buy a house.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham SHMA 2008 • South East London Sub Regional SHMA • Housing Strategy 2009 • Children and Young Peoples Plan
<p>Improved access to health care, education and community facilities</p> <p>Ensure that improved and accessible health, education and community facilities are provided to accommodate the needs arising from new developments and meeting existing needs.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham Social Inclusion Strategy 2005 • Lewisham NHS Estate Strategy • Local Education Authority Plans • Lewisham Infrastructure Delivery Plan • Lewisham Physical Activity, Sport and Leisure Strategy 2006 • Lewisham School Sports Facility Strategy 2006
<p>Low levels of educational attainment</p> <p>There is a need to improve the educational attainment of students in primary and secondary schools.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Children and Young Peoples Plan • Local Education Authority School Plan • Lewisham School Sports Facility Strategy 2006
<p>General perception of high crime rates in Lewisham</p> <p>Though Lewisham has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment with adequate natural surveillance.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Lewisham Social Inclusion Strategy 2005 • Lewisham Local Cultural Strategy 2002
<p>Addressing deprivation, social exclusion and health inequalities</p> <p>Lewisham has a number of severely deprived areas. Fourteen of Lewisham wards have part of their area in the 20% most deprived wards in England.</p> <p>There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham's SCS • Indices of Multiple Deprivation 2007 • Joint Strategic Needs Assessment • Children and Young Peoples Plan

Key issues	Source
<p>Provision of open space and recreational facilities</p> <p>Future growth in the housing sector will result in a lower proportion of open space per 1000 population. Opportunities to provide additional open spaces from potential developments must be used to improve health and well-being.</p>	<ul style="list-style-type: none"> • Shaping our Future Lewisham’s SCS • Lewisham Leisure and Open Space Study 2009 • Lewisham Physical Activity, Sport and Leisure Strategy 2006 • Green Chain Policy Document 1977

4. How sustainability and environmental considerations have been integrated into the Core Strategy

4.1 The Core Strategy integrates sustainability and environmental issues by providing a link between the sustainability appraisal objectives and the Core Strategy spatial strategy and policies, in the following key ways.

- Supporting the regeneration and renewal of the London Plan Opportunity Areas at Catford, Lewisham, New Cross and Deptford, working in close partnership with all key stakeholders.
- Increasing the number and variety of job opportunities for local people by protecting land for employment use within neighbourhoods and seeking contributions to employment and skills support programmes.
- Supporting the growth of key economic sectors by maintaining a varied supply of business premises by ensuring a mix in employment land designations and through plans for town centre regeneration.
- Increasing the overall supply of housing and increasing the mix and quality of housing (including affordable and family housing) to meet need identified through the Strategic Housing Market Assessment.
- Enabling Lewisham to adapt to the effects of climate change through the design of the built environment, the management of flood risk, providing sustainable urban drainage, retaining existing trees, urban greening, and maximising water efficiency within new developments.
- Reducing carbon emissions by minimising the need to travel, promoting decentralised energy networks, and maximising energy efficiency and renewable energy generation in buildings through the application of the Code for Sustainable Homes and Building Research Establishment Environmental Assessment Method, and implementing the Lewisham Carbon Reduction Climate Change Strategy and Air Quality Management Plan.
- Safeguarding and increasing biodiversity through co-ordinated implementation of the Lewisham Biodiversity Action Plan, supporting river naturalisation and seeking living roofs where appropriate.

- Contributing to the delivery of Lewisham’s Waste Management Strategy by maintaining an appropriate supply of land for waste management and operational use and seeking the most effective waste management facilities within new developments.
- Working in partnership with government, Transport for London, Network Rail and major developers to increase public transport capacity and accessibility, reduce reliance on the private car, promote walking and cycling, and provide alternatives to road-based freight and construction transport.
- Increasing the quality of open space by safeguarding, linking and upgrading existing open space, improving access to all open space, retaining existing trees and planting new trees, and seeking new on-site open space wherever possible including the implementation of the North Lewisham Links Strategy.
- Creating and sustaining distinctive local places through excellent design of buildings and the public realm, valuing heritage assets and the natural environment.
- Developing and sustaining stable neighbourhoods with a high quality, liveable residential environment, respecting local amenity, and ensuring good access to local services and transport.
- Protecting and enhancing the borough’s historic assets, the setting of the Maritime Greenwich World Heritage Site and strategic and local views by working in partnership with English Heritage, neighbouring boroughs and community groups.
- Contributing to improving health and well-being and reducing health inequalities in the borough’s most deprived wards by working with NHS Lewisham, encouraging healthy lifestyles in the design of the built environment and implementing the Air Quality Management Plan.
- Providing essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes through the Infrastructure Delivery Plan and ongoing liaison with statutory undertakers.
- Increasing community safety, by implementing Safer by Design principles to design out crime and reduce the fear of crime in the built environment, and joint working within the Safer Lewisham Partnership.

