Lewisham local development framework



Sustainability appraisal and strategic environmental assessment

Core strategy – proposed submission version

February 2010Copy for public consultation











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Non-technical summary

This is a non-technical summary of the Sustainability Appraisal (SA) of the London Borough of Lewisham's proposed submission Core Strategy (Core Strategy). The key findings of the current phase of the SA are presented with a short summary of the SA process.

What is sustainability appraisal?

Government legislation requires the Council to carry out a Sustainability Appraisal (SA) of all the documents which make up the Local Development Framework (LDF). The purpose of a SA is to make sure that all the things which are referred to as sustainability issues such as using public transport not the private car, the impact of flooding or climate change, or the pressures placed on open space from an increasing population, are taken into account when preparing LDF documents such as the Core Strategy. The idea is that once adopted, the Core Strategy will be the most sustainable that can be put forward as it will have taken into account all the sustainability issues as part of the process of preparation.

The SA:

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

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

The SA focuses on economic, environmental and social considerations. The SA was carried out in parallel with developing options and alternatives for the Core Strategy and the assessment results feed back into the Core Strategy again and again until a balanced approach was reflected and the most sustainable approach adopted.

In addition to the Government's requirement for SA, the Council is required under European Directive to undertake a Strategic Environmental Assessment (SEA) of new plans. Government guidance considers it appropriate to combine both assessments through a single approach. The Council's report therefore integrates both SA and SEA and is referred to by the single term 'sustainability appraisal'.

Process so far

The government has set out the methodology to carry out the SA process in good practice guidance ¹ and identifies the following stages:

¹ Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, published by the Office of the Deputy Prime Minister (ODPM) (now called CLG: Communities and Local Government) in 2005

Stage A	Setting the context and objectives, establishing the baseline and		
	deciding on scope		
Stage B	Developing and refining options and assessing effects		
Stage C	Preparing the SA report		
Stage D	Consulting on the preferred options of the DPD and the SA report		
Stage E	Adoption and monitoring plans		

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

Core Strategy proposed submission version

The Lewisham Core Strategy sets out the vision, objectives, strategy and policies that will guide public and private sector investment to manage development and regeneration in the borough over the next 15 years. The Core Strategy is the key planning document in the Lewisham Local Development Framework (LDF). It sets out the overall ambitions and priorities for the borough, a set of proposals, and a means for making sure that they are delivered. Major change is anticipated, with a focus on Lewisham, Catford, Deptford and New Cross, and we need to plan for this.

The Core Strategy is based on a vision for the type of place the borough will be in 2025, the key drivers of change which impact on the borough now and in the future, and the need to ensure that any change is maximised for the long-term benefit of all in the Lewisham community. It builds on the vision outlined in the borough's Sustainable Community Strategy to make Lewisham the best place to live, work and learn over the next 15 years.

Above all things the Core Strategy is about shaping the future of the borough as a better place to live, work, relax and visit - often referred to as place making. This means deciding what sort of a place we want the borough to be in 2026. The London Plan sets a clear context for considering this and its requirements need to be developed at the local level taking full account of Lewisham's diverse character. The solution for one area of the borough may well not be appropriate for another so the Lewisham Core Strategy is locally distinctive in terms of the borough as a whole and the individual places within it.

The Core Strategy focuses growth and larger scale development in the north of the borough on the localities of Lewisham, Catford, Deptford and New Cross/New Cross Gate. These are identified as Regeneration and Growth Areas. Benefiting from higher levels of public transport accessibility and land that is available and deliverable, this strategy area will accommodate substantial new jobs, homes and supporting facilities and infrastructure. It will become a focus of change and significant regeneration. Smaller scale development opportunities arise in certain District Town Centres and Local Shopping Parades, including the immediate surrounding residential neighbourhoods. These strategy areas are identified

as District Hubs and Local Hubs. A managed approach to development will be adopted for other established residential neighbourhoods throughout the borough, including the protection of conservation areas. This strategy area is identified as the Areas of Stability and Managed Change.

Particular efforts to address deprivation and health inequalities, and improve well-being will be made in the Evelyn, New Cross and Lewisham Central wards within the Regeneration and Growth Areas, and the Bellingham, Downham and Whitefoot wards within a Local Regeneration Area.

Directing growth to key localities in the north of the borough ensures the character of the borough's conservation areas, residential neighbourhoods and the limited and finite supply of green and public open space are protected and enhanced.

Overall outcomes of the SA

In a built up urban area like Lewisham land will always be a scarce resource, especially due to the increasing demand for homes, employment opportunities and other supporting community and infrastructure facilities needed to support the existing and future population growth. It is important to seek a balance to promote a range of land uses to create sustainable and balanced communities.

Overall the findings of the SA process indicates that the implementation of the Core Strategy will lead to higher levels of sustainability in Lewisham through improved economic, environmental and social outcomes over the duration of the plan period. The appraisal has shown that the Core Strategy would provide a wide context for regeneration and would particularly benefit the most deprived wards located in the north of the borough (Evelyn and New Cross). The redevelopment opportunities of larger sites could radically improve the physical and socio-economic environment.

The relatively small economy of Lewisham indicates the necessity to protect employment sites and provide for employment growth sectors in order to retain and grow a workforce within the borough.

Issues related to flooding, climate change, waste generation and the efficient use of natural resources are very much dependent upon how development takes account of such factors at the design, construction and operation stages. Implementation will need to be monitored to ensure effective delivery.

Development within the Regeneration and Growth Areas is likely to increase road traffic and add pressure to the public transport system, which will increase traffic related air pollution and noise, impacting health. Cumulative impacts of development on air quality and traffic flow will need to be addressed with planning proposals.

It is expected that new development will be constructed to the highest standards of sustainable design and construction as proposed by the Core Strategy. There are opportunities available to provide on-site renewable energy, decentralised energy systems, promote the Code of Sustainable Homes and BREEAM 'very good' to 'excellent' standards in

new buildings, and ensure the efficient use of energy and other natural resources. This approach will help reduce the dependency on conventional fuel types for electricity and heating needs and will contribute towards achieving regional and national CO₂ reductions targets, hence mitigating climate change.

In all circumstances, the risk of flooding must be considered as a priority and any necessary mitigation and adaptation measures taken into account. The Council has produced a Strategic Flood Risk Assessment (SFRA) and Sequential Test, which has informed the preparation of the Core Strategy and will assist when considering planning applications.

It is anticipated that the amount of public open space per 1,000 population will be reduced as a result of higher density housing and the increase in population. The suggested policy approach for open space focuses on improving the quality of existing spaces rather than just seeking an unrealistic increase; and improving the accessibility of open spaces and connectivity to and between open spaces. It will still be necessary to protect any existing open space and make provision for additional open space where feasible, particularly in areas identified as deficient in provision.

The increased development may lead to habitat loss, particularly on sites that are derelict and vacant. The demand for development, and in particular housing is unlikely to prioritise these habitats. However, mitigation measures include introducing 'living roofs and walls' in new development and requiring on-site green open space in large scale development proposals.

Some temporary impacts have been identified on the natural environment during the construction phase particularly for air quality, noise, and vibration, which could be mitigated by introducing site specific measures.

Next steps

The Council intends to submit the Core Strategy to the Sectary of State in the Autumn of 2010, which will be accompanied by a final version of the SA. An Examination in Public will then be held by an independent Planning Inspector. The Inspector's report, anticipated for 2011 will be binding on the Council. The Core Strategy is then scheduled for adoption by the end of 2011.

Statement on the difference the process has made

The SA process was carried out in parallel to the plan making process (the preparation of the pre-submission version of the Core Strategy), therefore all findings during the process were integrated into each round of discussion among the members of the Planning Policy team and are reflected in the current version of the Core Strategy.

The SA process has helped in comparing alternative strategic spatial options, removing unrealistic alternative options and highlighting the key benefits of the preferred spatial strategy and subsequent cross cutting and thematic policies. The SA has helped to identify areas where the cross cutting policies can be strengthened to further ensure they deliver sustainable outcomes.

By developing and consulting on both the Core Strategy options and the SA together, environmental, social and economic considerations have been integrated throughout the process. Given this, the SA has generally confirmed that thinking on sustainability issues is well embedded with the preparation of the Core Strategy.

More generally, the SA process has produced substantial benefits in the plan-making process through the further development and assessment of the baseline, identification of indicators and targets and identification of significant benefits. The preparation of the SA report has resulted in a thorough analysis of the state of Lewisham as well as identification of trends covering environmental, social and economic issues. It has provided a robust evidence base for both the Core Strategy and forthcoming DPDs, such as the Site Allocations Development Plan Document (DPD) and Development Management policies DPD.

The SA has highlighted the need for partnership working to improve the provision of infrastructure (physical, social, green), particularly in relation to responding to the needs of the local communities and disadvantaged groups.

The need to monitor policies, set targets and identify indicators is an important part of the SA process. This will show whether the wider environment of Lewisham is improving or worsening, and thus enable amendments to be made to Core Strategy policies. One of the overall benefits of integrating the SA process with Core Strategy formulation will be the potential to identify and respond to changes in the wider environment quickly.

1. Introduction

This document is the Sustainability Appraisal and the Strategic Environmental Assessment (SA) of the proposed submission version of the Lewisham Core Strategy. This SA appraises the following elements of the Core Strategy:

- the strategic objectives
- the Lewisham Spatial Strategy
- the cross cutting policies.

1.1 Planning context

The *Planning and Compulsory Purchase Act 2004* requires local authorities to prepare a Local Development Framework (LDF) consisting of a suite of statutory planning documents, which collectively will deliver the planning strategy over a 15 year period. The LDF documents must give effect to the objectives of the local authority's Sustainability Community Strategy, which sets out the borough's strategic vision and is linked to overarching regional strategies.

The documents which will comprise the Lewisham LDF are:

- Core Strategy
- Development Management DPD
- Site Allocations DPD
- Area Action Plans
- Proposals Map
- Supplementary Planning Documents
- Statement of Community Involvement
- Annual Monitoring Report
- Local Development Scheme.

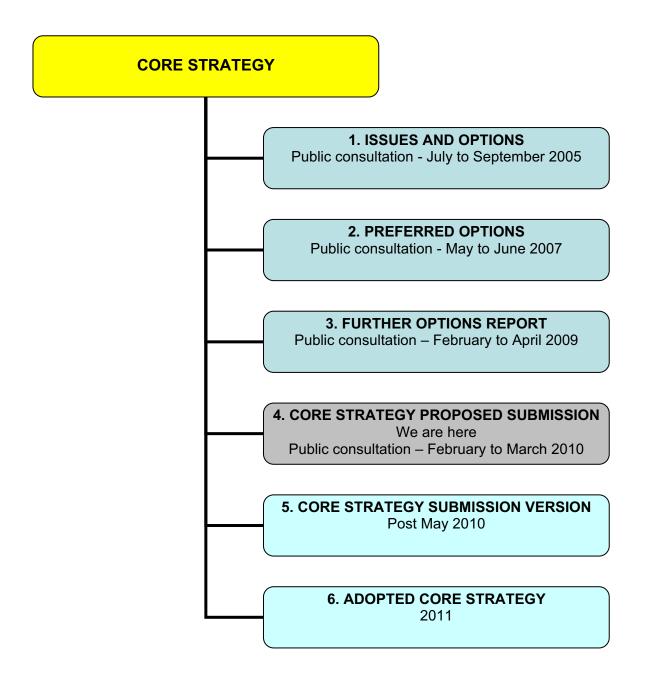
The Core Strategy forms the principal, overarching LDF document. All other LDF documents must be consistent with the Core Strategy. It sets out the vision, strategic objectives, spatial strategy, cross cutting policies and the delivery and monitoring strategies for the local area, taking into account the requirements of national legislation and policies, and regional statutory requirements, specifically those in the London Plan.

The Core Strategy will show:

- the areas where major regeneration will and are proposed to occur in Lewisham
- where additional housing is proposed to be located and the quantity across the borough
- what this means for transport; community, health and education facilities, our parks, and any other aspect related to ensuring Lewisham is the best place to live, work and learn.

The Core Strategy will be monitored annually in the Council's Annual Monitoring Report (AMR) and revised as appropriate if circumstances change.

The London Borough of Lewisham has been actively engaged in developing its LDF including the borough's Core Strategy since 2005. In accordance with legislative requirements the Core Strategy has been developed in a progressive, phased manner following extensive public consultation with a wide range of stakeholders including the local community. The Council has now completed the proposed submission version of its Core Strategy. The diagram below illustrates the steps and the timing involved in preparing the Core Strategy in Lewisham and the current phase of its development.



1.2 Legislative requirement for sustainability appraisal

Under EU legislation, local authorities are required to prepare a Strategic Environmental Assessment (the SEA Directive) of the effects of certain plans and programmes on the environment². This includes statutory plans concerning town planning.

The Planning and Compulsory Purchase Act 2004 transposed the EU requirement into UK legislation by introducing a requirement for local authorities to prepare Sustainability Appraisals (SAs) of LDF documents including the Core Strategy³.

Planning Policy Statement 12 (PPS12) provides further detail on SA and SEA of Development Plan Documents, including the Core Strategy. PPS12 identifies that SA should appraise social, economic and environmental sustainability, feed into and summarise other assessments, be proportionate to the plan, be an integral part of plan making, inform the evaluation of alternatives and provide a sound evidence base for the Core Strategy. This assessment is consistent with these objectives.

The government also introduced regulations and an associated practical guide to implement both the EC SEA Directive and the transposing UK legislation⁴. These detail the statutory requirements and contents of SAs. The SA section of the Plan Making Manual replaces the 2005 government guidance on 'SA of Regional Spatial Strategies and Local Development Documents' as it applies to Development Plan Documents. The Plan Making Manual has informed this assessment.

The statutory requirements for SAs encompass all the SEA environmental requirements but additionally also require economic and social considerations to be accounted for. As such, local authorities are not required to prepare a separate SEA in line with EU requirements.

1.3 Purpose of sustainability appraisal

The purpose of a SA is to promote sustainable development in the planning sector through better integration of environmental, social and economic considerations into the preparation and adoption of plans. A SA must assess the potential impacts of various proposed policies on the social, environmental and economic characteristics of an area and must propose measures to change policy and/or mitigate any conflicting effects identified from plan alternatives.

The SA does not seek to pre-judge the approach which the Core Strategy should adopt. The role of the SA is to:

- assist with the identification of the appropriate approach in sustainability terms
- predict implications for sustainable development
- put forward recommendations for improvement where necessary.

² EU Directive 2001/42/EC

³ The Sustainability Appraisal (SA) fulfils the requirement of section 19(5) of the *Planning and Compulsory* Purchase Act 2004 which states that Sustainability Appraisal is mandatory for development plan documents (DPDs). The core strategy is a DPD

⁴ The Environmental Assessment of Plans and Programmes Regulations 2004 and 'A Practical Guide to the Strategic Environmental Assessment Directive', Office of the Deputy Prime Minister (ODPM), (September 2005)

The Council is not required to pursue the recommendations from this process. For example, there may be specific local circumstances that justify choosing an option that does not perform as well as others when appraised against the SA framework. If such instances arise, close attention should be paid to implementing mitigation measures recommended from the appraisal matrix.

In its report titled 'The UK Government Sustainable Development Strategy (2005)' the UK Government's position on sustainable development is outlined. The Government defines sustainable development as:

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

The report states that the goal of Sustainable Development is to

'...enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.'

This goal will be achieved in an integrated way through:

- a sustainable, innovative and productive economy that delivers high levels of employment
- a just society that promotes social inclusion, sustainable communities and personal wellbeing
- ways that protect and enhance the physical and natural environment and use resources and energy as efficiently as possible.

The report also details five guiding principles to help achieve sustainable development:

- living within environmental limits
- · ensuring a strong, healthy and just society
- achieving a sustainable economy
- promoting good governance
- using sound science responsibly.

The report also identifies priority areas for immediate action. These are:

- sustainable consumption and production achieving more with less; breaking the link between economic growth and environmental degradation by reducing the inefficient use of resources, assessing the impacts of the whole lifecycle of goods and services and building on peoples awareness of environmental concerns
- climate change and energy reducing greenhouse gas emissions and adapting to the impacts of unavoidable climate change
- natural resource protection and environmental enhancement developing a better understanding of the limits of environmental resources, environmental enhancements and recovery, to ensure a decent environment for everyone and a more integrated policy framework

 sustainable communities - the aim is to create sustainable communities at a local level, that will involve working to give communities more power and say in the decisions that affect them.

1.4 Process so far

Sustainability appraisal is an ongoing process and to enable it to be effective and worthwhile the appraisal must start early in the plan preparation process. By doing so sustainability considerations can be effectively factored into the plan from its earliest stages. Three phases and associated consultations have informed this current SA of the Council's proposed submission version of the Core Strategy. These preceding SAs are listed in the table below. They have informed later stages of draft Core Strategy and have improved the sustainability of the draft plan. The table below also includes details of the consultation completed on the SA and SEA of the London Borough of Lewisham Core Strategy, in accordance with the SEA Directive, the Planning and Compulsory Purchase Act 2004 and related regulations and guidance.

A detailed breakdown of the influence of the SA and SEA on the Core Strategy at the Issues and Options Stage is provided as Appendix 11. The SA and SEA has further influenced the Proposed Submission stage of the preparation of the Core Strategy, particularly the policy for strategic sites. Further work was completed on the social, economic and environmental effects of the strategic sites proposed to provide a sound evidence base for the Core Strategy as a result of the SA.

Lewisham Council's phased approach to undertaking SA for the Core Strategy is shown below:

Stage	Report	What is does				
Stage A	Sustainability Appraisal Scoping	Setting the context and objectives,				
	Report	establishing the baseline and deciding on				
(May 2005)		scope				
Statutory and	Statutory and public consultation on the SA Scoping Report					
Stage B	Issues and Options SA Report	Developing and refining options and				
	(August 2006)	assessing effects				
Stage C	Sustainability Appraisal and	Preparing the SA report				
	Strategic Environmental					
	Assessment Preferred Options					
	Report					
	(March 2007)					
Statutory and p	public consultation on the SA and SEA	of the Core Strategy Preferred Options Report				
Stage D	Sustainability Appraisal and	Consulting on the preferred options of the				
	Strategic Environmental DPD and the SA report					
	Assessment Core Strategy Options					
Report (February 2009)						
Statutory and	public consultation on the SA and SEA	of the Core Strategy Options Report				
Stage E	SA report on the Proposed	Adoption and monitoring plans				
	Submission version of the Core					
	Strategy (January 2009)					

Since the SA good practice guidance was published in 2005, the government has revised the procedures for producing a DPD such as the Core Strategy. The new procedures are set out in *Planning Policy Statement 12 Local Spatial Planning* (PPS12) published in June 2008. This has changed Stage D, so that the SA report will now relate to a draft plan and then a final plan. Importantly the SA methodology reflects the Plan Making Manual, which considers the updated PPS12.

1.5 Who carried out the SA

All the progressive phases of each SA have been prepared by officers from the London Borough of Lewisham's Planning Policy team, with input from other relevant services. The Landscape Partnership completed an independent review of the SA and SEA process. The review also considered the content of the SA and SEA report for the assessment of the presubmission version of the Core Strategy. The Landscape Partnership deemed the SA and SEA process to be sound. All of the recommendations made through the independent review regarding the content of the SA and SEA have been incorporated into this report.

1.6 Consultation

Consultation with stakeholders is a key part of the SA process. All stages of SA preparation have been in accordance with statutory requirements and the Council's Statement of Community Involvement (SCI). The consultation procedure followed throughout the appraisal process has been in accordance with:

- Article 6 of the EU Directive 2001/42/EC
- Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004
- Regulations 25 and 26 of the Town and Country Planning (Local Development)
 (England) Regulations 2004 (Issues and Options and Preferred Options)
- Regulations 27 and 28 of the Town and Country Planning (Local Development)(England)(Amendment) Regulations 2008 (Publication and Representations).

The four (now three) Statutory Consultation bodies (Environment Agency, English Heritage, Countryside Agency, English Nature) were consulted throughout all stages of the SA process and have informed the preparation of the proposed submission version of the Core Strategy⁵.

1.7 Compliance with the SEA Directive/Regulations

The objective of SEA as defined in Article 1 of the SEA Directive is:

'to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development'.

This SA report incorporates the European requirements to undertake a Strategic Environmental Assessment. Appendix 1 signposts the requirements of Article 5(1) of the European Union Directive 2001/42/EC that are being met in this document and where they were met in previous SA reports.

⁵ The Countryside Agency and English Nature have since amalgamated to form English Nature

1.8 Methodology and structure of this report

As stated above, the government has set out the methodology and statutory requirements for carrying out the SA process in regulations and an associated guide. This SA has been prepared and structured in accordance with these regulations and guidance. The impacts of both the Spatial Strategy options and the Core Strategy policies have been assessed against the SA objectives. The SA objectives were developed using the key issues identified from the baseline data. The following scale was used to determine the nature of the impacts of the Core Strategy.

++	Likely to have very positive impact	
+	Likely to have positive impact	
	Likely to have very negative impact	
-	Likely to have negative impact	
I	Depends upon implementation	
0	Neutral impact identified	
?	Unknown impact	

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

The SA report is structured in the following manner:

A **non-technical summary** of this report highlights key issues and outcomes and how to comment on this SA report.

Section 1 provides an introduction and explains the SA process.