5. How the consultation findings have been taken into account

5.1 The following sections explain how the SA consultation responses have been taken into account, and the reasons for choosing the Core Strategy as adopted, rather than the alternative options proposed.

5.2 Preparation of the SA for the Core Strategy was an iterative process informing policy formulation at every stage. In total there have been four main stages of consultation,

although comments and input have been accepted throughout the appraisal. Consultation has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations, the Town and Country Planning (Local Development) (England) Regulations 2004, the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and Lewisham's adopted Statement of Community Involvement (July 2006).

- 5.3 Throughout the process, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). Comments from these bodies have shaped the appraisal and have been fed into the assessment of options, preferred options and the formulation of the Core Strategy itself up to and including submission. At each stage, details regarding the comments received and the changes made as a result of those comments have been provided. No trans-boundary consultation with other Member States were deemed necessary for the document.
- 5.4 Work on the Core Strategy began in 2005. Table 2 summarises the key stages in the development of the Core Strategy, the timetable and the opportunities for comment during the process. At each stage the Core Strategy was revisited to ensure that representations received could be addressed, as appropriate.

Table 2 Key stages in the development of the Core Strategy

Stage and output	Linkages to plan preparation	Purpose
STAGE A SCOPING REPORT SA scoping report (May 2005)	Formulated alongside the preparation of the evidence base.	A1 Identify other relevant plans and programmes A2 Collecting baseline information A3 Identifying environmental problems A4 Developing the SA objectives A5 Consulting on the scope of the SA
Statutory and public consultation on the SA Scoping Report		
STAGE B Developing and refining options Issues and Options SA (August 2006)	Formulated alongside the preparation of issues and options.	B1 Refining issues and options for the plan B2 Appraise the sustainability of the options
STAGE C Draft SA Report Preferred Options SA (March 2007) Further Options SA (February 2009) Proposed submission SA (January 2010)	Formulated alongside the preparation of the preferred options. Consultation on both will take place at the same time.	C1 Identify preferred options C2 Assessing the effects of the plan (economic, social and environmental) C3 Developing proposals for monitoring the plan
Statutory and public consultation on the SA and SEA of the Core Strategy Preferred Options (2007) Statutory and public consultation on the SA and SEA of the Core Strategy Options (2009)		

Stage and output	Linkages to plan preparation	Purpose
STAGE D Final SA Report Submission SA (September 2010)	Formulated alongside the preparation of the submission version. Consultation on both will take place at the same time.	D1 Appraising significant changes to the plan arising out of consultation undertaken in Stage C D2 The SA to be used as part of determining the 'soundness' of the plan and whether it should be approved or not
Statutory and public consultation on the SA and SEA of the Core Strategy Submission Version (2010)		
STAGE E Annual Monitoring Report	The sustainability of the Site Allocations DPD will be reviewed as part of the Annual Monitoring Report.	E1 Monitoring implementation of the plan

5.5 The aim of stages A and B was to understand public and stakeholder views and to invite feedback on the issues and options for the Core Strategy so that a preferred approach could be developed. The aim of stage C was to obtain feedback and test the preferred approach reflected in the Draft Core Strategy (or proposed submission version). In addition, this stage sought views on the recommendations of the SA and the extent to which respondents thought that these had been adequately addressed.

5.6 The LDF Core Strategy Consultation Statement submitted in October 2010 describes how the Council has undertaken community participation and involvement in the preparation of the Core Strategy and identified where changes were made during redrafting to the Core Strategy as a result of representations received for the following stages:

- issues and options (2005)
- preferred options (2007)
- (further) options (2009)
- proposed submission (2010).

5.7 These documents are available to view on the Council's website (<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/core-strategy/Pages/default.aspx>).