Section 2 outlines the context and relevant aspects of the current state of the environment in Lewisham (termed as the 'baseline').

Section 3 highlights the likely trends in the state of the environment in Lewisham without implementation of the Core Strategy.

Section 4 shows the main economic, environmental and social issues facing the borough.

Section 5 outlines the contents and highlights the vision and strategic objectives of the Core Strategy.

Section 6 details the sustainability appraisal objectives used to appraise the Core Strategy.

Section 7 details the SA findings, summarising the internal consistency of the SA objectives, the assessment of the Core Strategy strategic objectives, the spatial strategy, the cross cutting policies and the strategic site allocations - the likely significant effects on the environment, including short, medium and long term effects, permanent and temporary effects, positive and negative effects and secondary, cumulative and

synergistic effects on a number of sustainability related matters; measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

Section 8 outlines the cumulative and long term effects of the Core Strategy and proposed mitigation measures.

Section 9 provides a description of the measures envisaged concerning monitoring that are in accordance with Regulation 17.

1.9 Difficulties encountered in carrying out the assessment

Timing and resources have been significant challenges throughout the SA process, from beginning the scoping process to writing this version of the SA report. The benefit of conducting this work in-house has been that the officers doing this work have been able to make use of their local knowledge and contact network for carrying out the assessments.

Difficulties were encountered in compiling the baseline information and setting the appropriate indicators and targets. The SA process revealed that there was a distinct lack of monitored data available to establish a baseline of information. This had to be developed and in some cases information had to be gathered from a variety of sources to ensure that all areas were covered. The recent update of the Scoping Report has made the baseline data more reliable, but there still remain gaps in data collection which present challenges when carrying out SA of local development documents.

There was limited technical resources such as mapping and modelling software. Detailed analysis, particularly with regards to assessing cumulative and synergistic effects has proven to be harder with these limitations. Limited financial resources and time constraints has meant that there was little scope for outsourcing this work.

The know-how to carry out the appraisals for issues and options and the preferred options and the specialist knowledge required to make appropriate assessments were in some cases limited. The necessary training was undertaken by officers to ensure competency. Information was also drawn upon from other local, regional and national plans and strategies and the annual monitoring report. In addition, local knowledge and expertise from council officers, partner organisations and individuals was used to aid the assessment process.

2. Baseline and context – the current state of the environment in Lewisham

2.1 Introduction

The provision of information detailing the current state of the social, economic and natural environment in Lewisham constitutes a baseline against which the effects of the Core Strategy policies can be monitored and is a fundamental part of the Sustainability Appraisal process. Baseline information also provides the basis for predicting the likely environmental effects that may result both if the Core Strategy is, or is not implemented. The clear identification of the baseline and likely future trends is essential to the SA process as it facilitates the development of sustainability objectives that can address ways of mitigating against anticipated problems and in developing an effective and transparent monitoring strategy to measure progress in the achievement of the Core Strategy objectives.

The following section provides an outline of the current social, environmental and economic baseline characteristics for Lewisham and their likely trends if the core strategy is not implemented. A detailed list of the current baseline and associated indicators and trends was produced with the first SA Scoping Report of 2005. This has been updated to reflect subsequent changes and is provided in Appendix 11.

A number of gaps in the baseline dataset have been identified through the SA process. Gaps relate to:

- housing size, affordability, density and standard
- resident satisfaction with town centres and town centre rents
- strategic employment locations, employment areas, office floorspace, size of local businesses and vacancy rates
- crime statistics, applications referred to the design panel, conservation area appraisals, historic buildings at risk and applications affecting listed buildings and conservation areas and
- waste management and recycling facilities, renewable energy, energy consumption and emissions, contaminated sites, open space, public access, flood risk and SUDS.

Gaps in baseline data will be addressed through the monitoring process

2.2 An outline of the borough

Lewisham is Inner London's third largest borough both in terms of population and its area. Located south-east of central London, Lewisham is home to over 260,000 people⁶, and many different communities, living in an area of approximately 13.4 square miles.

Lewisham is a fantastically diverse borough, with many award winning parks and open spaces, great transport links, schools which have made significant improvements in recent years, and a thriving cultural scene. Lewisham is made up of a collection of diverse neighbourhoods and strong communities - Bellingham, Blackheath, Brockley, Catford,

⁶ The population of Lewisham is 261,600 according to ONS 2007 Mid-Year Population Estimate published on 29 September 2009

Crofton Park, Deptford, Downham, Forest Hill, Grove Park, Hither Green, Honor Oak, Ladywell, Lee Green, Lewisham, New Cross, New Cross Gate and Sydenham. This sense of place ensures that while the borough and its neighbourhoods develop, they maintain their unique identities and preserve Lewisham's rich natural and architectural heritage.

Lewisham is the 15th most ethnically diverse local authority in England where 130 different languages are spoken. The local population is forecast to rise to over 290,000 over the next 20 years by which time the proportion of the overall population from a black and/or minority ethnic origin will rise from the present 43% to almost 50%.

Adjoined by four other London boroughs⁷, Lewisham occupies a key position on important transport routes (radial and orbital) within London and between London, Kent and Sussex. These transport routes connect the borough to the rest of London, including the significant employment centres of the City of London and Canary Wharf, the leisure and retail destinations of the West End, Croydon and Bromley, as well as the key sites for the 2012 Olympics. Proposals for new and upgraded transport services will further enhance these connections.

Strategically, the north of the borough forms part of the Thames Gateway, a nationally recognised growth area stretching east to the Kent and Essex coasts along the Thames Estuary⁸. Lewisham, Catford, New Cross and Deptford are identified as opportunity areas in the London Plan and are expected to be able to accommodate substantial new jobs and/or homes. The borough also contains two strategic industrial locations (Bromley Road and Surrey Canal Road) identified in the London Plan and is expected to provide 975 new homes per year up to 2016⁹.

The borough is primarily residential in nature, ranging from a suburban character in the south to higher density 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, conservation areas and railway corridors. There are 26 conservation areas covering approximately 654 ha and 516 listed buildings. The borough falls within the catchment of the River Ravensbourne and its tributaries, along which are located many significant areas of green space, including Waterlink Way. Some parts of the borough fall within an area of flood risk although importantly most of the borough is protected by flood defences, including the Thames Barrier.

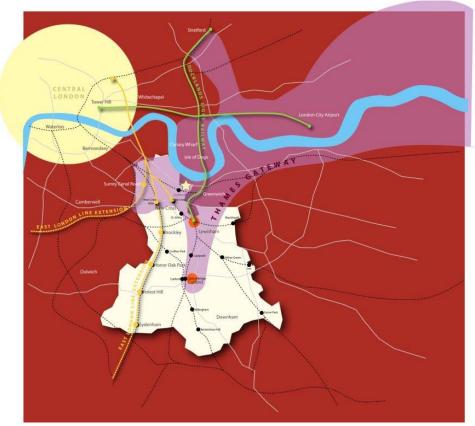
⁹ London Plan Policy 3A.2

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⁷ Greenwich, Southwark, Bromley and Tower Hamlets (across the River Thames)

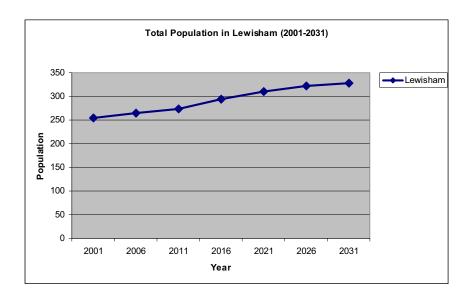
⁸ As designated in the Sustainable Communities Plan (Sustainable Communities: Building for the future 2003)

London Borough of Lewisham within its wider strategic context



2.3 People

The population of Lewisham grew by 3% between 2001 and 2008. It is forecast to increase by almost a quarter (64,300) between 2006 and 2031¹⁰. Children and young people (0-19 years) make up a quarter of the population ¹¹.of one the highest proportions in London. Elderly residents (over 75 years) make up just 5%. The average age of the population is 34.7 years and is young when compared to other London boroughs. The wards with the youngest populations are Evelyn and New Cross located in the north of the borough.

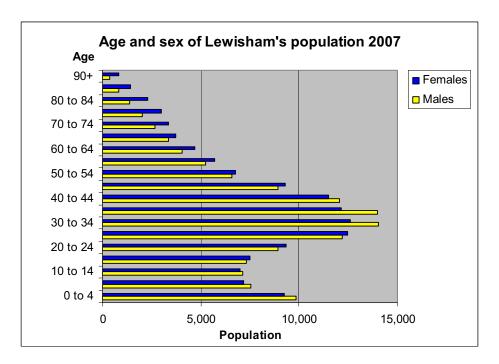


¹⁰ Greater London Authority 2008 Round of Demographic Projections, RLP High

¹¹ Census 2001

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.

Between 2005 and 2007, the average life expectancy at birth for men in Lewisham was 76 years compared with 77.3 years in England. For the same period life expectancy for women was 80.8 years in Lewisham compared with 81.5 years in England 12. The population was more or less evenly split between males and females and these proportions are not expected to change in the period to 2014¹³.



The Council believes there has been a growth in all groups of the black and minority ethnic (BME) population since the 2001 Census. This has risen from 39% of households to nearly half of all households in 2007, who largely live in the northern and central parts of the borough¹⁴.

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 Lewisham¹⁵.

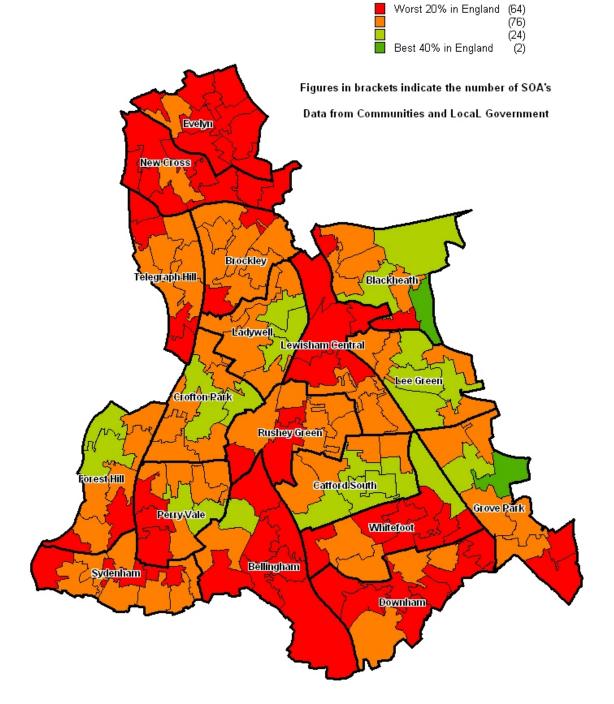
The Index of Multiple Deprivation (IMD 2007) saw Lewisham ranked as the 39th most deprived local authority in England, with a number of areas ranked in the 20% most deprived in England. The IMD looks at a range of indicators covering income, employment, health, education, training, skills, living conditions and access to services. The figure below shows

¹² JSNA, NHS Lewisham

¹³ Male 49% and female 51%

¹⁴ BME population estimated at 49.4% of households as evidenced through the Lewisham Household Survey 2007 for the Strategic Housing Market Assessment

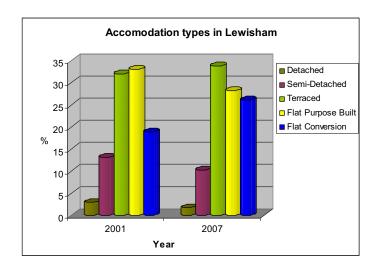
¹⁵ JSNA, NHS Lewisham



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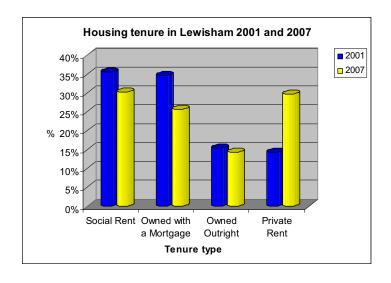
2.4 Housing

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 ¹⁶.



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 bedrooms¹⁷.

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 29.8% in 2007. Conversely social rented properties have fallen from 35.6% in 2001 to 30.2% in 2007, while properties owned outright or with a mortgage have decreased from 50% in 2001 to 40% in 2007¹⁸.



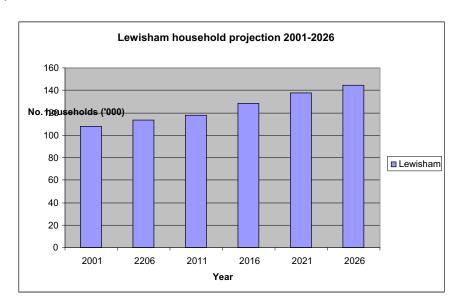
¹⁶ Lewisham Household Survey 2007, SHMA 2008

¹⁷ Lewisham Household Survey 2007, SHMA 2008

¹⁸ Census 2001 and Lewisham Household Survey 2007, SHMA 2008

A total of 33,922 households ¹⁹ were assessed as living in unsuitable housing due to one or more factors. 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, Lewisham Town Centre and Bellingham are the areas in the borough most likely to contain unsuitably housed households ²⁰ which corresponds to areas identified with higher levels of deprivation.



Affordability of a home 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)²¹. This is particularly relevant given that the Lewisham Household Survey for the SHMA asked a question about household income. This included gross household income from all sources such as earnings, pensions, interest on savings, rent from property and state benefits. While just under a fifth²² of households have an income of over £40,000, however nearly half of all households have an income of less than £15,000 ²³.

2.5 Jobs

Despite being the third most populous inner London borough, Lewisham's underlying economy is one of the smallest in London, ranking 30th out of 33 ²⁴. The borough workforce numbered around 66,000 in 2006 – a rise of 8% since 1998 ²⁵. This is in line with regional and national averages, but below the sub-regional average. The majority of Lewisham's population travel outside the borough to work.

¹⁹ Lewisham Household Survey 2007, SHMA 2008

²⁰ Lewisham Household Survey 2007, SHMA 2008

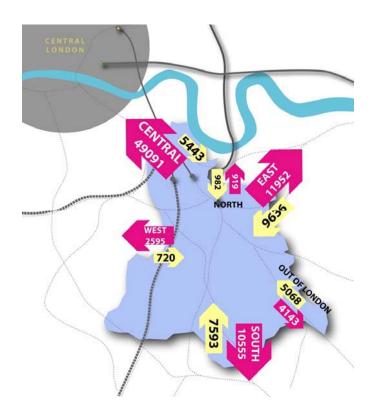
²¹ Land Registry, March 2009

²² 19%

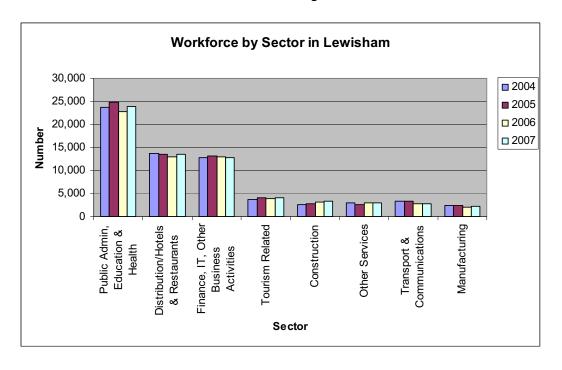
²³ 48%

²⁴ Lewisham Economic Development Business Plan 2004

²⁵ Lewisham Employment Lands Study 2008 (ELS)



Town centres are key locations of economic activity and employment in the borough. The largest employer is the Public, Education and Health Services sector, with 38% (22,807) of jobs in 2006 ²⁶. The over-reliance on the public sector may limit opportunities for enterprise driven by the private sector ²⁷. Distribution, Hotels and Restaurants (mostly retail), and the Banking and Finance sectors are the next largest employment sector with 22% each (12,800) employees. The broad employment categories are expected given Lewisham's place in recent times as a London residential borough.



²⁶ Chapter 3, ELS

²⁷ Chapter 3, ELS

The borough lost nearly a third of it's already fragile industrial base between 2000 and 2004, whilst and the stock of commercial property has decreased in recent times. Commercial and industrial stock shrunk by 8.7% between 1985 and 2003²⁸.

The overall employment figure for Lewisham, including those working in and out of the borough, was 132,700 at December 2005, with an increase of approximately 2,700 between 2000 and 2005²⁹. The unemployment rate for 2009 was estimated at 7.8% (equivalent to approximately 11,300 people) and was slightly higher when compared with London as a whole (7.4%). The percentage of the working population claiming Job Seeker's Allowance (JSA) was 4.5% in September 2009 ³⁰.

There is a strong recognition of the importance of creative industries to the borough's economy, with these activities currently clustered in parts of Deptford, New Cross and Forest Hill. The borough has particular advantages for business such as good public transport communication, and a good representation in a number of growing sectors. Working residents show some signs of well being, with high economic activity levels and nearly a third or residents are qualified to a degree level or beyond³¹.

Lewisham's economy, by London terms, has a relatively small proportion of knowledge based jobs in the borough which has continued to decline when compared with London as a whole. Generally there is a greater reliance on employment in the public sector, education and retail. Many of the local jobs can be considered relatively low value in output, which reflects the relatively low wage levels. The over-reliance on the public sector accounting for one third of local jobs may also limit opportunities for enterprise driven by the private sector³².

Between 2006 and 2026, Lewisham's total employment numbers is forecast to grow by 16,950 jobs or 847 jobs per year. This is a 21% increase over the plan period, which is in line with the London average of 20%. The bulk of this growth is accounted for in the business class sectors (e.g. retail), which grow by 465 jobs per year, closely followed by office employment, gaining approximately 400 jobs per year. Industrial and warehousing change is insignificant by comparison. Office jobs are forecast to grow by 52% compared to a regional average of 41%, while industrial jobs fall 5%, which is below the London average of 8% ³³.

The forecast demand for business (employment) floorspace based on these growth projections is for a net increase of some 132,500 square metres of office space i.e. 6,600 square metres per year, and a net fall of 15,500 square metres in industrial space i.e. 770 square metres per year. In the Lewisham context, this increase in demand for floorspace is expected to come from businesses offering services to central London that can occupy a variety of flexible commercial buildings rather than traditional office space. Demand for 117,000 square metres or 5,850 square metres per annum of net additional business space

²⁹ ELS

 $^{^{28}}$ ELS

³⁰ Nomis, September 2009

³¹ Chapter 3, ELS

³² Chapter 3, ELS

³³ Chapter 5 ELS

is projected for the period 2006 to 2026³⁴. The expected growth of London's economy, together with the associated expansion in service industries, culture, leisure and education, should generate opportunities for locations such as Lewisham to provide space for the many businesses serving these main drivers in the London economy.

2.6 Town centres

The borough has two major town centres in Lewisham and Catford offering a wide range of retail, commercial and entertainment services. Supporting the major centres are a network of seven district town centres ³⁵, two out-of-centre retail parks ³⁶ and five neighbourhood centres ³⁷. This is supported by over 80 local parades and a range of street and farmers' markets scattered throughout the borough.

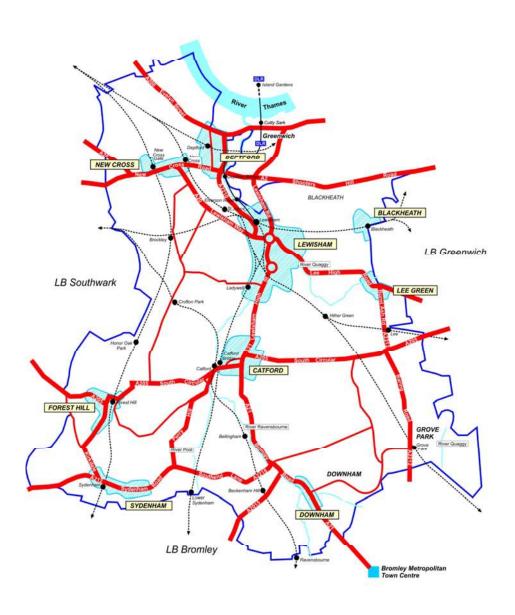
³⁴ Chapter 6 ELS

³⁵ Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross, Sydenham

³⁶ Bell Green and Bromley Road/Ravensbourne Retail Park

³⁷ Brockley Cross, Crofton Park, Downham Way, Grove Park, Lewisham Way

LBL Town Centres



Geographic Information & Research 2005 Town Centres.cdr As the larger of the two major town centres, Lewisham has a total floorspace of over 80,000 square metres (gross), with 330 shops and businesses³⁸. Catford has a total floorspace of around 48,800 square metres (gross) within 233 shops and businesses³⁹. There is a strong desire to see an improvement in the retail mix within both major town centres and a higher provision in comparison goods as opposed to growth in convenience shopping (non-food vs. food and every day items).

The Council's Retail Capacity Study ⁴⁰ indicates that the minimum objective of the Council's retail strategy should be to safeguard the borough's existing shopping role and market share within the sub-region in face of competition from, in particular, Bromley and Croydon, and that there is sufficient spending capacity within the borough to support the expansion of some centres and for Lewisham Town Centre to achieve metropolitan status⁴¹. The latter requires a minimum additional 20,000 square metres of retail floorspace and is based on the assumption that the comparison goods market share of Lewisham will increase by 10% if committed developments are implemented.

Major centres located just beyond the borough boundaries likely to have an impact on Lewisham's retail centres include Canary Wharf, London's West End, Canada Water/Surrey Quays, Croydon, Bromley and Bluewater (Kent), and the forthcoming development in Stratford.