5.8 The following sections detail the consultation undertaken in relation to the SA.

Scoping report consultation (2005)

5.9 Prior to the production of the Core Strategy a scoping stage was necessary to propose and agree the appraisal methodology and collate the information needed to carry this out. The appraisal needed to be set within the context of existing plans and policies and an understanding of the current baseline situation was essential to predict effects and identify key sustainability issues and problems.

5.10 Sustainability is a complex issue so 14 sustainability objectives were produced to consider relevant local issues. These objectives covered a range of economic, environmental and social impacts, for example: encouraging and promoting employment

and new enterprises in Lewisham, improving air quality and reducing pollution and the emissions from greenhouse gases, and improving the health of the population. There have been several changes and additions to the objectives arising from comments from the statutory bodies and key stakeholders at each consultation stage. However, the initial objectives were used as a framework for each future stage of appraisal.

5.11 The consultation sought to:

- ensure the SA methodology is comprehensive and robust enough to support the DPD during the later stages of full public consultation and examination
- advise on the appropriateness of the sustainability objectives
- advise on the appropriateness of the key sustainability issues
- advise on the comprehensiveness of the baseline data.

5.12 Consultation on the scoping report was carried out in May 2005. The following bodies with environmental responsibilities were consulted:

- Countryside Agency
- Environment Agency
- English Heritage
- English Nature

5.13 Two formal responses from the Environment Agency and the Greater London Authority were received in relation to the scoping report consultation.

5.14 The Environment Agency commented that:

- the Vision should include references to biodiversity enhancement
- the Strategy should aim to achieve environmental protection and enhancements as well as economic and social improvements
- the Core Strategy objectives should ensure that flood risk assessment and managements should be applied on a catchment wide basis for the full range of flood mechanisms
- the baseline sections should establish a clear picture of the presence, function of biodiversity
- consider biodiversity issues on all sites in the borough
- SUDS should be identified as an environmental issue and
- a number of biodiversity indicators should be included.

5.15 The Greater London Authority (GLA) welcomed the early consultation on the documents and supported the overall policy thrust of the evolving LDF. There were some concerns raised in relation to the need for more detail and emphasis to reflect London Plan policy and inclusion of references to strategic designations within the borough. The vision needed to acknowledge Lewisham's location within the Thames Gateway growth area and refer to the London Plan designations for areas such as the Deptford Creek/Greenwich Riverside Opportunity Area. The GLA also commented that the work on the Green Grid should be referred to and the renewable energy and energy efficiency sections should be strengthened.

5.16 The statutory responses were taken on board and informed the preparation of options for the Core Strategy and the accompanying SA.

Refining options and predicting effects

- 5.17 There is more than one way of meeting the needs of people who live and work in the London Borough of Lewisham so various options for development were proposed at the Issues and Options stage in 2005 (July to November). The methodology for carrying out a SA, proposed at the scoping stage, was used to test each of these options and predict their significant positive and negative impacts on the baseline data identified at the scoping stage. This also drew on legal requirements and targets identified by the review of relevant plans, policies and programmes. However, in some cases professional judgement, predominantly based upon consultation responses, was also used to predict the effects. This aimed to develop the plan options and compare these against the sustainability objectives in order to inform the decision-maker on how to develop the Core Strategy in the 'most sustainable' way. This process also identified areas to improve through mitigation. This, alongside public consultation responses, informed the choice of policy approach.
- 5.18 The options with the most positive and least negative sustainability impacts were recommended and without exception these were taken forward as policy approaches in the preferred options document *People, Places and Spaces – The Preferred Options report for the Spatial (Core) Strategy* (May 2007).
- 5.19 Once the policy approaches were selected, their likely significant effects were evaluated by testing potential outcomes against the baseline data and targets set in other plans and programmes. During this evaluation, measures were suggested to mitigate against adverse effects and maximise beneficial effects to further improve the sustainability of each policy.
- 5.20 The preferred options SA was issued for consultation alongside the Core Strategy preferred options in May 2007. Comments on the SA were received from the Environment Agency and Natural England.
- 5.21 The Environment Agency sought to ensure a flood risk sustainability objective appraised the reduction as well as the mitigation of flood risk. This was in accordance with Planning Policy Statement 25. The EA also wished to see the findings of the SFRA incorporated into the Core Strategy and the accompanying SA at the submission stage.
- 5.22 Natural England supported the SA objectives and the appropriateness of the policies, plans and programmes, as well as the proposed monitoring framework. Additional indicators were suggested.
- 5.23 In terms of the Core Strategy itself, the Government Office for London felt this round of consultation lacked a robust evidence base to justify the preferred options and did not offer sufficiently open options for public consultation. At the same time the government released further guidance on the appropriate content and level of detail expected in a Core Strategy, which necessitated further changes. Consequently, this resulted in a change of emphasis for the Core Strategy and the need to commission further evidence to inform and justify the options being put forward and considered.