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2.7 Transport

Lewisham is criss-crossed by the London Strategic Road network with the A2, A20, A21 and the A205. Within Lewisham there are 20 railway stations, 3 DLR stations, 2 London underground stations and 42 bus routes. Some parts of Lewisham enjoy good rail links to central London. The southern extension of the Docklands Light Railway (DLR) to Lewisham has enhanced the attractiveness and accessibility to other parts of London, in particular Canary Wharf.

According to the 2001 census about 32% of people in employment travel to work by car, motorcycle or taxi, about 50% use public transport, 7% work from home and just over 8% walk or cycle. Over 40% ⁴² of households do not own a car, ranging from 55.8% in the north of the borough in New Cross to 32.8% in the south in Grove Park⁴³. Wards in the north of the borough (Brockley, Evelyn, New Cross, Lewisham Central and Telegraph Hill) show higher rates of non-car ownership than the rest of the borough, and are therefore more dependent on public transport provision. However, the demand for on-street parking in residential areas remains high.

-

³⁸ 80,490 square metres, Lewisham Retail Capacity Study (RCS) Nathaniel Litchfield 2009, para. 3.17

³⁹ RCS 2009, para. 3.26

⁴⁰ RCS 2009, para. 7.4

⁴¹ RCS 2009, paras. 7.6-7.8

⁴² 42.8%, Census 2001

⁴³ Census 2001

A number of transport infrastructure schemes are proposed for Lewisham over the next five years or more. These will help to alleviate some of the transport problems in Lewisham including overcrowding on public transport, significant air pollution levels on major roads, improve accessibility throughout the Borough and reduce the travel distance for basic goods and services. Some of the key proposals include:

- East London Underground Line extension (ELLX) (Phase 1 and 2 to become part of the London Overground network)
- London Bus Priority Network
- Capacity improvements for passengers on rail lines
- Three car capacity for the Docklands Light Railway
- Thameslink 2000.

2.8 Open space and environmental assets

Despite its inner London location, 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. There are 60 sites designated as Sites of Nature Conservation Importance including 19 Local Nature Reserves. In addition the River Thames and other waterways, private garden areas, and railway line-sides provide valuable habitats for wildlife in the borough. Approximately one fifth of the borough is considered to be deficient in open space, and with increasing pressures to build, the borough aspires to protect all its green space.

Lewisham falls within the catchment of the River Ravensbourne. This river has three main tributaries (the rivers Pool, Quaggy and Spring Brook) and runs directly through the borough from Beckenham Place Park in the south to where it enters the Thames at Deptford Creek.

Many of the significant areas of green space in the borough are beside the rivers, primarily because of the historical recognition that building on the floodplain was not a sensible option. However, in the latter part of the 20th century, building has encroached on to the flood plain and has led to the concrete channelisation of the river in many places. The River Ravensbourne in particular, is recognised as one of the most engineered rivers in metropolitan London. These actions have resulted in a loss of biodiversity in the area. The effects of climate change, notably global warming and an associated rise in sea levels are likely to affect both the natural and the built environment of Lewisham due to adverse weather patterns and flood risk and are likely to further exacerbate the decline in the borough's biodiversity. Parts of the borough lie in areas that are at risk of flooding, although most of these areas are protected by flood defences including the Thames Barrier.

2.9 Climate change

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 ⁴⁴ and limited water resources including drought, all impacting our quality of life.

A significant contributor to climate change is the concentration of carbon dioxide in the atmosphere. Key figures relating to CO₂ emissions include⁴⁵:

- UK total emissions in 2005 were 545 million tonnes a year, representing an estimated 2% of global emissions.
- CO₂ accounted for 85% of the UK's man-made greenhouse gas emissions in 2006.
- London's total CO₂ emissions in 2005 were 50 million tonnes or 9% of the total UK average.
- Lewisham is the second lowest London borough for per capita CO₂ emissions and 12th out of 33 in terms of total emissions The London average per capita is 6.9 tonnes per head of population with Lewisham at 5 tonnes, AEA Energy and Environment/DEFRA 2005.
- Lewisham has a distinctly different profile for emissions by sector from the national and London average AEA Energy and Environment/DEFRA 2005.

A comparison of Lewisham to London and the UK is shown in the table below.

CO ₂ emissions by sector					
	Industry and commercial	Domestic	Road transport		
Lewisham	26%	44%	30%		
London	42%	33%	24%		
UK	45%	27%	27%		

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 46. It also notes that the domestic sector could contribute 39% of the total savings of 20 million tonnes of CO₂ identified in the Mayor's Climate Change Strategy. Improving housing standards, insulation and energy efficiency, and providing sustainable decentralised energy can all contribute to reducing emission levels.

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 CO₂ emissions. To implement its goals the Council has a Corporate Sustainability Board and in July 2008 published a Carbon

⁴⁴ Where temperatures in urban areas, particularly at night are warmer than non-urban areas

⁴⁵ As identified in the Council's Carbon Reduction and Climate Change Strategy, 2008

⁴⁶ Housing in London: The Evidence Base for the Mayor's Housing Strategy, September 2007

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 CO₂ emissions in London.

2.10 Waste management

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 2007/08 only 10% was sent to landfill. The borough incinerates 73% and recycles and composts 22% of its household waste. The Council aims to further 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 2010/11⁴⁷. 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 2020⁴⁸. 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 London⁴⁹.

2.11 Flood risk

The northern proportion of the borough is situated immediately adjacent to the River Thames for approximately one kilometre. The River Ravensbourne and River Quaggy are also key features of the borough. At least one-fifth of all residential and non-residential properties in the borough are at some risk of flooding ⁵⁰ from these sources. While the Thames poses a potential risk of flooding to properties within this area of river frontage, properties are currently protected from flooding by the River Thames Tidal Defences up to the 1 in 1,000 year event.

Properties within the vicinity of the River Ravensbourne or the River Quaggy corridors are subject to a potential risk of fluvial (river) flooding. Investment has been placed into flood defence to reduce the risk of flooding, particularly within Lewisham town centre, however fluvial flooding remains a threat to property (and potentially life) within the borough⁵¹.

A potential risk of flooding from other (non river related) sources 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

⁴⁷ Lewisham Draft Municipal Waste Strategy 2008

⁴⁸ London Plan policy 4A.25 and Table 4A.6

⁴⁹ Southeast London Boroughs' Joint Waste Apportionment Technical Paper, 2009

⁵⁰ Strategic Flood Risk Assessment, 2008 (SFRA)

⁵¹ SFRA

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 years⁵².

2.12 Local air quality

There are five air quality management areas (AQMAs) in the borough, located where the level of pollutants is higher than the acceptable threshold. 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.

The Council's third review and assessment (Updating and Screening Assessment) of air quality was conducted in July 2006. 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, continue the programme of monitoring and consider an expansion of the current monitoring stations to locations where fugitive sources are known to be an issue⁵³.

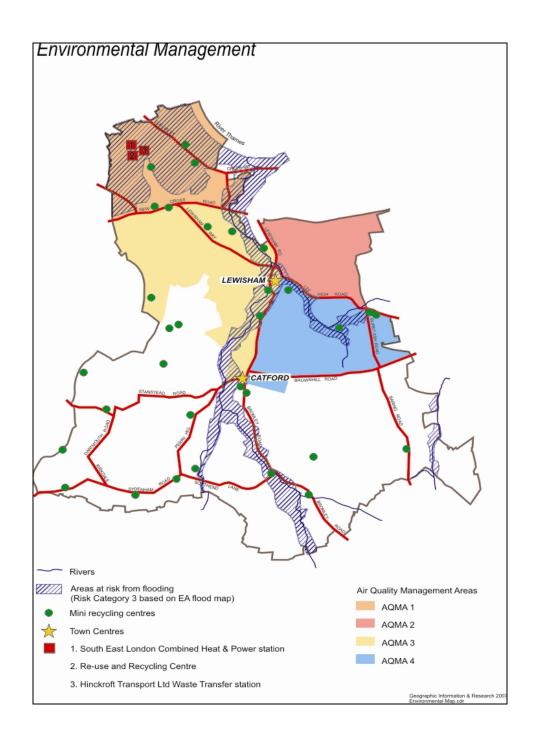
The Council adopted an Air Quality Action Plan in 2008. The focus of which is mainly concerned with reducing emissions from road transport, with an emphasis on balancing supply side measures, such as improved walking, cycling and public transport, and demand side management, such as traffic restraint 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 borough's air quality will remain an important issue that needs to be addressed and can be linked to the type of development taking place and its location, the way people travel, restraining car use, and focusing people in areas where a full range of facilities are at their doorstep.

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⁵² SFRA

⁵³ Air Quality Action Plan 2008



2.13 Community and infrastructure

Lewisham has 69 primary schools and 11 secondary schools. There is currently a shortage of secondary school places in the borough, leading to many students attending schools in the boroughs of Bromley and Greenwich. The Council has been awarded £186 million through the Building Schools for the Future (BSF) Programme to rebuild or refurbish every secondary school in the borough within the next decade. Primary schools will be refurbished through the Primary Futures programme.

Further education facilities are provided on two campuses by Lewisham College at Brockley and Deptford. Goldsmiths College (University of London) at its New Cross campus provides higher education facilities with a focus on creativity, culture and digital technologies.

NHS Lewisham outlines a strategic plan to develop polysystems in Lewisham over the next five years. It is envisaged that this will be a mix of single site and more virtual based arrangements linking a number of buildings with a hub. Core services will include:

- general and specialist GP services
- community services
- minor procedures
- diagnostics
- secondary care outpatient consultations
- health promotion and prevention, and well-being.

Currently there are more than 150 GPs based in 48 surgeries, and a range of community health services including foot health, sexual and reproductive health, community nursing services, stop smoking and mental health services throughout the borough. There are 51 pharmacies and approximately 116 dentists working out of 37 practices. There are also many opticians. There is a general hospital (University Hospital Lewisham) providing a range of acute services, including an Accident and Emergency service and a centre for children with special needs.

In supporting the community, Lewisham has 49 community centres, 12 libraries, 8 leisure locations with swimming pools and 44 with sports halls, as well as 104 grass sports pitches and 100 children's play areas⁵⁴.

Lewisham has generally had lower levels of crime than most of the other inner London boroughs⁵⁵, although the fear of crime is a key issue⁵⁶.

Currently 90% of resident primary school children attend school within the borough. Whilst 10% of children do not attend schools in the borough this could be attributed to school catchment areas that cross the borough boundary. In secondary schools, however, only 65% of resident's children attend school within the borough. Whilst there are some pupils that travel into the borough, this leakage leads to a net shortfall in pupils.

The government is committed to spending £2.2 billion per year over the next 15 to 20 years to replace, rebuild or renovate every secondary school in England. Lewisham has been awarded £186 million for this purpose. It is proposed that by 2013 all Lewisham's secondary schools will have been improved under this programme providing better educational facilities for staff and pupils.

When compared with inner London boroughs, Lewisham has a low overall crime rate with 35 crimes per 1,000 population, with only Wandsworth having a lower crime rate. The London average is approximately 34 crimes committed per 1,000 population (Home Office Crime Statistics 2005/06).

Lewisham Social Infrastructure Framework 2008
 Metropolitan Police Service

⁵⁶ Residents Survey 2007

3. Likely trend in Lewisham's environment without implementation of the Core Strategy

A detailed list of decision aiding questions to show the likely trends in Lewisham if the Core Strategy is not implemented is provided in Appendix 10. The broad effect of these likely trends, combined with the lack of an integrated, long term vision and strategy is that the substantial existing opportunities to address long term issues in the borough may be lost, and development will proceed in a piecemeal and ad-hoc manner, reducing the potential benefits to the community. The principal effects of these trends are listed below.

3.1 Socio-economic trends

- Opportunities to comprehensively address long term deprivation (impacting health, education and the overall quality of life), particularly within the Evelyn and New Cross wards in the north of the borough and the Bellingham, Downham and Whitefoot wards in the south of the borough, will be significantly reduced as development opportunities will be restricted thereby limiting comprehensive physical, social and environmental regeneration.
- Opportunities to boost Lewisham's small local economy and local employment by promoting the innovative mixed use developments of a sufficient scale to contribute to long term physical, social and environmental regeneration will be lost.
- Lewisham will be unlikely to meet the projected housing needs for existing and future residents, which includes the London Plan target of 975 dwellings per annum during the Core Strategy period.
- Provision of infrastructure funded through developer contributions, including health, education, open space and recreational facilities will be reduced and may not come forward as the quantum of development will be less.
- Naturalisation and improvements to the river and waterways network will be limited as funding would be part secured from new development.

3.2 Environmental trends

- Opportunities to implement sustainable design for the new built environment, including living roofs and walls, energy efficient designs and measures to reduce the risk of flooding may not be fully realised.
- Road traffic will remain the main source of air pollution as additional opportunities to
 provide for sustainable modes of transport such as walking, cycling and public
 transport improvements in the borough will be lost. Opportunities to reduce local car
 based travel may also be lost if the development of required services within the
 borough is not facilitated.

- Opportunities to seek additional open space to meet the future population demand, improve accessibility to, and connectivity between open space in the borough will be reduced.
- Opportunities to protect, create and enhance biodiversity habitats in the borough, including naturalising local rivers may not be realised.
- Opportunities for public realm improvements, particularly within the major town centres and the regeneration and growth areas may be lost.
- Opportunities to maximise the efficient use of land and use existing infrastructure better in order to accommodate the projected increase in population will not be realised.
- The impact on the existing reserve of natural resources such as water, oil and gas is
 likely to be positive. The promotion of sustainable modes of transport, good design and
 sustainable construction techniques are likely to outweigh the positive impacts
 identified in this status- quo scenario.
- Opportunities to promote a sufficient number of waste facilities to meet the existing and future demand is likely to be missed. However, there will be less waste if the Core Strategy is not implemented.

4. Main economic, environmental and social issues facing Lewisham

4.1 Identified issues

Building on section 2, the outline of the current state of Lewisham's environment allows the identification of the significant existing and emerging economic, environmental and social issues (i.e. the sustainability issues) facing the borough.

The key sustainability issues facing the borough are listed in the following table along with source documents that constitute the evidence base for these. This is followed by an assessment of the impacts of the Core Strategy policies on The EC Habitats Directive. Together these have been used to formulate the SA objectives used in this report to appraise the sustainability of the Core Strategy. The issues which are not considered to be relevant to Lewisham or the area of impact are excluded from the assessment.

The sustainability objectives are outlined in Section 6 and Appendix 10.

The main social, environmental and economic issues facing the borough

Key issues	Source
Economic	
Limited employment opportunities outside of public sector High commuter population working outside of Lewisham Need to create employment and training opportunities in the borough to create a more sustainable environment and enhance the local economy	 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
Varied levels of growth in local shopping areas With predicted population growth there is a need for enhancing the vitality of the local shopping areas to improve the local economy and reduce the need to travel outside the borough for goods and services	 Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 Lewisham Retail Capacity Study 2009 Lewisham Town Centre Health Check Report 2008/09 London-wide Town Centre Health Checks Analysis 2008 Town Centre Management Strategy 2007-2010 B Managing the Night Time Economy 2007

Key issues Source Lewisham Employment Land Study 2008 Provision of adequate employment land to support business enterprise Lewisham Economic Development Business Plan 2004 (Ancer Spa) Sufficient employment land will need to be Local Futures: The State of the Borough protect and new land sought to improve the 2004 overall economy of the borough. Lewisham Local Cultural Strategy 2002 Opportunities need to be taken to support employment growth sectors Finding a balance between meeting Lewisham Employment Land Study 2008 housing targets and maintaining Lewisham Strategic Housing Market economic and cultural vitality Assessment 2008 South-east London Sub Regional Strategic A general conflict between meeting Housing Market Assessment 2009 housing targets and protecting sites for • Lewisham Economic Development other uses such as employment, retail, Business Plan 2004 (Ancer Spa) education, health, community in a built up environment. **Environmental** Protect and improve biodiversity and Shaping our Future Lewisham's natural habitats including local Sustainable Community Strategy 2008-20 waterways Lewisham Leisure and Open Space Study • Lewisham (A natural renaissance for Brownfield sites are important habitat for local species. Species such as the stag Lewisham) Biodiversity Action Plan 2006 beetle, house sparrow and black redstart Thames Strategy East 2008 are local to this area but numbers have • Green Chain Policy Document 1977 suffered marked declines. The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration. CO₂ emissions contributing to climate Shaping our Future Lewisham's change Sustainable Community Strategy 2008-20 Carbon Reduction and Climate Change Climatic changes due to greenhouse gas Strategy 2008 emissions from fossil fuel use are likely to Lewisham Energy Strategy affect the natural environment. The built Air Quality Action Plan 2008 environment will need to adapt to these • Lewisham Renewable Energy Study 2009 changes and find ways of reducing carbon Strategic Flood Risk Assessment 2008 emissions, including developing viable Sequential Test 2009 decentralised renewable energy networks • Local Implementation (Transport) Plan

2009

to supply energy to new and existing

developments.

Key issues Source Traffic congestion and car dependence Shaping our Future Lewisham's Sustainable Community Strategy 2008-A growing population will increase 2020 movement, placing pressure on the road • Local Implementation (Transport) Plan network and existing public transport. 2006 There is a need to locate development North Lewisham Links Strategy 2007 near existing transport links and improve Waterlink Way walking and cycling routes and public • Ravensbourne River Corridor Improvement transport; and adopt a managed and Plan (draft) restrained approach to car parking. High levels of air and noise pollution • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 due to traffic Air Quality Action Plan 2008 • Local Implementation (Transport) Plan Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted Borough-wide Transport Study 2009 • Health Issues in Planning, Best Practice population growth there is a current and future need to increase the use of Guidance 2007 sustainable modes of transport and reduce • Transport 2025, Transport vision for a carbon emissions. growing world city, November 2006 Protect cultural, archaeological and • Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 historic heritage from redevelopment Deptford New Cross Masterplan 2007 • Lewisham Local Cultural Strategy 2002 Lewisham has two Grade I listed buildings, • Lewisham Conservation Area Appraisals a number of Grade II buildings and many locally listed buildings and conservation and Management Plans areas. The borough has its own Lewisham Local List (under Revision) architectural identity and character and the Listed Buildings best part should be preserved. Lewisham UDP Schedules 1A, 3 and 5 Lewisham Leisure and Open Space Study 2009 The Deptford New Cross area and the · Shaping our Future Lewisham's areas along the borough's river network Sustainable Community Strategy 2008-20 are within the Flood Risk 3a (high Lewisham Strategic Flood Risk probability) category Assessment 2008 Sequential Test 2009 Climate change is predicted to increase • Ravensbourne River Corridor Improvement adverse weather patterns, leading to more Plan (draft) intense and severe flooding in flood risk Lewisham Leisure and Open Space Study areas. There is a need to reduce flooding 2009

and manage risk.

Key issues Source Aging housing stock and poor levels of Shaping our Future Lewisham's insulation Sustainable Community Strategy 2008-20 · Lewisham Strategic Housing Market The existing housing stock will require Assessment 2008 updating with improvements in energy South-East London Sub Regional Strategic efficiency and increases in building Housing Market Assessment 2009 Standard Assessment Procedure ratings Lewisham Housing Strategy (current SAP rating are 46 out of 100) Lewisham Energy Strategy (29.4% of residents are living in unsuitable housing) Low levels of recycling and the need to Shaping our Future Lewisham's reduce total waste production Sustainable Community Strategy 2008-20 South East London Boroughs' Joint Waste Apportionment Technical Paper There is a need to reduce waste generation and improve recycling and Lewisham (Draft) Waste Management composting rates. Final disposal of waste Strategy 2008 is a problem due to lack of land for such a low value use and negative public opinion of living in the vicinity of such facilities. With requirements for managing our waste within the borough boundaries and proposals for waste allocated to Lewisham from inner city boroughs this issue will become increasingly important. Social High demand for housing, house prices · Shaping our Future Lewisham's and continuous growth in population. Sustainable Community Strategy 2008-20 • Strategic Housing Market Assessment The population is forecasted to rise. The 2008 Mayor of London requires 9,750 new South East London Sub Regional Strategic residential units to be built in Lewisham by Housing Market Assessment 2009 2017. The average income of the majority Housing Strategy 2009 of households is insufficient to buy a • Children and Young Peoples Plan house. Improved access to health care, Shaping our Future Lewisham's education and community facilities Sustainable Community Strategy 2008-20 • Lewisham Social Inclusion Strategy 2005 Ensure that improved and accessible Lewisham NHS Estate Strategy health, education and community facilities Lewisham NHS Commissioning Strategy are provided to accommodate the needs • Local Education Authority School Plan arising from new developments and Lewisham Infrastructure Delivery Plan meeting existing needs. · Lewisham Physical Activity, Sport and Leisure Strategy 2006

Lewisham School Sports Facility Strategy

2006

Key issues	Source
Low levels of educational attainment There is a need to improve the educational attainment of students in primary and secondary schools.	 Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 Local Education Authority School Plan Lewisham School Sports Facility Strategy 2006
General perception of high crime rates in Lewisham 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.	 Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 Lewisham Social Inclusion Strategy 2005 Lewisham Local Cultural Strategy 2002
Addressing deprivation, social exclusion and health inequalities 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. There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.	 Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 Indices of Multiple Deprivation 2007 Joint Strategic Needs Assessment
Provision of open space and recreational facilities With future growth in the housing sector the proportion of open space per 1000 population will be reduced. Opportunities arising to provide additional open spaces from potential developments must be utilised to improve health and well-being in the borough.	 Shaping our Future Lewisham's Sustainable Community Strategy 2008-20 Lewisham Leisure and Open Space Study 2009 Lewisham Physical Activity, Sport and Leisure Strategy 2006 Green Chain Policy Document 1977

4.2 European Habitats Directive

Directive 92/43/EEC (the Habitats Directive) on the Conservation of Natural Habitats and of Wild Fauna and Flora, requires an Appropriate Assessment (AA) to be undertaken to assess the impacts of a land-use plan (such as the core strategy) against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity

of that site. Where significant negative effects are identified, alternative options should be examined to avoid any potential damaging effects.

The Council has carried out this assessment which concludes that the spatial strategy, the cross cutting policies and the strategic site allocations of the Core Strategy have been found to have no likely significant effects on any designated European sites. The AA is provided in Appendix 2 to this report.

5. Sustainability appraisal objectives

There are no explicit regulatory requirements to prepare SA objectives against which the objectives and policies of the Core Strategy can be measured. However, this approach is a recognised way of considering the economic, environmental and social effects of the proposed Core Strategy in a transparent and open manner. SA objectives can be used to demonstrate how beneficial the Core Strategy objectives and policies are to the social, environmental and economic environment, and can recommend improvements to improve the overall benefit to the community. The use of indicators and targets to measure the progress made towards the achievement of these objectives are also useful for future monitoring of the Core Strategy in a transparent manner. Accordingly, Government guidance on preparing SAs recommends the development of SA objectives and indicators and targets.

The SA objectives contained in this report have been slightly modified following a review of both the baseline characteristics of the borough outlined in Sections 2 and 4, and the list of SA objectives included in the earlier stages of the SA process. In most instances, minor wording additions were made to aid clarity in understanding the objective, reflect the appraisal findings and the priorities for Council highlighted through the evidence base. However, SA objective 5 dealing with open space and biodiversity was split into two separate objectives to reflect the distinct differences between these two issues and the measures needed to achieve them. The changes to the objectives are marked in blue italics.

The SA objectives are grouped into three themes and are listed below. They will be used to appraise the Core Strategy strategic objectives, the spatial strategy, the cross cutting and thematic policies and the strategic site allocations. A series of appraisal questions relating to each SA objective and specific to the London Borough of Lewisham will be used to facilitate this process. The indicators and targets chosen to measure these objectives have been derived from a range of sources including the Council's AMR and census data.

The full list of SA objectives, the appraisal questions, targets and indicators is provided in Appendices 9 and 10.

Economic

- 1. To encourage sustained economic growth across a variety of sectors
- 2. To encourage and promote employment and new enterprises in Lewisham

Environmental

- 3. To minimise the production of waste *across all sectors* and increase *reuse*, waste recovery and recycling *rates*
- 4. To use and manage the consumption of natural resources in a sustainable manner
- 5. To protect and enhance the borough's open spaces maintain and enhance open space, biodiversity, flora and fauna

⁵⁷ 'A Practical Guide to the Strategic Environmental Assessment Directive' (September 2005), The Office of the Deputy Prime Minister (ODPM)

- 6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna and increase peoples access to nature in all areas of the borough
- 7. To improve air quality and reduce noise and vibration
- 8. To reduce car travel and improve accessibility by sustainable modes of transport
- 9. To mitigate and adapt to the impact of climate change
- 10. To minimise and mitigate reduce and manage flood risk
- 11. To maintain and enhance landscapes and townscapes
- 12. To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough

Social

- To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home
- 14. To improve the health and well-being of the population and reduce inequalities in health
- 15. To reduce poverty address deprivation, promote social inclusion and ensure equitable outcomes for all communities
- 16. To provide for the improvement of education, skills and training
- To reduce crime enhance community safety by reducing crime, anti-social behaviour and the fear of crime
- 18. To encourage a sense of community identity, social cohesion and civic participation
- 19. To improve accessibility to leisure facilities, community infrastructure and key local services

6. Core Strategy options and alternatives

The Lewisham Core Strategy sets out the vision, objectives, strategy and policies that will guide public and private sector investment to manage development and regeneration in the borough over the next 15 years. The Core strategy is based upon a vision for the type of place the borough will be in 2026, the key drivers of change which impact on the borough now and in the future, and the need to ensure that any change is maximised for the long-term benefit of all in the Lewisham community.

6.1 Preparing the core strategy and considering options and alternatives

This section provides a discussion on the consideration of options and alternatives for the Core Strategy. This relates to the strategic spatial options and the cross cutting policies.

In developing the spatial strategy and policies for the Core Strategy broad topics covering a range of specific issues and options were presented for public consultation. The options for each topic were assessed against the sustainability objectives with the underlying assumption that all other policies remain unchanged as per the current UDP or 'status quo' scenario. Details can be found within the SA reports for the Core Strategy Preferred Options (2007) and the Core Strategy Options Report (2009). A summary of each option and the outcome for the proposed submission version of the Core Strategy is included as Appendix 11.

6.1.1 Strategic spatial options

The identification of the initial issues and options came from a variety of sources. These ranged from national and regional strategic directions, local community and corporate plans and strategies and public consultation. Figure 6.1 shows the process taken to identify the strategic options that would form the basis for the Core Strategy's spatial strategy to guide regeneration and development across Lewisham.

The initial three selected growth scenarios (strategic options) were:

- 1. promote growth through major housing provision
- 2. promote growth through mixed use redevelopment
- promote limited growth and adopt a protective approach to existing employment designations.

The evidence base at the time showed that the population of the borough was expected to grow by approximately 28,000 people between 2001 and 2016 (GLA, *Mid year population estimates*, 2005). Therefore there is a need for increasing housing provision and related infrastructure. The internal economy of the borough is one of the smallest in London and the majority of the population work within the public sector. A mixed use approach would provide opportunities for economic growth and regeneration of the borough. A protective approach on the other hand would protect the borough's character and secure designated employment sites from being redeveloped to other uses.

From this selection, the preferred choice presented through the Core Strategy Preferred Options (2007) was 'to promote major growth in the most sustainable areas and maximise the scarce land resource by promoting mixed use redevelopment in suitable locations'. The identification of this strategic option was due to the need for balance in all the requirements by creating sustainable communities, including space for employment activities, retail, leisure, health, education, the natural environment and transport. This would ensure that as the economy changes, the viability of sites would still be realised.

This strategic option was further developed as part of the Core Strategy Options Report (2009), which presented two strategic spatial options to guide regeneration and growth across the borough.

Option 1 was presented as supporting borough-wide regeneration and growth and included several former business (services and manufacturing) sites in north Deptford as appropriate for regeneration and growth and the provision of new jobs and homes, along with intensifying mixed use development in the Lewisham and Catford town centres. The Council believed this would enable local environmental improvements to be made and development was generally focussed in areas with higher public transport accessibility.

Option 2 was presented as moderate regeneration and growth and proposed a more modest approach to development, and as such did not include the north Deptford sites as appropriate for redevelopment, and limited major sites to within the Lewisham and Catford town centres. This would protect the north Deptford sites from redevelopment and would retain them in business uses.

Several submissions were received who wanted a third option which restricted development across the borough, particularly reducing the number of new homes due to existing over development and the lack of supporting infrastructure.

6.1.2 Considering the strategic spatial options and alternatives

The appraisal of the strategic spatial options through the SA framework suggests that there are more socio-economic benefits associated with Option 1, while the environmental impacts (for both options) will need to be addressed through implementation and mitigation measures.

Option 1 is 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 under this option. Strong positive impacts for the economic and social objectives could result in improvements to the north of the borough. Option 1 sees a 24% increase over London Plan housing requirements. This enables the borough to meet housing demand and address housing affordability. Option 1 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.

Option 2, would deliver limited change in the overall physical form for the north of the borough, particularly with the status quo maintained for Strategic Industrial Land allocations in north Deptford. This will limit the opportunities to address deprivation in the Evelyn and New Cross wards(achieved through Option 1), which could radically improve the physical environment. The impacts relating to population growth and development will still place pressures on the environment, particularly on air quality, the use of open spaces and the consumption of natural resources, however the impact would be less than Option 1 due to the lower quantum of development proposed. Option 2 meets the strategic housing targets set out in the London Plan, and enhances retail and employment opportunities in some parts of the borough. However, the benefits of regeneration will not impact the most deprived wards of the borough and does not help to transform the employment base.

Option 3 was not considered as it would not meet national and regional policy requirements and would have limited impact on improving the physical, social and economic environment of the borough.

6.1.3 Topic based issues and options

The following provides a summary of the key issues and options for each of the topic areas used to prepare the Core Strategy. This considers the options presented and the rationale for the policy approach taken in the proposed submission version of the Core Strategy. The topic areas have been integrated to form part of the Lewisham spatial strategy detailed in section 6 of the Core Strategy and the cross cutting and thematic policies contained in section 7.

Employment

The main issue from this topic was to ensure that the Council provides an adequate supply of land for office, industrial and warehousing uses that meets the economic and functional needs of London as a whole, and ensures the vitality and viability of the local economy of the borough. These uses have to be balanced with actual demand for these uses, and also a supply of sites to meet housing provision targets.

The London Plan requires the borough to designate Strategic Industrial Locations that provide sites for public utilities, waste processing/transfer uses and other functions that contribute to London as a whole. Although this policy impacts negatively on most of the environmental objectives, such as waste, air quality, energy, open space, it contributes positively to the economic, employment, and waste transfer objectives and is essential for the continued industrial functioning of London. Similar comments apply to other issues such as Locally Employment Locations and other employment issues. Options to remove the protection applying to employment sites were rejected on economic grounds.

Education, health and community services

The two main issues for this topic were adequate provision and accessibility of health, education and community facilities. With added demands caused by predicted future increase in population and housing growth, there is a consequent pressure on the transport system and hence access to facilities. A proactive approach to provide facilities where there is an identified need and located within proximity of sustainable modes of transport showed significantly positive impacts covering the protection and enhancement of existing sites,

facilitating additional demand and ensuring that facilities are accessible by sustainable modes of transport such as walking and cycling.

Housing

The main issue from this topic was to ensure the Council allows and encourages the provision of additional homes to meet population growth and Government targets. This will need to be sought across a range of dwelling types, sizes and tenures, including affordable housing, to accommodate diverse housing needs.

The London Plan assigns a housing target for the Council and as a minimum this needs to be achieved. This policy impacts negatively on environmental objectives as additional housing and the associated increase in population impacts negatively on waste, water use, air quality and energy and climate change. However, there is generally a positive contribution to the range of social objectives, particularly those related to housing provision, social well-being and the need to reduce poverty and exclusion.

Options for affordable housing sought to maintain the current policy position of 35% or to increase provision to 50%. Due to overwhelming housing identified through the Strategic Housing Market Assessment the 50% target has been adopted.

There is a need to ensure that housing provision contributes to the objective of mixed and balanced communities. This can be achieved by ensuring housing provision caters for the range of housing needs (small to large households, family housing, specialist housing, gypsy and travellers) within suitable tenures (affordable housing and its split i.e. social or intermediate). Such issues have a positive social impact but are not necessarily the most economically sustainable, where land allocated to housing does not contribute to the supply of employment land.

Open space

The main issues for this topic were how to prevent and compensate for the loss of open space and how to provide additional open space in new development.

Lewisham falls within the classification of being an inner city borough. Open space in Lewisham, in public and private ownership, makes up almost 20% of the Borough's land area (689 ha) of which 415 ha is classified Public Open Space. A further 90ha of land is classified as green corridor (rail side land), almost 300 ha of open space is classified as Metropolitan Open Land (MOL) and just over 500 ha of land designated as Site of Nature Conservation Importance. With predicted population growth over the next 10 to 15 years, open space will become under increasing pressure for development.

As such an option was considered to set a target of 1.7ha per population to be retained throughout the borough to counteract the predicted population growth. This would ensure water quality, biodiversity, air quality, energy, landscapes and townscapes, decent housing, human health, education, community welfare and access to services wouldn't be prejudiced by further development. However, it was recognised that such a target could not be wholly met through the availability of providing additional open space. Therefore it was considered that in order to overcome this first issue through quantitative means, that a qualitative

approach could be adopted to improve the quality of existing open spaces, which could then provide greater recreational and biodiversity opportunities to new and existing residents. This preferred sustainable approach offers benefits to water quality, biodiversity, air quality, landscapes and townscapes, human health, education, reduced crime, community welfare and improved access to services.

Retail and town centres

The main issue in this topic was how to ensure that the boroughs district, neighbourhood and local centres were not under threat from major retail expansion happening within Lewisham and those from adjoining boroughs.

In light of these changing circumstances, the role and function of the boroughs remaining centres would adapt to enhance and strengthen its current position within the retail hierarchy. This proved to be the most sustainable option. The status quo option does not reflect the changing circumstances of the borough, therefore this approach was rejected. The option of attracting national brands was also rejected in principal due to this option threatening the local distinctiveness of the boroughs centres.

In order to maintain healthy vitality and vibrancy and to ensure that healthy growth is encouraged, the proposed policy is to adopt the use of designated primary and secondary areas within the district town centres. In terms of sustainability, this has positive effects for economic growth, employment, landscapes and townscapes. The use of specialist areas or quarters with a complimentary activity also scored highly in terms of sustainability and it is proposed that some centres would benefit greatly if this approach was adopted.

Another issue with regard to this topic is access and parking within the centres. The overarching LDF direction is to encourage people to use more public transport and promotes walking and cycling. However, Lewisham's retail viability is under threat from this role as more bulky non-food retail shopping will be encouraged. This will have problems of its own if large town centre shopping is to thrive and more parking facilities will need to be provided. On the other hand, the use of more public transport to district and smaller centres will be very sustainable in terms of employment, energy, air quality, landscapes and townscapes, human health, reduced poverty and social exclusion and a very positive impact to access to services.

High quality design and improvements to the existing environment is encouraged throughout all centres, as creating a well designed centre allows greater connectivity and offers safety and pleasant surroundings. This option together with boundary modifications to some centres will offer new redevelopment opportunities and create a more sustainable community.

The current status quo for out of centre remains as per the 2004 adopted UDP which is to apply the sequential test to out-of-centre development. This compliance with PPS6 ensures a blanket approach with other Local Authorities.

Sustainable environment

This topic covered eight separate issues with complementing and comparative options that were either based on the current UDP or improve on it.

Energy efficiency and installation of renewable technologies showed significantly positive impacts with only minor short term negative impacts due to the initial cost of installing new technologies. However, this will be alleviated by long term energy savings, particularly with a rise in fuel prices. The proposed policy requires implementation of energy efficiency and renewable and decentralised energy.

The options for flood risk included various types of measures with the basic presumption that some degree of flood risk assessment will be necessary in line with current requirements by the Environment Agency. The assessment showed positive impacts for the appropriate location of development via the sequential test and flood risk assessments, as this will reduce the amount of surface runoff. However, there are negative impacts on economic growth as the main flood risk areas are in the Regeneration and Growth Areas where most development is taking place. Retrofitting flood defence systems are less effective in cost and energy terms. A precautionary and proactive approach is preferred though the consequences on economic growth should also be taken into consideration.

As the borough is in a flood risk area, the protection and enhancement of the supply of water and improving the chemical and biological quality of the Blue Ribbon Network show significantly positive impacts. The initial energy required for providing additional water and sewage infrastructure will balance the need to recover water in times of drought. The proposed policy is a combination of the presented options.

Air quality, contaminated land, noise and light are issues that display positive impacts as the options were concerned with reducing pollutant levels. Air quality assessment can potentially have negative impacts in terms of economic development as the latter generates traffic which is a key contributor to air pollution. Suitable mitigation measures should ensure that traffic generating developments are located in areas of good public transport or supported by additional infrastructure to accommodate additional traffic.

Transport

The main issue from this topic was the need to maximise public transport use, capacity and provision to ensure positive environmental and social impacts and improve walking and cycling conditions.

Private vehicle use should be reduced through a range of measures to impact positively on air quality, health and energy objectives. Accessibility can be improved by allowing higher density development where there is good public transport, and promoting walking and cycling. Developers should also contribute to improving transport infrastructure, especially public transport, wherever deficiencies are identified.

Supporting public transport initiatives can make a positive contribution to sustainability objectives. This is achieved through improving accessibility and connectivity within the borough; improving transport choices to reduce the use of the private car; and contribute to

air quality and the reduction in the use of energy. The promotion and provision of public transport has overwhelming positive impacts. There is a need for appropriate travel and transport assessments, and planning obligations, to ensure traffic is appropriately managed and impacts positively on the borough's regeneration. This approach is supported by an effective traffic management strategy to reduce the impact and use of the private vehicle.

Improving conditions for walking and cycling has positive environmental and social impacts. There is a need to ensure that accessibility through walking and cycling is promoted and enhanced as part of the development process. The use of travel plans and travel assessments will further contribute to sustainable transport patterns.

Urban design and conservation

These issues are central to the physical environment of the borough by ensuring that the design of new development is appropriate to the local context and creates sustainable communities, and preserves valuable local elements of the built environment and landscape features.

Two options were reviewed relating to how density should be handled in the borough. One option proposed that sites should be developed according to context the second option proposed that this should be handled according to the current UDP policy of allowing higher densities in town centres only.

Overall the policies have wide benefits over a range of social economic and environmental factors. The main negative impacts are centred around energy conservation and flood risk arising from new development at a higher density. These can be mitigated by various environmental measures such as energy efficient buildings, and flood mitigation measures.

Waste

Waste management shows neutral to positive impacts for all issues with regards to the need for waste management facilities and setting criteria for recycling facilities in developments. The most stringent requirements generate an increased positive impact across the objectives. In terms of location of waste management facilities increasing proximity to facilities are more sustainable. Protection of existing sites show some negative impacts for economic growth and air quality, noise and vibration due to the nature of the waste that is handled and where they are located. A policy that sets criteria for waste management types e.g. allowing redevelopment of car breakers in residential areas to other employment uses or handling less polluting waste would mitigate these effects.

6.2 Relationship of the Core Strategy with other relevant plans and programmes

The first phase of the SA process (the 2005 Scoping Report) identified relevant international, national, regional and local polices, plans and programmes that needed to be taken into consideration when drafting the Core Strategy and the implications for the SA. This list of policies and programmes has been updated to reflect changes that have taken place since 2005. The updated list of relevant plans and programmes is contained in Appendix 13.

INITIAL STAGE Identify a range of strategic directions for Lewisham **PROCESS** PPG/PPS/ Circulars Global & Other LBL documents Stakeholders **Public** Consultation Sustainability Background Appraisal Research London Community Strategy Plan **REFINING OF SCENARIOS** Reasonable CONCEPTION OF SCENARIOS Realistic Relevant **CONCEPTION OF SCENARIOS** Growth through Growth through Limited growth and adoption major housing of a protective approach to Mixed use provision existing employment redevelopment designations PREFERRED OPTIONS **SELECTED MIXED USE SCENARIO 2007** REDEVELOPMENT **OPTION SCENARIOS** Borough-wide **Moderate regeneration** 2009 regeneration and growth and growth **CORE STRATEGY BOROUGH-WIDE PROPOSED** REGENERATION AND GROWTH **SUBMISSION VERSION**

Figure 6.1 Development of spatial options for the Core Strategy

7. Appraising the Core Strategy and the likely significant effects

This section of the report sets out a summary of the main issues resulting from the appraisal of the Core Strategy against the sustainability objectives. The SEA Directive and related UK Regulations require the SA to identify, describe and evaluate the likely significant effects on the environment of implementing the Core Strategy. The prediction of likely effects involves adopting an evidence based approach to:

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

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

- the criteria of significance in Annex II of the SEA Directive and
- the baseline characteristics and indicators outlined above and in Appendix 12 on whether or not a predicted effect will be environmentally significant.

Both predictions and evaluations may be qualitative or quantitative but must be based on evidence. In accordance with government guidance, this SA expresses the likely predicted and evaluated effects of the Core Strategy with a series of matrix tables using a scale approach as stated in the table below. The matrix tables follow a sequential appraisal methodology and are set out in appendices to this report.

Symbol	Interpretation against the SA objectives
++	Very positive outcome
+	A positive outcome
	Very negative outcome
-	Negative outcome
0	Neutral
?	Unclear
I	Depends upon implementation, i.e. how development takes
	account of a particular issue is subject to the implementation

The following section summarises the SA findings detailed in appendices 3 to 7.

The first section (section 7.1) summarises the appraisal results of the SA objectives carried out against each other to highlight any internal conflicts between these. It also proposes mitigation measures to reduce the potential conflicts. Full details are contained in Appendix 3.

The second section (section 7.2) summarises the appraisal results carried out for the Core Strategy objectives against the SA objectives to highlight any inconsistencies among the two

set of objectives. It highlights the key benefits and conflicts identified and proposes mitigation measures to reduce the conflicts. Full details are contained in Appendix 4.

The third section (section 7.3) summarises the appraisal results carried out for the Lewisham spatial strategy against the SA objectives highlighting the key benefits and conflicts against the sustainability objectives. Full details are contained in Appendix 5.

The fourth section (section 7.4) summarises the appraisal for each cross cutting and thematic policy put forward in the Core Strategy against the sustainability objectives. Full details are contained in Appendix 6.