Further options consultation (2009)

- 5.24 A further Core Strategy options report and SA was prepared which built on the previous options consultation stages and improved the spatial nature of the emerging plan. Two strategic spatial options were presented to manage physical growth and regeneration in the borough supported by a range of subject specific policy options. At the strategic level, option one proposed borough-wide regeneration and growth while option two proposed a more moderate approach.
- 5.25 Comments on the SA were received from English Heritage and Natural England.
- 5.26 English Heritage while pleased to see a distinct historic environment sustainability objective, thought the appraisal process could be more rigorous. They were concerned that consideration of the historic environment had been done in a very generic way and needed to be localised to a considerably greater degree. There was also an absence of strategy in respect of the non-architectural historic environment.
- 5.27 Natural England broadly supported the SA objectives and stated the SA covered areas and issues they would like to see considered. Additional plans, policies and programmes were suggested for inclusion.

Submission consultation (2010)

- 5.28 After extensive public consultation on the policy options, the submission policies were drawn up. Where these differed significantly from the policy options, a new sustainability appraisal was carried out on the differences; this included appraising any effects arising from the removal of several policies and amendments to others. At this stage the appraisal considered the implementation of all policies simultaneously (synergies between each policy), for example recognising where one policy can provide mitigation for another. To illustrate, several policies including CSP7 (Climate change and adapting to the effects), CSP8 (Sustainable design and construction and energy efficiency), CSP9 (Improving air quality) and CSP10 (Managing and reducing the risk of flooding) will help remove some of the adverse environmental effects arising from the provision of new development.
- 5.29 The Submission SA went out for public consultation with the Core Strategy Proposed Submission version during February to April 2010. Comments on the SA were received from English Heritage and Natural England.
- 5.30 English Heritage suggested additions to the baseline information, reference to the likely impact on Lewisham's heritage assets without implementation of the Core Strategy, amendment to the wording of the objective related to the historic environment and additional considerations when appraising the internal consistency of the SA objectives.
- 5.31 Natural England felt the SA covered the areas and issues they would wish to see considered in such a document. The proposed nineteen objectives were broadly supported.
- 5.32 The final SA report was produced in September 2010 incorporating all consultation comments, particularly those raised by English Heritage. This is a key output in the

appraisal process as it presents information and changes made during all stages of the appraisal. The final SA provides a key part of the evidence base for the Core Strategy DPD and was used to assess its 'soundness' during examination.

Examination (2011)

- 5.33 The Core Strategy was submitted to the government for examination by an independent Planning Inspector on 23 October 2010. The examination involved a public hearing, which took place over two days on 1 and 2 February 2011.
- 5.34 The Inspector's report was received on 23 March 2011, finding the Core Strategy sound. The report noted that SA had been carried out and was adequate. The Inspector's report endorsed a number of minor changes to wording of the Core Strategy that had been proposed by the Council. None of the changes represented a significant change such that further public consultation or sustainability appraisal would be required. All minor changes had been the subject of public consultation when the Core Strategy was submitted or were discussed and agreed at the public hearings in February.

6. Key changes brought about by the SA process

- 6.1 The SA process was integral to the Core Strategy preparation, commencing with the production of the SA scoping report. This involved identifying the sustainability issues and objectives for the Core Strategy (the SA framework), as well as identifying relevant baseline information and indicators.
- 6.2 The Core Strategy went through four distinct iterations. At each stage the Core Strategy was tested against the SA framework so that the economic, environmental and social implications of different policy options could be taken into consideration. The Core Strategy was developed and modified, as appropriate, in line with the findings of the SA.
- 6.3 Some of the key changes made to the Core Strategy as a result of SA comments are set out below. For full details of the outcomes of the appraisal process refer to the final SA report (September 2010). Some key changes have included:
- revising the vision and objectives to strengthen references to the historic environment
 - ensuring strategic sites are developed in accordance with public transport accessibility levels or future accessibility achieved through investment in transport infrastructure and services
 - protecting a range of employment sites and promoting creative industries
 - seeking a 50 per cent strategic target for affordable housing
 - ensuring the provision of family housing (3+ bedrooms)
 - ensuring flood risk is assessed and managed including SUDS
 - expecting development to be built to the highest standards of sustainable design and construction
 - improving the quality and accessibility of open spaces
 - ensuring cycle parking is maximised
 - supporting the waste hierarchy and in particular the efficient use of resources, the reuse of materials and resources