The final section (section 7.5) summarises the appraisal for the six strategic site allocations against the sustainability objectives. Full details are contained in Appendix 7.

7.1 Appraising the internal consistency of the SA objectives

The matrix table in Appendix 3 analyses any inherent conflicts among the SA objectives themselves. The inherent nature of some objectives may lead to conflict (e.g. those that seek to promote growth may conflict with objectives that seek to protect and enhance biodiversity habitats). The analysis shows that the majority of the sustainability objectives are consistent with each other or have a neutral impact on each other. The table below lists conflicting sustainability objectives that were identified and includes mitigation measures that have been adopted in the core strategy where applicable, in order to mitigate this conflict.

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
Objective 2	There is a potential conflict with Objective 3 (to minimise the production of waste across all sectors and increase
To encourage and promote employment and new enterprises in Lewisham	reuse, waste recovery and recycling rates) as it is likely that if more employment is created then the businesses will generate more waste. However, the Core Strategy will promote policies that mitigate against this by encouraging recycling and the efficient use of resources.
	There is a potential conflict with Objectives 5 (to protect and enhance the borough's open spaces) and Objective 6 (to conserve and enhance the borough's natural habitats, biodiversity, flora and fauna and increase peoples access to nature in all areas of the borough) as more employment and businesses could be built on open space or currently vacant property or land that has established biodiversity.
	This will be mitigated by introducing policies to protect open space from being built on and requiring new development to introduce 'living roofs and walls' and landscaping that will encourage biodiversity.

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
	There is a potential conflict with Objective 7 (to improve air quality and reduce noise and vibration) as more businesses could increase air pollution either from the production process or from employees who may travel by motor vehicle or from delivery vehicles.
	This will be mitigated by policies that minimise the use of cars and encourage the use of public transport. There is a potential conflict with Objective 10 (to reduce
	and manage flood risk) as the major sites for encouraging employment are located in areas of high flood risk.
	This risk is mitigated due to the fact that the sites in Deptford are protected from flood risk by the Thames Barrier. In addition the Strategic Flood Risk Assessment and the Sequential Test specify measures to minimise any adverse impact.
	There is a potential conflict with Objective 12 (to conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough) if protecting historic buildings prevents their reuse for employment purposes. Business use may also not be compatible with conservation area status.
	The core strategy will mitigate this by introducing policies that seek to locate unsuitable business uses away from conservation areas.
	There is a potential conflict with Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) because the same land cannot be used for both homes and jobs.
	The core strategy will mitigate this by making land allocations that provide for both the identified employment and homes.
Objective 3 To minimise the production of waste and increase waste recovery and recycling	There is a potential conflict with Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as more homes will likely create more waste.
	However, policies will be introduced to mitigate against this by encouraging the provision of recycling facilities, composting and ensuring the borough safeguards existing waste facilities.

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
Objective 4 To use and manage the consumption of natural resources in a sustainable manner	There is a potential conflict with Objective 2 (to encourage and promote employment and new enterprises in Lewisham) and Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as larger amounts of resources such as water, gas and oil will be consumed.
	This will be mitigated by requiring sustainable construction techniques and the development and use of on-site renewable energy technology.
Objective 5 To protect and enhance the borough's open spaces	There is a potential conflict with Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as there may be pressure to build housing on open space. This will be mitigated by policies that protect open space from built development and identifying sufficient homes on brownfield sites.
Objective 6 To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna and increase people's access to nature in all areas of the borough	There is a potential conflict with Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as new housing may adversely affect biodiversity levels. Policies encouraging the incorporation of living roofs and walls and other forms of habitat provision in new developments will also be effective to enhance biodiversity levels in new developments.
Objective 9 To mitigate and adapt to the impact of climate change	There is a potential conflict with Objective 13 (to provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as new housing construction and the people that will occupy the homes will potentially lead to an increase in CO ₂ emissions by consuming more natural resources. This will be mitigated by requiring sustainable construction techniques and the use of on site renewable energy
Objective 10	technology. There is a potential conflict with Objective 13 (to provide
Objective 10 To minimise and mitigate flood risk	sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home) as some sites for new homes are located in a flood risk area.
	This will be mitigated by applying the sequential test to ensure all sites are suitably located or protected.

SA OBJECTIVE	SA OBJECTIVE CONFLICT AND MITIGATION MEASURES
Objective 13	There is a potential conflict with Objective 2 (employment),
	Objective 5 (open spaces), Objective 6 (biodiversity),
To provide sufficient	Objective 10 (flood risk) and Objective 9 (climate
housing of appropriate mix	change).
and tenure and the	
opportunity to live in a	The impacts and mitigation measures have been discussed
decent home	above.

7.2 Appraising the Core Strategy strategic objectives

This section summarises the appraisal carried out to test the strategic objectives contained in the Core Strategy against each SA objective. Appendix 4 contains the matrix table detailing the full appraisal. The purpose of this exercise is to assess the sustainability of the Core Strategy strategic objectives are sustainable and where appropriate to recommend removing any conflicts between these and the sustainability objectives.

The appraisal has found that most of the Core Strategy strategic objectives were either likely to have a very positive, positive or neutral impact when appraised against the sustainability appraisal objectives. The key findings from the appraisal are included below.

The strategic objectives of the Core Strategy form the link between the vision and the detailed spatial strategy. They expand the vision, reflect the drivers of change and focus on how the key issues facing the borough will be addressed over the plan period.

Amendments have been made to the strategic objectives for this proposed submission version of the Core Strategy in line with the recommendations made in public submissions received during the consultation phase of the Core *Strategy Options Report*, *February 2009* and the associated SA and a further review through this SA report.

The amendments are listed below and provide further clarification to the purpose of the strategic objectives in addressing the particular issue in order to improve the overall sustainability of the Core Strategy. All changes made relate to the strategic objectives contained in the *Core Strategy Options Report 2009*. New text is shown in italics.

Strategic objective 1: Physical and socio-economic benefits

The name of the objective was changed to better reflect the intent of the objective and highlight the physical and socio-economic benefits that would result from a strategy focusing on regeneration and redevelopment in the Lewisham, Catford, Deptford and New Cross areas as opposed to a borough-wide objective.

Physical and socio economic benefits Facilitate development

Regeneration and redevelopment opportunities Use redevelopment opportunities and the delivery of new homes, particularly in Lewisham, Catford, Deptford and New Cross, through the delivery of new homes and jobs, will be used to secure substantial physical and environmental improvements regeneration of the borough and socio-economic benefits

throughout the area to improve deprivation for the wider community. Benefits should be focused on areas where deprivation is concentrated, such as New Cross, Evelyn, Lewisham, Downham and Bellingham.

Key benefits identified through the SA process

- Redevelopment opportunities will be used to secure substantial physical regeneration in the north of the borough and the associated socio-economic benefits are likely to contribute to sustained economic growth (SA Objective 1).
- Larger scale mixed-use redevelopment will attract new enterprises to the borough and will provide the opportunity to promote and increase local employment and training opportunities (SA Objective 2).
- Creating additional local employment opportunities may in turn help to address
 deprivation and social exclusion issues and could contribute to the health and wellbeing of the community (SA Objectives 14, 15), contributing towards a sense of
 community identity and civic participation (SA Objective 18).

Key conflicts identified through the SA process

- Economic growth achieved through increased development will increase domestic and commercial waste (SA Objective 3).
- Increased development will lead to an increase in consumption of natural resources which may in turn have negative impacts on climate change (SA Objectives 4, 9).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 6).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8).
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 10).

Mitigation measures

- Development will take place in accordance with the waste hierarchy, thus minimising waste production and encouraging reuse and recycling (Core Strategy Policy 13).
- The use of sustainable design and construction techniques and building energy
 efficiency measures will reduce the use of natural resource consumption and can
 minimise the emission of greenhouse gases over the life of the building fabric
 (Core Strategy Policies 7, 8).
- The loss of open space will be resisted. The quality of existing open space will be improved and new developments will be required to provide on-site open spaces when appropriate (Core Strategy Policy 12).
- A comprehensive approach to controlling the level of car parking supply is an
 important tool in minimising the increase in car travel arising from development
 intensification. Additionally, committed and planned public transport and road

- infrastructure improvements should address capacity concerns and impact positively on air quality (Core Strategy Policies 7, 9, 14).
- The Council's SFRA and the subsequent Sequential Test (ST) will need to be used to determine the suitability of development on sites at risk of flooding (Core Strategy Policy 10).

Strategic objective 2: Housing provision and distribution

The initial objective contained in the Core Strategy Options Report 2009 was split into two in order to aid clarity and better align the Core Strategy with the Council's strategic objectives on housing. The new strategic objective 2 provides details on the quantum and location of future housing numbers across the borough in line with the Core Strategy.

Housing provision and distribution

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

Of these:

- (a) 2,600 will be distributed within the Lewisham Town Centre
- (b) 1,750 will be distributed within the Catford Town Centre
- (c) 10,625 will be distributed within Deptford and New Cross
- (d) 3,190 will be distributed across the remainder of the borough.

Key benefits identified through the SA process

Socio-economic

- An increase in the number of households is likely to contribute to sustained economic growth by increasing the opportunity for the provision of local employment and training. An element of affordable housing and a suitable housing mix would contribute to meeting specific housing needs (SA Objectives 1, 2, 13).
- Allocating specific housing numbers to identified areas will provide confidence to
 the community and developers and will stimulate regeneration in these areas. The
 associated new social and physical infrastructure is likely to improve the health and
 well-being of the community and may further encourage a sense of community
 identity in the long term (SA Objectives 14, 15, 18).

Key conflicts identified through the SA process

Environmental

- Increased housing development will increase domestic waste (SA Objective 3).
- With the increased housing growth, there is a likely potential in the increase in consumption of natural resources leading to additional CO₂ emissions impacting negatively on climate change (SA Objectives 4, 9).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 6).

- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8)
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 10).

Mitigation measures

- Development will need to occur in accordance with the waste hierarchy (Core Strategy Policy 13).
- The use of sustainable design and construction techniques and building energy
 efficiency measures will reduce the use of natural resource consumption and can
 minimise the emission of greenhouse gases over the life of the building fabric
 (Core Strategy Policies 7, 8).
- The loss of open space will be resisted. The quality of existing open space will be improved and new developments will be required to provide on-site open spaces when appropriate (Core Strategy Policy 12).
- A comprehensive approach to controlling the level of car parking supply is an
 important tool in minimising the increase in car travel arising from development
 intensification. Additionally, committed and planned public transport and road
 infrastructure improvements should address capacity concerns and impact
 positively on air quality (Core Strategy Policies 7, 9, 14).
- The Council's SFRA and the subsequent ST will need to be used to determine the suitability of development on sites at risk of flooding (Core Strategy Policy 10).

Strategic objective 3: Local housing need

This objective provides details on how local housing need will be met and the priorities for Council, which reflects the housing evidence base. Greater emphasis was placed on a suitable mix of housing types, specific housing to cater to the needs of an ageing population and those with special needs and maximising the use of existing housing by bringing vacant dwellings back into use.

Local housing need

Ensure a sufficient supply of high quality and sustainable housing for all Lewisham's residents, to meet and exceed London Plan targets. New homes should meet the needs of the community by providing:

1. a range of accommodation size (including family housing) and

2. an adequate supply of affordable housing

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

- (a) provision of affordable housing
- (b) a mix of dwelling sizes and types, including family housing
- (c) Lifetime homes, and specific accommodation to meet the needs of an ageing population and those with special housing needs
- (d) Bringing vacant dwellings back into use.

Key benefits identified through the SA process

Socio-economic

- An element of affordable housing and a suitable housing mix would contribute to meeting specific housing needs in the borough (SA Objectives 1, 2, 13).
- Ensuring all housing development is built to lifetime homes standard will enhance the well-being and quality of life of the population and meets the diverse needs of the community (SA Objectives 14, 15).

Environmental

 Bringing vacant dwellings back into use will help ensure sufficient housing is provided (SA Objective 13), maximises the use of existing infrastructure and minimises resource consumption (SA objectives 4, 9).

Key conflicts identified through the SA process

- Increased housing development will increase domestic waste (SA Objective 3).
- With the increased housing growth, there is a likely potential in the increase in consumption of natural resources leading to additional CO₂ emissions impacting negatively on climate change (SA Objectives 4, 9).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 6).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity further impacting air quality (SA Objectives 7, 8).
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 10).

Mitigation measures

- Development will need to occur in accordance with the waste hierarchy (Core Strategy Policy 12).
- The use of sustainable design and construction techniques and building energy
 efficiency measures will reduce the use of natural resource consumption and can
 minimise the emission of greenhouse gases over the life of the building fabric
 (Core Strategy Policies 7, 8).
- The loss of open space will be resisted. The quality of existing open space will be improved and new developments will be required to provide on-site open spaces when appropriate (Core Strategy Policy 12).
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in car travel arising from development intensification. Additionally, committed and planned public transport and road infrastructure improvements should address capacity concerns and impact positively on air quality (Core Strategy Policies 7, 9, 14).
- The Council's SFRA and ST will need to be used to determine the suitability of development on sites at risk of flooding (Core Strategy Policy 10).

Strategic objective 4: Economic activity and local businesses

The name of this objective was changed to better reflect the aim to boost economic activity in the borough. Further details on how the strategic objective would be achieved was added, including the protection of industrial land, the provision of green and creative industries and the aims for the future development of local centres. This reflects the employment and retail evidence base.

Increase local employment and training opportunities

Facilitate

investment and employment, resulting in a sustainable year-on-year net increase in the size of Lewisham's economy through:

- 1. the promotion of development and improved accessibility, meeting the demand of growth sectors and small and medium enterprises,
- the enhancement of District and Local Hubs as retail and service centres, encouraging increased use and employment opportunity, and
- 3. ensuring that local communities gain access to new employment and training opportunities.

Economic activity and local businesses

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

- (a) Protecting and developing a range of employment and training opportunities in the borough
- (b) Retaining business and industrial land that contributes to the industrial and commercial functioning of London as a whole, and/or which supports the functioning of the local economy including premises for the creative industries, green industries, business services and other employment growth sectors
- (c) Ensuring the future growth of the local economy by the mixed use redevelopment of identified industrial sites that require extensive physical investment and improvement
- (d) Developing Lewisham Town Centres to promote it to a Metropolitan Town Centre by 2026, and maintain the status of Catford as a Major Town Centre, with a focus on quality design and development and
- (e) Protecting and enhancing the District Shopping Centres, Local Shopping Centres,
 Parades and the range of farmers and street markets, as providers of sustainable local
 shopping facilities and services to continue to support basic community needs.

Key benefits identified through the SA process

Socio-economic

- Protecting existing employment land in strategic areas will attract new enterprises to the borough and will serve as a platform for future employment and economic growth (SA Objectives 1, 2).
- Creating additional local employment opportunities may in turn help to contribute to the health and well-being of the community and address deprivation and social exclusion issues (SA Objective 14, 15), and contribute towards a sense of community identity and welfare (SA Objective 18).

• The creation of more job opportunities may also lead to a reduction in crime and anti-social behaviour (SA Objective 17).

Key conflicts identified through the SA process

Environmental

- Increased economic activity and employment uses will increase commercial waste (SA Objective 3).
- With the increased housing growth, there is a likelihood of an increase in natural resources consumption leading to additional CO₂emissions impacting negatively on climate change (SA Objectives 4, 9).
- Existing open space is potentially at threat as land resources are limited and need to be used to meet other land use targets such as housing (SA Objective 5).
- Increased development has the potential for habitat loss impacting negatively on biodiversity (SA Objective 6).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8).
- Large scale development opportunities are primarily proposed to be located in Flood Zone 3a (High Probability). This will place land uses and population at risk of flooding (SA Objective 10).

Mitigation measures

- Development will need to occur in accordance with the waste hierarchy (Core Strategy Policy 13).
- The use of sustainable design and construction techniques and building energy
 efficiency measures will reduce the use of natural resource consumption and can
 minimise the emission of greenhouse gases over the life of the building fabric
 (Core Strategy Policies 7, 8).
- The loss of open space will be resisted. The quality of existing open space will be improved and new developments will be required to provide on-site open spaces when appropriate (Core Strategy Policy 12).
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in car travel arising from development intensification. Additionally, committed and planned public transport and road infrastructure improvements should address capacity concerns and impact positively on air quality(Core Strategy Policies 7, 9, 14).
- The Council's SFRA and ST will need to be used to determine the suitability of development on sites at risk of flooding (Core Strategy Policy 10).

Strategic objective 5: Climate change

The strategic objective on climate change was expanded to provide the specific measures the Council would pursue in order to reduce the borough's carbon emissions and mitigate against the effects of climate change, rather than a general objective on climate change.

Climate change

Take action that supports environmental protection and improvement, and reduces pollution and improves local air quality, including those measures necessary to create a low-carbon borough and reduce the adverse effects on climate change.

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

- (a) Promoting resource and water efficiency
- (b) Maximising generation and use of renewable energy and locally distributed energy, particularly for major development sites
- (c) Building to high standards of sustainable design and construction
- (d) Reducing waste generation
- (e) Supporting environmental protection and enhancement including establishing ecological networks
- (f) Minimising the environmental impacts of development including water, noise and air pollution.

Key benefits identified through the SA process

Socio-economic

- Positive contributions towards sustained economic growth by promoting a cleaner and greener environment and a low carbon local economy (SA Objective 1).
- A cleaner and greener environment impacts positively on other social objectives such as health and well-being and encouraging a sense of community and welfare (SA Objectives 14, 18).

Environmental

- It will contribute positively towards promoting the efficient use of natural resources through low carbon technologies thereby reducing the dependency on fossil fuels (SA Objective 4).
- A clean and green borough will impact positively on local air quality and further helps in improving the quality of exiting open spaces and biodiversity stock (SA Objectives 7, 5, 6).
- Promotes reductions in CO₂ emissions thereby positively contributing to mitigation of climate change and flood risk (SA Objectives 9, 10).
- Improved local air quality and reductions in CO₂ emissions will impact positively on the existing historic environment and townscape of the borough (SA Objectives 11, 12).

Key Conflicts identified through the SA process

• Building to high standards of sustainable design and construction and other climate change mitigation measures will incur higher build costs.

Mitigation measures

- The economic considerations of ensuring new developments are resource efficient will be accounted for by the application of minimum threshold (floor space of 1000sqm or 10 or more residential units) (Core Strategy Policy 8).
- Other mitigation measures that will be applied relevant to new dwellings will be implemented in a phased manner to allow time for industry to adapt and reduce costs and are in compliance with national and regional statutory requirements (Core Strategy Policy 8).

Strategic objective 6: Flood risk and water management

The name of the strategic objective on flood risk was changed in line with the terminology used by the Environment Agency. Further details were also provided on the specific measures the Council would adopt in order to reduce flood risk in the borough to reflect the evidence base.

Flood risk reduction and water management

The Council with its partners will ‡take action to protect the borough from the risk of flooding and reduce mitigate the effects of flooding from all sources, including the Thames, Ravensbourne and Quaggy rivers, and manage and improved water quality by:

- (a) Using the Environment Agency's sequential and exception tests to allocate land for Development
- (b) Requiring river restoration and appropriate flood defences as part of development proposals, where appropriate
- (c) Ensuring appropriate local flood defences are maintained and provided for
- (d) Requiring sustainable urban drainage systems in new development, wherever feasible.

Key benefits identified through the SA process

- Flood risk issues identified in Lewisham's SFRA will be addressed. Most of the
 regeneration and growth areas are located in the north of the borough, and large
 development sites are located within Flood Zone 3a which has a high probability of
 flood risk, therefore minimising and mitigating against flood risk is crucial (SA
 Objective 10).
- Addressing flood issues is likely to contribute to the health and well-being of the community (SA Objective 14).

The objective itself is promoting mitigation and adaptive measures to reduce the risk of flooding from all new developments and as such did not show any conflicts.

Strategic objective 7: Open spaces and environmental assets

Further details were provided on the specific measures the Council would adopt to protect open spaces and environmental assets in the borough. These include providing details of the location of future green infrastructure in the borough. The need to increase the provision of open space was added.

Open spaces and environmental assets

Protect and capitalise on the important environmental features of Lewisham such as developing the Green Grid, biodiversity and sites of nature conservation and open spaces, including the Green Chain walk and the Waterlink Way.

The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by:

- (a) Protecting all public open space including Metropolitan Open Land
- (b) Protecting Sites of Nature Conservation Importance and supporting and promoting local biodiversity
- (c) Requiring green roofs and walls where appropriate
- (d) Implementing the Street Tree Programme
- (e) Improving the quality of, and safeguarding access to, all public open space
- (f)Providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and the Thames Footpath
- (g) Seeking additional open space where appropriate.

Key benefits identified through the SA process

Socio-economic

- The protection and enhancement of environmental features will contribute to sustained economic growth and will promote spaces for leisure activities (SA Objectives 1, 19).
- Providing waterways and green links as a part of this objective will contribute to the health of the community, which could further lead to a sense of community identity and welfare (SA Objective 14, 18).
- Improving the existing stock of open spaces could lead to a reduction in crime levels by promoting more activity throughout the borough (SA Objective 17).

Environment

- Positive impacts on reducing and mitigating flooding and associated climate change impacts (SA Objectives 9, 10).
- The townscape, landscape and historic environment will be enhanced (SA Objectives 1, 12).

Key conflicts identified through the SA process

 Existing open space is potentially under threat due to the limited available land supply needed to meet other land use targets, for example on housing or employment (SA Objective 2, 13). Improving the quality of existing open spaces may have a detrimental impact on existing biodiversity levels if habitat is lost as a result of improvements (SA Objectives 5, 6).

Mitigation measures

 Qualitative improvements to public open space, resisting its loss and on-site provision need to undertaken where appropriate. The potential loss of biodiversity resulting from such improvements will be accounted for (Core Strategy Policy 12).

Strategic objective 8: Waste management

The strategic objective was expanded to include details of safeguarded waste facilities that would contribute to the borough addressing its apportioned waste and including composting as a contributing factor to reduce landfill.

Waste management

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

Key benefits identified through the SA process

Socio-economic

 Managing and providing a sufficient number of waste facilities positively impacts on sustained economic growth and existing and future residents (SA Objectives 1, 14).

Environmental

- Promoting the waste hierarchy of reduce, reuse, recycle, compost, recover and disposal would contribute to the efficient use of natural resources (SA Objective 3).
- Effective waste management could reduce the emission of greenhouse gases in particular methane - potentially helping to mitigate against climate change (SA Objective 9).
- Mitigating climate change can reduce flood risk (SA Objective 10).
- The quantum of development opportunities proposed in Deptford and New Cross provides the possibility of a waste to energy scheme through the South East London Combined Heat and Power plant (SELCHP) and/or the provision of decentralised energy networks (SA Objectives 3, 4, 7, 9, 10).

Key Conflicts identified through the SA process

 Waste management will need to compete with other land uses such as housing and employment that are vital to the economy (SA Objectives 1, 2, 13).

Mitigation measures

 The Core Strategy will implement the waste hierarchy and will ensure that a sufficient number of waste facility sites are safeguarded from competing land uses (Core Strategy Policy 13)

Strategic objective 9: Transport and accessibility

Additions were made to the strategic objective to emphasise what the Council will do to ensure transport and accessibility is improved, freight is mentioned and key transport infrastructure improvements were updated.

Transport and accessibility

Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people's access needs while reducing the need to travel and reliance on the private car, and which. This will:

- a. promotes choice and better health
- b. facilitates sustainable growth in the key localities for regeneration and growth (Lewisham, Catford, Deptford, New Cross)
- c. improves integration, accessibility and connectivity within the borough and the London sub-region, and that specifically:

The Council will ensure that transport and accessibility within the borough:

- a. provides for a system of walking and cycling routes and strong links to the green infrastructure network town centres and public open space, including the Waterlink Way
- b. improves accessibility in the Evelyn, Whitefoot, Bellingham and Downham wards
- c. facilitates the movement of freight while minimising the adverse impacts of traffic, noise and emissions
- d. delivers key infrastructure projects including the both phases of the East London Line Extension, the Thameslink programme, the lower 'h' road at Lewisham, removal of the Kender gyratory system and safeguarding provision for the Surrey Canal station as part of the London Overground network.

Key benefits identified through the SA process

Socio-economic

- Ensuring and promoting a safe, convenient and sustainable transport system will contribute to the local economy by providing better transport links and improving accessibility (SA Objectives 1, 2, 19).
- Improving accessibility with a focus in deprived wards such as Evelyn and New Cross will address deprivation issues (SA Objectives 14, 15, 19).
- Improved accessibility will impact positively on people with limited mobility (SA Objective 13, 19).
- Improved sustainable transport infrastructure will encourage travel by walking, cycling or public transport and will positively impact on the health and well-being of the population and will reduce health inequalities. (SA Objective 14).

Environment

 Reducing the need to travel and promoting sustainable transport modes such as walking and cycling is likely to address existing local air quality and noise issues and will help enhancing the quality of open spaces and biodiversity features (SA Objectives 5, 6).

- It is also likely to contribute towards the efficient use of natural resources by reducing the dependency on fossil fuels, which in turn could help in reducing the negative impacts on climate change and flooding by reducing CO₂ emissions (SA Objectives 4, 9, 10).
- Improved local air quality and promoting green links is likely to protect and enhance the existing quality of historic environment, townscape and other archaeological aspects of the borough (SA Objectives 11, 12).

The objective itself is promoting mitigation measures to reduce the negative impact of transport from all new developments and as such did not show any conflicts.

Strategic objective 10: Protect and enhance Lewisham's character

The strategic objective to protect Lewisham's character was changed to provide details of how the borough's local character would be preserved and enhanced through the implementation of sound urban design principles. This now includes safety previously a separate strategic objective.

Protect and enhance Lewisham's character

Protect Lewisham's urban environment and its local character and distinctiveness, through sensitive and beneficial design, in particular those areas requiring managed change such as the borough's 26 conservation areas and listed buildings, yet at the same time creating and improving the key regeneration areas of Lewisham, Catford, Deptford and New Cross.

Lewisham's distinctive local character will be protected through sensitive and beneficial design, in particular those areas requiring managed change and protection such as the borough's conservation areas and listened buildings, yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean:

- a. ensuring that new development achieves high standards of urban design and residential quality and contributes to a sense of place and local distinctiveness
- b. ensuring that new development and alteration to existing buildings are sensitive,.

 appropriate to their context, and make a positive contribution to the urban environment
- c. preserving or enhancing the borough's conservation areas, listed buildings ad the other identified elements of the historic environment including archaeological remains.

Key benefits identified through the SA process

Socio-economic

A balanced approach to protecting the character of conservation areas and areas
of managed change while enhancing the character of areas set for regeneration
will contribute positively to the overall character of the borough by encouraging a
sense of community identity, social cohesion and civic participation (SA Objective
18).

Environment

 Protecting and enhancing the character of the borough is likely to enhance the townscape and other existing features (SA Objectives 11, 12). Additionally, it will have benefits for local air quality, open spaces and biodiversity features (SA Objective 5, 6).

The objective itself is promoting measures to promote and enhance the existing landscape and townscape characters from all new developments and as such didn't show any conflicts.

Strategic objective 11: Community well-being

A new strategic objective names 'Community well-being' was added. This merged the previous objectives on 'Safety' and 'Social Infrastructure' and provided details on the specific locations where deprivation and health inequalities would be addressed and stressed the link between health and well-being, and the provision of physical, social and green infrastructure.

Core Strategy Objective 9: Safety

Create safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies.

Core Strategy Objective 10: Social infrastructure

Promote the provision of services and facilities such as schools, health, community, sports and recreation facilities, that are accessible to all of Lewisham's diverse residents, to foster independent community living.

Community well-being

The Council with its partners will provide and support measures and initiatives that promote social inclusion and strengthen the quality of life and well-being for new and existing residents of the borough by:

- a. addressing deprivation and health inequalities particularly within the wards of Evelyn, New Cross, Lewisham Central, Whitefoot, Bellingham and Downham
- b. creating safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies
- c. providing physical, social and green infrastructure, including high quality health and education facilities, that are accessible and suitable to all of Lewisham's residents, to foster independent community living.

Key benefits identified through the SA process

Socio-Economic

- Addressing deprivation and health inequalities and providing the required social infrastructure facilities such as health, schools, sports and recreational facilities etc, to meet existing and future needs will help in contributing towards sustained economic growth (SA Objectives 1, 2).
- Increasing facilities in various services such as health, education, sports and recreation etc will lead to an increase in local employment opportunities contributing further to the local economy (SA Objective 2).
- The incorporation of sound urban design principles and the provision of social infrastructure (transport, leisure and health facilities) is likely to promote a sense of

- community identity and welfare. This could further contribute to the health and well-being of the community (SA Objectives 18, 19).
- Promoting facilities for sports and recreation and education, is likely to raise the
 education and sports standards in the borough. Additionally, engaging people in
 activities on education and sports could lead to reduction in crime levels and social
 exclusion (SA Objectives 15, 17, 18).

Key conflicts identified through the SA process

Socio-economic

 Social infrastructure facilities will need to compete with other land uses such as housing and employment (SA Objectives 2, 13).

Environment

- Development of such facilities will increase the amount of waste generated and is likely to place pressure on the existing waste management facilities (SA Objective 3).
- An increase in the number of facilities is likely to place pressure on existing stock of natural resources as it will be consumed at much faster rate and could in turn increase the emissions of CO₂ (SA Objectives 4, 9).
- Increased development, which is primarily proposed to be located in the Air Quality Management Areas, will increase vehicular activity, further impacting air quality (SA Objectives 7, 8).
- Large scale development opportunities are primarily proposed to be located in the flood Zone 3a which has a high probability of flood risk. This will place land uses and population at the risk of flooding (SA Objective 10).

Mitigation measures

- Development will need to occur in accordance with the waste hierarchy (Core Strategy Policy 13).
- The use of sustainable design and construction techniques and building energy
 efficiency measures will reduce the use of natural resource consumption and can
 minimise the emission of greenhouse gases over the life of the building fabric
 (Core Strategy Policies 7, 8).
- The loss of open space will be resisted. The quality of existing open space will be improved and new developments will be required to provide on-site open spaces when appropriate (Core Strategy Policy 12).
- A comprehensive approach to controlling the level of parking supply is an important tool in minimising the increase in car travel arising from development intensification. Additionally, committed and planned public transport and road infrastructure improvements should address capacity concerns and impact positively on air quality (Core Strategy Policies 7, 9, 14).
- The Council's SFRA and ST will need to be used to determine the suitability of development on sites at risk of flooding (Core Strategy Policy 10).

7.3 Appraising the Lewisham's spatial strategy

The Core Strategy details the spatial strategy for the borough that will guide development and accommodate growth and regeneration within the borough to 2026. The choice of this spatial strategy from a range of alternative options has emerged over the course of the phased development of the Core Strategy. Details on the development of options and alternatives is contained in section 6 of this SA report. The 2007 Preferred Options SA report provides details of alternative options and the reasons why they were not pursued. This is further supported by the appraisal of alternative spatial options as part of the SA for the Core Strategy Options Report in February 2009.

This SA report titled 'Sustainability appraisal and strategic environmental assessment – Core Strategy Options Report, February 2009' held that the proposed spatial strategy was more sustainable than an alternative approach on the basis that it offered the potential for greater socio-economic benefits and that any environmental impacts could be mitigated against with effective policy implementation.

The Lewisham spatial strategy is detailed in five separate policies. These are listed below:

- Spatial Policy 1 Lewisham Spatial Strategy
 This is the overarching spatial policy and provides the broad conditions and parameters for the distribution of development and how this will take place.
- Spatial Policy 2 Regeneration and Growth Areas
 This policy provides details of the key regeneration and development opportunities within the localities of Lewisham, Catford, Deptford, Deptford Creekside and New Cross/New Cross Gate.
- Spatial Policy 3 District Hubs
 This policy identifies and details strategies designed to protect the borough's district town centres and their immediate surrounding residential neighbourhoods.
- Spatial Policy 4 Local Hubs
 This policy identifies the borough's local hubs and lists how these hubs can be managed to enhance the identity, distinctiveness and economic potential of each local hub.
- Spatial Policy 5 Areas of Stability and Managed Change
 This policy identifies areas that are largely suburban and residential in nature and seeks to maintain the existing character of these areas by protecting them from incompatible land uses.

The following section summarises the appraisal for each of these spatial policies and highlights:

- key sustainability benefits arising from each policy
- key sustainability conflicts
- suitable mitigation measures to address the conflicts.

The full mitigation measures can be found in section 8 and the appraisal of the spatial policies can be found in Appendix 5.

7.3.1 Spatial Policy 1 Lewisham Spatial Strategy

Key benefits identified through the SA process

Socio-economic

- Likely to promote sustained economic growth by attracting further investment. Employment will be focussed on economic growth sectors suitable to the borough as identified in the Employment Land Study. Proposals for mixed use employment development and the associated provision of job opportunities, housing and other infrastructure facilities will improve economic conditions particularly in Deptford and New Cross. The retention throughout the borough of existing locally significant employment locations will encourage sustainable economic growth as will retail growth in designated town centres (SA Objective 1).
- Likely to generate an increase in job and training opportunities as employment is focussed in growth areas such as business support. There is the potential to contribute up to 100,000 sq.m. of business employment space equal to approximately 6,000 additional jobs in this sector, as identified in the Employment Land Study. The provision of new job and training opportunities will open up new opportunities for the local population, particularly important in areas of high deprivation. Retail growth will also contribute positively to employment (SA Objective 2).
- The use of previously developed land for housing and employment uses (particularly the proposed MEL) further protects the borough's open space and its 26 conservation areas (SA Objective 5, 6, 11, 12).
- New development is likely to bring positive changes in the existing townscape and landscape of the borough. New buildings and surrounding spaces will raise the overall standard of design, environmental quality and improve permeability and accessibility in the whole borough but particularly in Evelyn and New Cross wards. Development will contribute to solving the problems of physical severance caused by railway viaducts and increase connectivity of these sites with the rest of the borough (SA Objective 11).
- Lewisham's historic environment is preserved or enhanced (SA Objective 12).
- Substantial housing provision is made over the plan period. If all sites are implemented this could exceed the London Plan target by 25%. There is an identified need in the Strategic Housing Market Assessment for more homes which would be substantially met (SA Objective 13).
- Provision for more homes, jobs and social infrastructure facilities in areas of high deprivation is made. These aspects contribute towards good health and should make a positive impact on the well-being of residents. The protection of open spaces and improving leisure facilities will also contribute positively to the health of residents (SA Objective 13, 14, 15, 16, 18, 19).
- The place making agenda will require all new developments to take account of safer by design principles. It is anticipated that new homes and a greatly

improved physical environment will contribute to a reduction in crime. The provision of more jobs, housing and other economic opportunities in areas that are highly deprived such as the New Cross or Evelyn wards is also expected to make a positive contribution to achieving this objective. New development will contribute towards creating a sense of place, and local community identity (SA Objective 17, 18).

 A key objective of this policy is that the physical, green and social infrastructure are provided alongside new homes (SA Objective 18, 19).

Environmental

- Development opportunities provide scope for the implementation of decentralised energy systems within the borough (SA Objective 4).
- Development is resisted on open space particularly Metropolitan Open Land and Sites of Nature Conservation and natural habitats and biodiversity conserved or enhanced (SA Objectives 5, 6).
- Redevelopment of industrial land provides the opportunity to increase areas of open space and improve biodiversity through living roofs and walls (SA Objectives 5, 6).
- Wider regeneration opportunities through mixed use employment development will provide the potential to improve PTALs in the Evelyn and New Cross wards. Accessibility will be improved through better pedestrian and cycle connections reducing severance in Evelyn and New Cross wards (SA Objective 8).
- Reduced car parking in residential development can be promoted in areas with higher PTALs (SA Objective 8).
- Redevelopment opportunities allow opportunities to implement river naturalisation (SA Objective 9).

Key conflicts identified through the SA process

Socio-economic

- Land allocated to housing does not add to the supply of employment land, unless part of a mixed use development, although additional population can increase the local employment base and contribute towards economic growth (SA Objectives 1, 2).
- There will be a reduction in the number of sites and the amount of choice available to industrial/business uses with less demanding environmental requirements. This will lead to a loss of existing jobs and industries (SA Objectives 1, 2).

Environmental

- New homes and businesses will inevitably create more on-going waste, as well as waste arising from the construction phase (SA Objectives 3, 4, 7).
- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 7).

- Increased development will reduce the per capita amount of open space, and has the potential for habitat loss impacting negatively on biodiversity (SA Objectives 5, 6).
- Biodiversity levels may suffer due to population growth and development pressures (SA Objective 6).
- Any increase in population and associated development will place increased pressure on public transport facilities, and in the absence of control and management of the supply of on-street parking will lead to an increase in onstreet car parking demand (SA Objectives 7, 8, 9).
- Increase in population and other regeneration activities will put additional
 pressures on existing air and noise quality in the borough. Large development
 sites are located within an AQMA. Construction activities may create some
 nuisance to neighbours (SA Objectives 7, 9).
- Obvious conflicts relate to flooding within the regeneration and growth corridor specifically within the town centres of Catford and Lewisham, and for key development areas within Deptford and New Cross (SA Objectives 9, 10).
- There is a need to ensure housing provision meets housing need and the requirements of the borough's population (SA Objective 13).
- Local air quality will have a direct impact on the health of the population (SA Objectives 7, 14).
- Employment and training opportunities need to be provided to the local population (SA Objective 16).
- Increased development has the potential to increase crime and its perception (SA Objective 17, 18).

Mitigation measures

- Regeneration will result in incompatible uses being relocated to appropriate areas and will improve the quality of existing adjacent residential areas (Core Strategy Policies 3, 4, 5).
- All new development will need to be built to relevant Code for Sustainable Homes or BREEAM standards (Core Strategy Policy 8).
- Flood risk will be addressed through the SFRA recommendations and the application of the sequential and exceptions test (Core Strategy 10).
- Proposals to naturalise the rivers in the borough will be achieved (Core Strategy policies, 10, 11).
- The local waste strategy of reduce, reuse, compost and recycle will have a positive impact on waste creation and will also improve recycling rates. The strategy will safeguard sufficient sites to process the borough's waste and deal with the proportion outlined in the London Plan (323,000 tonnes by 2020). It will also make sure that sustainable construction techniques are in place. The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP (Core Strategy Policy 12).
- Existing open space will be safeguarded and its quality improved as well as seeking an increase in the amount of open space through on-site provision at large redevelopment sites. The promotion of the inclusion of living roofs and

walls and landscaping in new development will enhance biodiversity (Core Strategy Policy 12).

7.3.2 Spatial Policy 2 Regeneration and Growth Areas

Key benefits identified through the SA process

Socio-economic

- There is the potential to attract further investment to the borough and increase
 the contribution the Mixed Use Employment Locations (MELs) can make to
 sustained economic growth (SA Objective 1).
- The retention of existing locally significant employment locations will contribute towards sustainable economic growth (SA Objective 1).
- The release of Strategic Industrial Land (SIL) will focus employment opportunities towards growth sectors that are suitable to the borough as identified in the Employment Land Study (SA Objectives 1, 2).
- The retention of an element of SIL will contribute to the continued economic functioning of London and the safeguarding of the borough's waste sites (Objective 1).
- Major retail development and growth will be focussed in Lewisham and other major and district town centres with high accessibility (SA Objectives 1, 2, 8).
- New development is likely to bring positive changes in the existing townscape and landscape of the borough. New buildings and surrounding spaces will raise the overall standard of design, environmental quality and improve permeability and accessibility in the whole borough but particularly in Evelyn and New Cross wards. Development will contribute to solving the problems of physical severance caused by railway viaducts and increase connectivity of these sites with the rest of the borough (SA Objective 11).
- Substantial housing provision will be made over the plan period. If all sites are
 implemented this could exceed the London Plan target by 25%. There is an
 identified need in the Strategic Housing Market Assessment for more homes
 which would be substantially met (SA Objective 13).
- Provision for more homes, jobs and social infrastructure facilities in areas of high deprivation is made. These aspects contribute towards good health and should make a positive impact on the well-being of residents. The protection of open spaces and improving leisure facilities will also contribute positively to the health of residents (SA Objectives 13, 14, 15, 18, 19).
- The provision of more jobs, homes and improving the quality and providing
 infrastructure will contribute positively to addressing deprivation issues and help
 increase social cohesion in the borough. This policy particularly targets the
 Evelyn and New Cross wards which have the highest levels of deprivation in
 the borough (SA Objectives 15, 18, 19).
- The place making agenda that is central to this policy will require all new
 development to take account of safer by design principles. It is anticipated that
 new homes and a greatly improved physical environment will contribute to a
 reduction in crime. The provision of more jobs, housing and other economic
 opportunities in areas that are highly deprived such as the New Cross or Evelyn

- wards is also expected to make a positive contribution to achieving this objective. New development will contribute towards creating a sense of place, and local community identity (SA Objectives 17, 18).
- Programmes such as the Building Schools for the Future will contribute towards
 this goal by improving or rebuilding all secondary schools in the borough.
 Promoting training opportunities with mixed use employment sites will also
 contribute to this objective (SA Objective 2, 15, 16).

Environmental

- The protection of key waste sites that fall within the regeneration and growth areas will ensure that the borough can manage its apportioned waste as detailed in the London Plan (SA Objective 3).
- Redevelopment of industrial land provides the opportunity to increase areas of open space and improve biodiversity through living roofs and walls (SA Objectives 5, 6).
- Wider regeneration opportunities through mixed use employment development will provide the potential to improve PTALs in the Evelyn and New Cross wards. Accessibility will be improved through better pedestrian and cycle connections reducing severance in Evelyn and New Cross wards. Reduced car parking in residential development can be promoted in areas with higher PTALs (SA Objective 8).
- Site redevelopment allows opportunities to implement river naturalisation (SA Objective 10).

Key conflicts identified through the SA process

Socio-economic

 There will be a reduction in the number of sites and the amount of choice available to industrial/business uses with less demanding environmental requirements. This will lead to a loss of existing jobs and industries (SA Objectives 1, 2).

Environmental

- New homes and businesses will inevitably create more on-going waste, as well as waste arising from the construction phase (SA Objectives 3, 4, 7).
- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 9).
- Biodiversity levels may suffer due to population growth and development pressures (SA Objective 6).
- Increase in population and other regeneration activities will put additional
 pressures on existing air and noise quality in the borough. Large development
 sites are located within an AQMA. Construction activities may create some
 nuisance to neighbours (SA Objectives 7, 9).