7. Reasons for choosing the Core Strategy as adopted in light of reasonable alternatives

- 7.1 The identification of the initial issues and options came from a variety of sources. These ranged from national and regional directions, local community and corporate plans and strategies and public consultation. The full analysis of options and alternatives is provided in Section 6 of the final SA report (September 2010).
- 7.2 These key spatial issues and options related to:
- additional opportunities for the development of new homes to meet housing need
 - how to increase the number and variety of jobs in the borough
 - accessibility of public transport and ways to maximise current and future access
 - level of density for new residential development
 - access and provision of open space
 - where to locate tall buildings
 - provision of waste management facilities
- 7.3 Two final strategic spatial options were presented to guide regeneration and growth across the borough. The appraisal of the options through the SA framework suggests that there are more socio-economic benefits associated with the first option, while the environmental impacts for both options will need to be addressed through implementation and mitigation measures.
- 7.4 Option 1 was considered to provide a wider context for regeneration and thus promotes and enhances the socio-economic objectives, particularly those relating to addressing deprivation issues. The scale of development proposed, resulting in increased housing and a wider employment base (and the related training opportunities) are significantly greater. Strong positive impacts for the economic and social objectives could result in improvements to the north of the borough. Option 1 sees a 24 per cent increase over London Plan housing requirements. This enables the borough to meet housing demand and address housing affordability. Option 1 also reduces physical severance in the Evelyn and New Cross wards and has the potential to improve public transport accessibility, create places and improves connectivity. Issues relating to flood risk, air quality, waste and the use of natural resources will need to be mitigated through effective implementation.
- 7.5 Following consideration of the SA recommendations alongside the consultation results, a preferred approach was developed and reflected in the Core Strategy. This process has helped to ensure that the Core Strategy proposes the most appropriate strategy for the spatial development of the borough, given reasonable alternatives. In summary, the preferred approach involves:
- a focus for growth and development on Lewisham and Catford town centres and Deptford and New Cross (supporting the London Plan Opportunity Areas) – addressing the issues of transport capacity and other physical infrastructure
 - promotion of both economic and housing growth across the borough, with housing supply supporting economic growth by helping to ensure an appropriate supply of labour at both local and sub-regional levels
 - town centre regeneration to include housing in appropriate locations

- the mix, balance and diversity of residential neighbourhoods to be maintained, with an emphasis on increasing choice in the type and location of housing
- an approach to density that reflects the London Plan approach
- setting a strategic target to achieve 50 per cent affordable housing across the borough and prioritising the provision of family housing (3+ bedrooms)
- making clear the Council's support for tall buildings in appropriate locations in accordance with London Plan and national policies.

8. Monitoring

- 8.1 The SEA Directive requires the significant environmental effects of implementing the plan to be monitored "*in order, inter alia, to identify [...] unforeseen adverse effects and to be able to undertake remedial action*" (Article 10(1)). Local planning authorities should adopt an integrated approach to monitoring local development frameworks that takes full account of the monitoring needs of sustainability appraisal and the SEA Directive.
- 8.2 Delivery of the Core Strategy will be monitored annually through a framework of performance indicators and periodic reviews of the infrastructure schedule. This information will be published in the Lewisham [Annual Monitoring Report](#), produced in December each year. Where, as a result of monitoring, indicators show that a policy is not working or key targets are not being met this remedial action may be taken or it may give rise to a review of the Core Strategy of other parts of the Local Development Framework. Appendix 8 of the Core Strategy sets out the framework of performance indicators and includes targets where these apply. Examples of indicators include:
- renewable energy capacity installed by type
 - number of local Biodiversity Plan objectives achieved
 - number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence or water quality grounds
 - percentage of new build and homes which meet the best practice standards, currently Code for Sustainable Homes Level 4 and BREEAM Excellent standard.

Further information

A full copy of the SA for the Core Strategy development plan document can be downloaded from the Council's website

<http://www.lewisham.gov.uk/myserVICES/planning/policy/LDF/core-strategy/Pages/default.aspx>