Mitigation measures

- Regeneration will result in incompatible uses being relocated to appropriate areas and will improve the quality of existing ,adjacent residential areas (Core Strategy Policies 3, 4, 5).
- Proposals to naturalise the rivers in the borough will be achieved. The
 promotion of the inclusion of 'living roofs and walls' and landscaping in new
 development will enhance biodiversity (Core Strategy Policies 7, 8, 10, 11, 12).
- All new developments will need to be built to relevant Code for Sustainable Homes or BREEAM standards (Core Strategy Policy 8).
- The local waste strategy of reduce, reuse and recycle will have a positive impact on waste creation and will also improve recycling rates. The strategy will safeguard sufficient sites to process the borough's waste and deal with the proportion outlined in the London Plan (323,000 tonnes by 2020). It will also make sure that sustainable construction techniques are in place. The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP (Core Strategy Policy 13).

7.3.3 Spatial Policy 3 District Hubs

Key benefits identified through the SA process

Socio-economic

- The borough's District Hubs will contribute to the protection of economic growth and employment as they protect core shopping areas for retail and employment purposes. They are also important contributors to the evening economy (SA Objective 1, 2).
- The retention of existing locally significant employment locations will contribute towards sustainable economic growth (SA Objective 1).
- The policy seeks to promote the growth of district town centres with the aim of retaining retail expenditure within the borough. Local Employment Locations will also be retained and incompatible land uses will be resisted. This will serve to encourage and promote employment and new enterprises in Lewisham (SA Objective 2).
- The promotion of suitable mixed use residential developments in District Hubs will contribute to the provision of an appropriate mix and tenure of housing that will contribute to the character of existing areas (SA Objectives 11, 13, 18).

Environmental

- The promotion of the growth of District Hubs and associated improvements to street connectivity and sustainable transport infrastructure in the area will both reduce the need to travel longer distances to access services and reduce car travel. This will serve to improve both local air quality levels and reduce greenhouse gas emissions (SA Objectives 7, 8, 9).
- The promotion of district town centre growth and associated improvements to the public realm and street connectivity will encourage the use of the public realm both in the centres and surrounding areas. This will positively impact on

- the general safety and the well-being of the population and will promote social inclusion (SA Objectives 11, 14, 15).
- The historic environment will be preserved or enhanced (SA Objective 12).

Key conflicts identified through the SA process

Environmental

- New homes and businesses will inevitably create more on-going waste, as well as waste arising from the construction phase (SA Objectives 3, 4, 7).
- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 9).
- Increase in population and other regeneration activities will put additional pressures on existing air and noise quality in the borough. Large development sites are located within an AQMA. Construction activities may create some nuisance to neighbours (SA Objectives 7, 9).

Mitigation measures

- Regeneration will result in incompatible uses being relocated to appropriate areas and will improve the quality of existing ,adjacent residential areas (Core Strategy Policies 4, 5).
- All new developments will need to be built to relevant Code for Sustainable Homes or BREEAM standards (Core Strategy Policy 8).

7.3.4 Spatial Policy 4 Local Hubs

Key benefits identified through the SA process

Socio-economic

- The borough's Local Hubs will contribute to the protection of economic growth and employment as they protect local parades, local employment areas and out-of-centre retail parks contributing towards local employment and the provision of goods and services (SA Objective 1, 2).
- The promotion of Local Hubs and associated improvements to the public realm and street connectivity will encourage the use of the public realm both in the centres and surrounding areas. This will positively impact on the general safety and the well-being of the population and will promote social inclusion (SA Objectives 11, 13, 18).

Environmental

 The promotion of the Local Hubs and associated improvements to street connectivity and sustainable transport infrastructure in the area will both reduce the need to travel longer distances to access services and reduce car travel. This will serve to improve both local air quality levels and reduce greenhouse gas emissions (SA Objectives 7, 8, 9).

Key conflicts identified through the SA process

Socio-economic

 There will be a reduction in the number of sites and the amount of choice available to industrial/business uses with less demanding environmental requirements. This will lead to a loss of existing jobs and industries (SA Objectives 1, 2).

Environmental

- New homes and businesses will inevitably create more on-going waste, as well as waste arising from the construction phase (SA Objectives 3, 4, 7).
- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 9).
- Increase in population and other regeneration activities will put additional
 pressures on existing air and noise quality in the borough. Large development
 sites are located within an AQMA. Construction activities may create some
 nuisance to neighbours (SA Objectives 7, 9).

Mitigation measures

- Regeneration will result in incompatible uses being relocated to appropriate areas and will improve the quality of existing ,adjacent residential areas (Core Strategy Policies 3, 4, 5).
- All new developments will need to be built to relevant Code for Sustainable Homes or BREEAM standards (Core Strategy Policy 8).
- The local waste strategy of reduce, reuse, compost and recycle will have a
 positive impact on waste creation and will also improve recycling rates (Core
 Strategy Policy 13).

7.3.5 Spatial Policy 5 Areas of Stability and Managed Change

Key benefits identified through the SA process

Socio-economic

- Economic growth will be sustained in these areas through the retention of a strategic industrial location, other locally important employment areas and other small employment areas that are scattered throughout the borough (SA Objective 1).
- Local employment in the small premises that are in these areas will be
 protected and retained if they have the potential to continue to contribute to
 economic vitality in the area (SA Objective 2).
- Due to the already established nature of these areas and the small scale of proposed future developments, the highly valued existing streetscape and townscape will be preserved and enhanced. As the limited redevelopment opportunities in these areas are restricted around stations, local character will be preserved by ensuring that proposed developments incorporate sound urban design principles that respect the existing urban fabric (SA Objective 11).

- The limited development potential in these areas will result in continuing strong levels of protection for conservation areas and the historical environment and other archaeological aspects of the borough (SA Objective12).
- These areas will deliver around 10% of the borough's total housing need in a
 manner that protects local character and employment centres. The Core
 Strategy will ensure that a sufficient mix and tenure of new housing is provided
 in these areas, particularly ensuring that an adequate supply of family housing
 is retained, by restricting inappropriate conversion applications (SA Objective
 13).
- By controlling the level and scale of new development in these established areas, the Core Strategy will continue to promote a sense of community identity, social cohesion and civic participation in local affairs among residents of these areas (SA Objective 18).

Environmental

- There will be strong levels of protection for open space and environmental assets in these areas from inappropriate developments (SA Objectives 5, 6).
- The historic environment will be preserved or enhanced (SA Objective 12).

Key conflicts identified through the SA process

Environmental

- An increase in population leads to an increase in the consumption of natural resources, including water (SA Objectives 4, 8).
- The limited development potential in these areas means that opportunities for new employment and shopping areas are restricted. This would limit the possibility to reduce car travel and travel demand generally and would continue to result in automobile related emissions and negative impacts on air quality as residents would need to continue to travel to larger centres to access services.

Mitigation measures

- All new developments will need to be built to relevant Code for Sustainable Homes or BREEAM standards (Core Strategy Policy 8).
- Sustainable transport infrastructure will be upgraded to improve connectivity
 and quality. Particular emphasis will be placed on improving high traffic routes
 such as those to schools, town centres and rail stations to reduce the need for
 car travel (Core Strategy Policies 14, 19).

7.4 Appraising the cross cutting and thematic policies

This section summarises the appraisal findings carried out for each Core Strategy policy grouped under the following themes (as contained in the Core Strategy):

- providing hew homes
- growing the local economy
- climate change and environmental management
- building a sustainable community.

The completed appraisal can be found in Appendix 6 and the alternatives considered as part of the Core Strategy preparation are included as Appendix 11.

7.4.1 Providing new homes

The Core Strategy policies appraised under this theme are as follows:

- CS Policy 1 Housing provision, mix and affordability
- CS Policy 2 Gypsies and travellers.

Key benefits identified through the SA process

Socio-economic

- The assessment suggested that each policy is likely to contribute towards
 meeting the housing requirements identified in the Lewisham Strategic Housing
 Market Assessment (SA Objective 13) and implement the objectives of the
 Council's Housing Strategy.
- An element of affordable housing, a suitable housing mix and type, and
 provision of accessible housing, will address the wide range of housing need in
 the borough (families, disabled people, older, younger, and those on lower
 incomes). This approach would help in delivering mixed and balanced
 communities, and is likely to reduce social exclusion, deprivation and promote
 a sense of well-being among residents (SA Objectives 13, 14, 15, 18).
- Accommodating the needs of gypsies and travellers will address the housing needs of this group. The location of a suitable site or sites needs to address a range of socio-economic and environmental factors to ensure site selection meets the needs of this group, and is compatible with adjoining land-uses (SA Objectives 13, 14, 15, 18).

Environmental

• The provision of new housing stock provides an opportunity to design and build new houses according to higher energy efficient design standards. Measures such as designing and building housing to the standards contained in the Code of Sustainable Homes, incorporating decentralised energy systems and on-site renewables, will ensure that the efficient use of energy takes place, and domestic CO₂ emissions are reduced (SA Objectives 4, 7, 9, 13).

Key conflicts identified through the SA process

Socio-economic

- The economic viability associated with an individual scheme providing
 affordable housing needs to be considered. As does the additional demand for
 existing local infrastructure (open space, health and recreation facilities, public
 transport and the like) resulting from population growth and the associated
 need to provide additional housing (SA Objectives 1, 19).
- The location of a suitable site or sites for gypsies and travellers needs to address a range of socio-economic and environmental factors to ensure site selection meets the needs of this group, and is compatible with adjoining landuses. There is the potential for conflict (SA Objectives 13, 15, 18).
- Due to limited land resources within the borough, there is a risk associated with neglecting and promoting other land uses whilst accomplishing housing targets (SA Objectives 1, 2).

Environmental

 The use of natural resources and the impact of flooding and climate change, very much depends upon aspects related to implementation. Some temporary effects are identified on the natural environment resulting from construction, which can be prevented through the implementation of schemes such as the Considerate Constructors Scheme, Code of Construction or ISO 14001 or securing improvements through Section 106 (SA Objectives 4, 7, 10).

Mitigation measures

- It is important to ensure that the choices that are made under this theme
 achieves the maximum benefit in order to address the wide range of housing
 need in the borough. This includes the sustainable design and construction of
 any new housing.
- The Council and developers need to consider options to provide local
 infrastructure facilities to support any demand arising from new housing. The
 use of planning obligations should address this issue to some extent. However,
 a more coordinated and joint initiative among various council departments and
 developers could be looked at to ensure forecast need can be met.
- Any development must reduce and mitigate the potential impacts of flooding, and ensure the recommendations of Lewisham's Strategic Flood Risk Assessment and Sequential Test are implemented.

7.4.2 Growing the local economy

The Core Strategy policies appraised under this theme are as follows:

- Core Strategy 3 Strategic Employment Locations and Local Employment Locations
- Core Strategy 4 Mixed Use Employment Locations
- Core Strategy 5 Other employment locations including creative industries
- Core Strategy 6 Retail hierarchy and location of retail development.

Key benefits identified through the SA process

Socio-economic

- CS Policy 3 provides for a range of B Uses within the Strategic Industrial Locations. This will enable the continuing industrial functioning of London as a whole, and also support the local economy by ensuring that a reservoir of land is available for these lower value economic uses (SA Objectives 1, 2).
- CS Policy 3 safeguards Local Employment Locations to maintain a balanced economy and contribute to local employment opportunities. Employment and training can address deprivation issues and contribute towards health and well being (SA Objectives 2, 14, 15, 16, 17, 18).
- CS Policy 4 will provide for new and growing business sectors, provide more
 job opportunities and improve the physical environment. A more diverse
 economy can improve a range of social issues such as health, poverty and
 community cohesion (SA Objectives 1, 2, 14, 15, 17, 18, 19).
- CS Policy 4 will facilitate the physical regeneration of Deptford and New Cross thus bringing a number of social and economic benefits (SA Objectives 1, 2, 13, 14, 15 17, 18, 19).
- CS Policy 5 will maintain a balanced economy and contribute to local employment opportunities. Employment and training can address deprivation issues and contribute towards health and well being. The creative industries are recognised as employment growth sectors suitable for Lewisham in the Employment Land Study (SA Objectives 2, 14, 15, 16, 17, 18).
- CS Policy 6 maintains the retail hierarchy and will facilitate a more varied retail
 offer which will capture more local spending and reduce unnecessary shopping
 trips outside the borough. There is also the potential to create destinations that
 people want to visit thus providing benefits in terms of employment, reduced
 travel and the range of social improvements that improve health and well being
 and create a more cohesive community (SA Objectives 1, 2, 15, 16, 18, 19).

Environmental

 Retaining the recycling and waste management centre in the Strategic Industrial Location will contribute to meeting waste apportionment targets as set out in the London Plan (SA Objective 3)

Key conflicts identified through the SA process

Socio-economic

 Due to limited land resources within the borough, it will be necessary to balance the achievement of employment and retail aims with other competing land uses, particularly residential development to ensure that other important targets are met (SA Objectives 1, 2, 13).

Environmental

- CS Policy 3 retains industrial uses, however, this may increase the proportion of industrial waste. Retaining warehouse and utility uses may add to the existing local transport activity thereby increasing air pollution and CO₂ emissions in the borough and have other potentially negative effects.. However, failure to reserve land for these essential uses within London would probably result in greater negative effects on CO₂ emissions and air quality overall. These services would still need to be provided but would need to travel greater distances (SA Objectives 2, 3, 7, 8, 9).
- CS Policy 6 promotes retail uses in the borough which is likely to increase the proportion of waste (SA Objective 3).

Mitigation measures

It is important to ensure that the land use choices that are made achieve the maximum benefit for the whole community. Striking a balance between delivering employment and retail targets and other land uses is a must. New development must reduce and mitigate the impacts of flooding, especially if construction is taking place in areas identified in the Strategic Flood Risk Assessment as vulnerable to flooding.

7.4.3 Climate change and environmental management

The Core Strategy policies appraised under this theme are as follows:

- CS Policy 7 Climate change and adapting to the effects
- CS Policy 8 Sustainable design and construction and energy efficiency
- CS 9 Improving local air quality
- CS Policy 10 Managing and reducing the risk of flooding
- CS Policy 11 River and waterways network and water quality
- CS Policy 12 Open space and environmental assets
- CS Policy 13 Addressing Lewisham's waste management requirements.

The assessment shows that each policy under this theme contributes positively to most of the SA objectives.

Key benefits identified through the SA process

Socio-economic

 Protecting open spaces, managing and mitigating the risk of flooding, improvements along river corridors, enhancing biodiversity, and improving local air quality will have a positive cumulative impact towards improving the quality of life for residents (SA Objective 5, 6, 7, 9, 10, 11, 14, 19).

- CS Policies 7 and 8 allows the Council to seek higher environmental and sustainable design standards for new developments which would impact positively on the principle of sustained economic growth (SA Objective 1).
- CS Policy 12 seeks to improve the quality of open spaces which impacts positively on biodiversity. This will also provide better recreational opportunities for local residents contributing towards health and well being (SA Objectives 5, 6, 14, 18, 19).
- CS Policies 10, 11 and 12 seeks to enhance the river corridor along the rivers Ravensbourne and Quaggy. This will contribute towards promoting social inclusion by creating places to interact, promoting health and well being, and potentially reducing crime and anti-social behaviour (SA Objectives 14, 15, 17).
- CS Policies 10 and 11 will help to reduce flood risk which in turn benefits the local economy and well-being of residents (SA Objectives 1, 14).

Environmental

- CS Policies 7 and 8 ensures improvements in energy efficiency and reduces carbon emissions through proactive approaches (SA Objective 7, 9).
- CS Policy 8 seeks on-site renewable energy generation for both residential and non-residential development (SA Objectives 4, 9).
- CS Policy 8 not only contributes in reducing local CO₂ emissions but will also contribute to delivering national and regional carbon reduction targets (SA Objectives 9, 10).
- CS Policy 10 requires the submission of a Flood Risk Assessment (FRA) and implementation of SUDS and living roofs and walls. This will assist in flood risk reduction (SA Objective 10).
- CS Policies 8, 11 and 12 will enhance the townscape and landscape through the provision of living roofs/walls and the protection and provision of open spaces will improve local air quality, biodiversity and contribute to flood reduction. Improvements along the borough's river corridors will improve their physical and social quality (SA Objective 5, 6, 7, 11).
- CS Policy 13 will contribute to dealing with existing and future waste apportionment figures (SA Objective 3).

Key conflicts identified through the SA Process

The policy options promote mitigation and adaptation measures to reduce the negative impact on climate change, flooding, waste and other environmental features and as such do not show any conflicts.

Mitigation measures

It is important to make sure that all targets and recommendations set out in these options are met and realised to get the maximum benefits for both the natural and built environment.

7.4.4 Building a sustainable community

The Core Strategy policies appraised under this theme are as follows:

- CS Policy 14 Sustainable movement and transport
- CS Policy 15 High quality design for Lewisham
- CS Policy 16 Conservation areas, heritage assets and the historic environment
- CS Policy 17 The protected vistas, the London Panorama, and local views, landmarks and panoramas
- CS Policy 18 The location for tall buildings
- CS Policy 19 Provision and maintenance of community and recreational facilities
- CS Policy 20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles
- CS Policy 21 Planning Obligations

Key benefits identified through the SA process

Socio-economic

- CS Policy 14 will contribute in reducing the need to travel which will address
 existing local air quality and noise pollution issues in the borough and impact
 positively on the quality of life of residents. Good transport links to the
 neighbouring boroughs and London can enhance business activity which could
 contribute to the existing economy (SA Objective 2, 7, 8, 14).
- CS Policy 14 promotes walking and cycling and a controlled approach to parking will contribute to the health and wellbeing objective. The policy is likely to contribute positively towards the efficient use of natural resources by reducing car travel and promoting public transport (SA Objectives 4, 7, 8).
- CS Policies 15, 16 and 17 impacts positively on townscape and promotes a sense of identity (SA Objectives 11,12).
- CS Policy 19 impacts positively health and well being, addresses deprivation, contributes to improvements to education, skills and training and maintains provision and access to a range of community infrastructure (SA Objectives 14, 15, 16, 19).
- CS Policy 19 impacts positively on improving the existing quality of life of residents and contributes to community well-being (SA Objectives 13, 15, 17, 18, 19).

Environmental

• CS Policy 14 addresses accessibility and connectivity issues. The promotion of sustainable modes of transport such as walking and cycling will help mitigate climate change by reducing CO₂ emissions, and air and noise pollution. It will also enhance the quality of existing open spaces and biodiversity in the borough. The movement of freight can benefit the local economy but at the same time it could have some negative impacts on air or water quality or could interrupt the ecological features/ aquatic life due to the disturbances created by such means of transport. Similarly, the improvements along river corridors

could improve the quality of water and physical environment (SA Objectives 6, 7, 8, 9).

Key conflicts identified through the SA process

Socio-economic

- CS Policy 18 could impact negatively on strategic and local views, or if placed next to water, could impact negatively to the aquatic life. The creation of wind tunnels and other micro climate issues would be a negative impact (SA Objectives 7, 8, 9).
- The use of natural resources, and the impact of flooding and climate change, depends upon aspects related to implementation. Therefore the implementation of each policy option is critical to achieve the environmental aspirations set out the in the Core Strategy. Some temporary effects on the natural environment are identified resulting from construction, which can be prevented through the implementation of schemes such as the Considerate Constructors Scheme, Code of Construction or ISO 14001 or securing improvements through Sec 106 (SA Objectives 7, 8, 9).
- CS Policy 19 could impact negatively due to limited land resources and the need to secure sufficient land to provide suitable infrastructure facilities. CS Policy 21 will act as a tool to secure such provisions (SA Objective 19).

Mitigation measures

It is important to ensure that the land use choices that are made achieve the maximum benefit for the whole community. Striking a balance between delivering employment and retail targets and other land uses is a must. New development must reduce and mitigate the impacts of flooding and mitigation measures, especially if construction is taking place in areas identified in the Strategic Flood Risk Assessment as vulnerable to flooding.

The interrelationship between effects

There is no standard methodology for assessing the interrelationships between effects. The SA and SEA Scoping Report identified potential interactions and cumulative and indirect effects became apparent during the progression of the SA and SEA. The indirect and cumulative effects identified within the following section are associated with interrelationships. The consideration of the interactions between the effects of Lewisham's Spatial Strategy and the Core Strategy policies was an essential part of the assessment of cumulative effects.

7.5 Appraising the strategic site allocations

The Core Strategy identifies five strategic sites located within the Regeneration and Growth Areas that will play a central role in place making; creating a very different place to what currently exists and transforming the wider area. Five strategic sites have been identified:

- Convoys Wharf
- Surrey Canal Triangle
- Oxestalls Road
- Plough Way
- Lewisham Gateway

The scale of the potential redevelopment and regeneration opportunities offered by these sites, their impacts on the delivery of the Core Strategy objectives and the need to facilitate delivery of the redevelopment of these sites, renders necessary their inclusion as strategic sites within the Core Strategy. As such, specific policies, explanatory text and diagrams provide clear guidance to developers on the requirements for a planning application in order to ensure the achievement of the Core Strategy vision, objectives and strategy.

This section summarises the appraisal of the policies concerning each of the strategic sites. The full appraisal is provided in Appendix 7.

Key benefits identified through the SA process

Socio-economic

- Effects on socio economic objectives were positive for all the strategic sites.
 The developments are expected to provide an increased number of jobs in a more varied range of firms offering new types of employment, which will support the local economy and help it to grow.
- For Convoys Wharf a specific benefit is identified due to the proposed reopening of the wharf which would support new green industries and the transport of goods by river.
- The Lewisham Gateway development will support the role of Lewisham Town Centre in offering a good range of retail and employment opportunities and consolidates its position as the main Town Centre in the Borough.
- All the strategic site allocations are considered to present opportunities to increase community cohesion and focus, feelings of identity and reduce the fear of crime by providing new high quality environments with appropriate supporting facilities.
- The sites are also expected to make a major contribution to providing new high quality housing for the borough to meet identified needs, and reduce deprivation levels and health inequalities.

Environmental

 The development of these sites will lead to replacement of old building stock, with new energy efficient and sustainable housing and business premises.
 Most of these areas are largely hard surfaced with little green space within

- them. One site in particular has a use that is not suitable for its location and causes environmental problems.
- Redevelopment will enable the introduction of more open and amenity space, increase biodiversity and enable the introduction of sustainable drainage techniques in areas that are in Flood Risk Zone 3a.
- These areas are generally speaking low in environmental quality. The industrial areas in particular present a bleak appearance with few visual and physical benefits.
- Development of these sites is expected to produce big improvements in the quality of the urban environment in the Deptford/New Cross area of the because of their size, number and geographical spread.
- Convoys Wharf has a number of heritage features that are expected to be made accessible and enhanced by the new development. The use of Convoys Wharf to handle goods by river transport will reduce use of road transport.
- The development of Lewisham Gateway will improve traffic handling at a busy junction and increase accessibility to the local river network.

Key conflicts identified through the SA process

Socio-economic

Many of these sites are currently in use by existing businesses which will need
to relocate either elsewhere or in the new developments. Some business
activities may not be suitable for a mixed use environment involving residential
development. There may be a temporary drop in economic activity while the
new developments are being constructed and a loss of jobs that may not be reprovided.

Environmental

- Redevelopment will inevitably have an environmental cost in terms of
 construction traffic, and the use of materials and the energy involved in their
 production. Many of the sites involved are also not used intensively and so,
 although they are currently in industrial use, traffic movements associated with
 them are likely to be relatively low.
- New development will involve a much more intensive use of land, with more businesses and residential development at a relatively high density which will generate more traffic movements than at present with the associated impacts in of increased waste production, and noise, air pollution and greenhouse gas generation
- A number of the sites have low public transport accessibility levels which do not currently accord with the level of development proposed. The developments in the case of sites in Deptford/New Cross will involve the introduction of more vulnerable residential uses in areas of high flood risk (Flood Zone 3a).

Mitigation measures

It is important to ensure that the land use choices that are made achieve the maximum benefit for the whole community. New development must reduce the impacts of flooding and, especially if construction is taking place in areas identified in the Strategic Flood Risk Assessment as vulnerable to flooding by provision of new open space, sustainable urban drainage techniques. Various measures will be needed to mitigate the short term impact of construction on these sites. Support to businesses that are not able to relocate on the sites should be provided. New public transport measure will be required to reduce the impact of the increased traffic movements and help new residents to use public transport instead.

8. Cumulative and long term effects

Cumulative impacts refers to the total or combined impacts or effects arising from the implementation of the strategic spatial strategy and each particular policy option. The impact or effect can be negative or positive.

For example, if a housing development is proposed with associated transport improvements, then this is likely to address both housing and transport issues. This can benefit the wider community and contributes towards making the development more sustainable. On the other hand, an increase in the number of homes in an area is likely to place pressure on the existing reserve of natural resources and the demand and accessibility to local and regional infrastructure.

8.1 Methodology

Identifying the cumulative impacts of the Core Strategy is a complex process and various methods and techniques have been identified in the SA guidance to carry out this exercise. Lewisham has adopted a matrix approach to assess cumulative impacts in order to provide a clear visual summary. The exercise was broken down into two stages.

The first stage involved a cumulative impact assessment for each policy option in the Core Strategy. This can be found in Appendix 6.

The second stage involved a cumulative assessment of the effects identified for each Strategic Site. This appraisal can be found in Appendix 7.

8.2 Appraisal findings

A summary of the cumulative impacts of both stages of the assessment as it impacts the SA objectives is provided below.

8.2.1 Economic

Overall, there are likely to be positive cumulative effects on economic growth and employment with the retention and protection of strategic industrial locations. The promotion of mixed use employment locations on land currently designated used exclusively for business and industrial uses will:

- broaden the existing economic base in these currently poorly performing areas, and in so doing will promote new enterprises and will boost employment
- allow for the provision of a variety of new housing types and tenures in the borough
- increase the availability of new services, including new health, leisure and retail facilities
- improve perceptions of public safety in these areas and will foster an increased sense of community identity.

The cumulative effect of these developments will also serve to positively address deprivation issues and can increase a sense of community identity in these areas.

8.2.2 Environmental

The implementation of the core strategy climate change policies will have an overall positive cumulative overall effect on the environment by resulting in:

- A reduction of carbon emissions and the use of natural resources due to the implementation of energy efficient building standards and the promotion of on-site renewable energy, decentralised energy and living walls and roofs. This can have an indirect impact in reducing the negative impacts of climate change including flood risk.
- Improvements to local air quality, which will have a positive impact on health and well-being and will indirectly influence greenhouse gas reductions.
- Developments only being permitted in areas of flood risk if they comply with the
 requirements of the Strategic Flood Risk Assessment and the Government's
 'sequential test' approach. This ensures that flood risk will be minimised and can also
 lead to the adoption of suitable improvements to flood defences and other mitigating
 measures as needed. The focus on river naturalisation as a means to reduce flood
 risk will also benefit biodiversity levels in the borough, while the adoption of SUDS will
 positively impact on the water quality of the borough's rivers.
- The protection of the borough's existing spaces. This will positively impact on biodiversity levels, the urban fabric and streetscapes and will improve health and well-being by encouraging people to make use of these spaces. The use of these public spaces will positively impact on the public realm and will foster an increased sense of community identity and social cohesion.
- Less waste being generated and an increase in recycling across the borough across both the domestic and commercial sectors.

8.2.3 Social

There are likely to be very positive cumulative impacts on the social fabric of the borough as a result of an improved streetscape and townscape and the conservation of the historical environment. A sensitive approach to applying best practice urban design standards will ensure a high quality built environment in Lewisham. The following cumulative benefits are likely:

- There are likely to be positive cumulative sustainability impacts from the implementation of policies relating to community services. The Council's Infrastructure Delivery Plan has identified when and where future leisure, health and educational facilities will be needed to cater to the projected growth in population. Factoring future infrastructure needs at an early stage of the planning process will ensure that opportunities to maximise education, health, well-being, safety and community identity can be maximised.
- Providing sufficient resource-efficient housing, additional local employment
 opportunities and improved infrastructure facilities is likely to result in an improvement
 in the health and well-being of the community. This can positively impact upon
 community safety, deprivation issues and crime and social exclusion.

8.3 Proposed mitigation measures

SA guidance requires the adoption of mitigating measures that will prevent reduce or minimise as far as possible any significant adverse effects of implementing the Core Strategy. The predicted effects of the Core Strategy have been evaluated and this highlights the need to balance the Council's growth objectives with the protection of the borough's open spaces and environmental assets and its social fabric and character.

While the Core Strategy is considered to contain the most sustainable options, cumulatively as a whole, some negative impacts may result from its implementation. This relates to an increase in waste production and a decline in air quality associated with population and economic growth. Mitigation measures such as planning conditions or developer contributions will need to be implemented at the planning application stage to avoid or minimise any predicted negative impacts. Thus, while each policy has been appraised for its predicted significant effect on the borough, in practice the appropriateness of development proposals will require consideration of how these policies interact with each other and the best mitigation measures that can minimise any adverse impacts that may arise.

Key mitigation measures are detailed below.

Core Strategy policy	Predicted effect Mitigation measures			
SA objective 1				
Spatial Policies 1, 2, 3, 4, 5 CSP1	Land allocated for housing does not add to the supply of employment land, unless part of a mixed-use allocation. Although additional population can increase the local employment base and contribute to economic growth. Mixed-use sites shou employment uses as land use mix. Where appropriate, planning obligations and other make provisions for a unemployed and low earners.			
SA Objective 2				
Spatial Policies 1, 2, 3, 4, 5 CSP1	Land allocated for housing does not add to the supply of employment land, unless part of a mixed-use allocation. Although additional population can increase the local employment base and contribute to economic growth.	Appropriate housing locations should be located close to potential workforce. Mixed-use sites should include employment uses as part of the land use mix. Where appropriate, planning obligations can make provisions for local employment.		
SA Objective 3				
Spatial Policies 1, 2, 3, 4, 5	New homes and business will inevitably create more waste. Any redevelopment will increase waste. In the short term by construction waste as a result of the development and in the longer term by increased occupancy whether residential or commercial.	Policies on waste reduction and require facilities for recycling. Increase recycling including reuse of construction waste. Encourage reduction of packaging materials etc.		
CSP19	Some negative impacts where the construction and operation of new facilities will generate waste aggregates	Require a reduction in waste generate through reuse of demolition waste in construction, sourcing of sustainable materials, and recycling aggregates. During the operational phase the provision		

Core Strategy policy	policy Predicted effect Mitigation measures				
Spatial Policies	Additional housing has a negative impact	of recycling facilities on site would be a further mitigation measure. This can be achieved through appropriate planning policies on waste management and s106 agreements. Provide space for recycling			
1, 2, 3, 4, 5 CSP1	where construction waste can be significant, as well as waste from the increased population.	facilities in development and encourage the application of the waste hierarchy. Reuse and recycling of construction/demolition waste. These are all preferred option DC policies.			
Spatial Policies 1, 2 CSP3	The protection of SIL will ensure that there are sufficient sites to handle the borough's waste, thereby leading to an increase in waste recovery and recycling as a direct effect. Business operations are likely to generate waste and successful business operations often do not lead to a reduced consumption of materials and resources, and represent an increase in use as an indirect effect. The retention and use of the existing buildings for employment uses rather than their redevelopment for other uses will lead to no increase in construction waste other than those business uses whose function is in the construction industry.	Businesses can be encourage to minimise the amount of packaging used in their products. Encourage disposal of waste according to the waste hierarchy.			
Spatial Policies 1, 2 CSP4 Strategic Site Allocations 2, 3, 4, 5	Comprehensive redevelopment on these sites will have an effect in the short term of increasing construction waste by the demolition of buildings and the construction of new ones. More intensive use of these sites both for residential and business uses will result in an increased generation of waste.	Increase recycling/reduction of waste. Encourage commercial uses to take measures to reduce the amount of waste generated and packaging used. Encourage the reuse of building materials if possible. Waste to be dealt with in accordance with the waste hierarchy.			
Spatial Policies 1, 2, 3, 4, 5 CSP5	It is uncertain whether the retention of properties in business use will have a positive or a negative effect on waste generation. Business uses are generally fairly high generators of waste but this depends on the size of the business and the uses in question. They are often very small scale, and the type of use that might be proposed to replace it. Redevelopment of some buildings might cause short term increase in construction waste.	General waste reduction measures/recycling as appropriate. Waste to be dealt with according to the waste hierarchy.			
Spatial Policies 1, 2, 3, 4, 5 CSP6	The retail sector generates waste materials that have been used for packaging goods and additionally indirectly increases household waste.	Require commercial development to reuse, recycle demolition/construction waste and encourage reduction and recycling of packaging materials by requiring space for on-site recycling facilities.			

Core Strategy policy	Predicted effect Mitigation measures		
SA Objective 4			
CSP19	Some negative impacts as water is used for construction, and operation of facilities (e.g. showers, pool, maintenance).	Appropriate planning policies on water use management requiring development to install water saving devices. Implemented through BREEAM assessment or equivalent and s106 agreements.	
Spatial Policies 1, 2, 3, 4, 5	Increased development and population increase will impact on water resources and may have adverse impact on water quality Use of water efficiency measures, SUDS and maximising infiltration a Cumulative impact of a housing needs to be recognised. Water qua consumption and recycle measures needs to be as part of construction.		
CSP3	The retention of these sites will mean that their hard surfaced servicing areas will be retained and there will be fewer opportunities to install SUDS. Industry often uses large amounts of water.	Many business developments have roofs of a suitable pitch for living roof installation. These could be encouraged by various ways as a means of mitigating the large hard surfaced areas	
CSP4 Strategic Site Allocations 2, 3, 4, 5	Comprehensive redevelopment on sites that are not intensely used might increase water usage by the introduction of high density residential development. New development might conversely result in improved use of urban drainage techniques and improve the quality of ground water.	Introduce water saving devices into the new development such as water butts, shower heads and other water recycling measures. Use sustainable urban drainage techniques where possible.	
CSP6	Water usage will increase although the degree to which this happens depends upon the mix of uses. A3 uses are likely to require more water resources than A2	Commercial development to use water saving devices and SUDS.	
SA Objective 5			
Spatial Policies 1, 2, 3, 4, 5	No impact on designated sites but new public open spaces will be created as part of major redevelopment.	Other policies will ensure the safeguarding of any established protected species. An ecological assessment could establish if any protected species exist. Protected species may already be thriving in an existing development and could be under threat from expansion or the change of use.	
Spatial Policies 1, 2, 3, 4, 5 CSP1, 2	Housing development may impact provision of open space if land available for development is limited.	Housing developments should provide on-site open space. Sensitive building design in and near areas of open space can	
CSP3, 5	This policy will not improve biodiversity or open space provision in the borough	reduce impacts on biodiversity. The encouragement of living roofs and walls might improve biodiversity on these sites	
CSP6	Large retail and leisure units could provide habitats as a consequence of its location and scale of development.	This could relate to established species under threat from town centre development destroying the habitat. A thorough	

Core Strategy policy	redicted effect Mitigation measures		
		ecological assessment could establish if any protected species are present. Protected species may already be thriving in an existing development and could be under threat from expansion or the change of use. Mitigation measures could be an addition into the policy for the safeguarding of any established protected species.	
SA Objective 6	Development may destroy behitete, eyeb	Identify any protected/priority	
Spatial Policies 1, 2, 3, 4, 5	Development may destroy habitats, such as those on derelict and vacant plots of land.	Identify any protected/priority habitats or species at the development proposal stage. Implemented via DC policies	
Spatial Policies 1, 2, 3, 4, 5	Redevelopment may lead to losses of habitats and is likely to have a negative impact on biodiversity.	This can be mitigated by landscaping, replacement of habitats, green roofs etc.	
CSP3, 5	These policies will not improve biodiversity or open space provision in the borough.	The encouragement of living roofs and walls might improve biodiversity on these sites	
SA Objective 7			
Spatial Policies 1, 2, 3, 4, 5	The policies are designed to provide development that is appropriate to the context – higher density close to transport nodes, and lower density further away from forms of public transport. This may have a negative effect in increasing traffic movement in areas that are already heavily trafficked and have been declared Air Quality Management Areas. However, location of development near to public transport would have a long term positive effect by increasing use of public transport and reducing private car journeys.	Locate development in areas with good public transport and reduce car parking allowance. Require air quality assessment and provide a mechanism for estimates of expected pollutant levels at development proposal stage.	
CSP19	Some negative impacts created by road traffic emissions by vehicles accessing the facilities.	Make facilities accessible by sustainable modes of transport, improving walking and cycling routes, through appropriate planning policies and s106 agreements.	
CSP1	Additional housing is expected to adversely affect CO ₂ emission (construction, occupation, energy needs and use outside the home, use of private vehicles, under provision of public transport).	Housing to be built in accordance with sustainable design and energy reduction policies. Locate denser development near public transport and ensure transport policies used in the assessment of housing – travel plans, car free, restricted parking, transport assessment etc.	
CSP 3	Provision of local business and industrial areas will improve air quality overall in that goods and services and people	Increased use of less polluting vehicles and increase provision of public transport. Location of	

Core Strategy policy Predicted effect Mitigation measures				
e one of the state	travelling to work have less distance to travel. However local deliveries and traffic movements, and industrial activities may have local effects on air quality. The Surrey Canal Strategic Employment Location which is a major concentration of business and industrial activity is very poorly served by public transport.	these sites will need to mitigate environmental impacts, or building design will need to minimise these.		
CSP4	It is likely that new high intensity development will result in increased car movements from residents and more businesses and thereby potentially a deterioration in air quality.	Transport Plans and parking standards (car-free development) to reduce car use. Use of less polluting vehicles and improvements in public transport.		
CSP5	Preservation of premises in the B Use Class in will ensure the existence of local jobs and services which should reduce the need to travel long distances and thereby a reduction in car use overall. There are potential local adverse impacts on air quality dependent on the nature of the business activities on these sites.	Ensure that these sites are appropriately located or designed to mitigate any adverse impact		
CSP6	Any new development within the town centre will have an impact on air quality. In the short term will be the impact from construction.	Other policies in the plan seek to control the level of air pollutants being emitted from new development.		
SA Objective 8				
Spatial Policies 1, 2, 3, 4, 5	New development will increase vehicular traffic. Increase in the boroughs population has potential adverse transport impacts - potential increase in car use and under provision of public transport.	Locate development in areas with good public transport and reduce car parking allowance. Require on-site cycle provision. Council to support and lobby for improved public transport in the borough.		
Spatial Policy 5 CSP16	This policy proposes that large areas of the borough retain their current form. Some of these areas are town centres, some are urban or suburban areas of residential development, with limited restrictions on street parking which might not reduce car use.	Improve public transport provision and improve accessibility through walking and cycling connections.		
CSP19	Some negative impacts created by traffic generated for accessing the facilities. Particular impact from school run which can create congestion at specific times of day.	Make facilities accessible by sustainable modes of transport, improving walking and cycling routes, through appropriate planning policies and s106 agreements, school travel plans implemented via the Local Implementation Plan.		
CSP1	Increase in the boroughs population has potential adverse transport impacts - potential increase in car use and under provision of public transport.	Need to ensure additional housing is located in areas with good public transport or in areas capable of providing good public transport. Should take account of specific transport needs and assessment.		

Core Strategy policy	Strategy policy Predicted effect Mitigation measures				
CSP 3, 5	Provision of local business and industrial	Increase public transport			
	areas will improve air quality overall in that goods and services and people travelling to work have less distance to travel. The Surrey Canal Strategic Employment Location which is a major concentration of business and industrial activity is very poorly served by public transport.	provision to Surrey Canal Strategic Employment Location.			
CSP4 Strategic Site Allocations 2, 3, 4, 5	It is likely that new high intensity development will result in increased car movements from residents and more businesses and thereby potentially a deterioration in air quality.	Transport Plans and parking standards (car-free development) to reduce car use. Use of less polluting vehicles and improvements in public transport.			
SA Objective 9		pasie transport.			
Spatial Policies 1, 2, 3, 4, 5	New development will lead to increased energy consumption. Redevelopment inevitably has a negative impact on energy consumption both in the short term arising from construction and in the loner term from increased activity and occupancy.	Require energy efficiency measures and use of renewable energy.			
CSP1	Additional housing is expected to adversely impact CO2 emission (construction, occupation and energy needs and use outside the home).	Housing to be built in accordance with sustainable design and energy reduction policies.			
CSP 3	Manufacturing processes will increase emissions of greenhouse gases. Local businesses and firms providing services locally and to the centre of London will have a beneficial effect by reducing the amount of energy required to transport goods.	Installation of energy efficiency measures in manufacturing processes and buildings and use of appropriate energy efficient vehicles.			
CSP5	Most of the premises covered by this policy will be retained in some form of uses whether B use Class or some other use which will involve the consumption of energy so there will be neither a positive or negative effect. It is possible that there will be redevelopment of some buildings which will cause a short term increase in energy use – but in the longer term a new building with energy efficiency measures will decrease use of energy.	Standard energy efficiency measures			
CSP16	Many buildings do not have modern energy saving features. In Conservation Areas (especially those with Article 4 Directions, which limit permitted development rights), and for Listed Buildings, planning applications to introduce such features as domestic wind turbines and solar panels might be more restricted. However, there will be reduced construction energy costs if older buildings are retained.	Produce guidance advising how best to install energy saving features in Conservation Areas. Ensure any new development is built with energy saving devices.			

Core Strategy policy	y Predicted effect Mitigation measures				
CSP19	Some negative impacts created by the energy used for development and running of facilities, and traffic generated for accessing the facilities and hence burning of fossil fuels.	Make green construction practices a requirement through planning policies and introduce school travel plans through the LIP.			
SA Objective 10 Spatial Policies 1, 2, 3, 4, 5	Part of the growth corridor is in an area liable to flood. Some areas, especially conservation areas are within flood risk areas. They have not been designed to cope with the risk of flooding. Redevelopment in these areas will be at risk of flooding, and has the potential to increase the risk of flooding due to increased run off.	Require flood risk assessment, SUDS and other mitigation for flood risk. Ensure as far as possible that front gardens are retained to minimise run off, and provision of green roofs etc.			
CSP1	Additional housing may be located in areas subject to localised flooding and/or near the Thames River. Increase in property numbers and possible increase in hard standing areas can contribute to an increase in flood risk.	Land in the major growth corridor is affected by flooding as identified by the Environment Agency flood maps. There is flood risk if the Thames Barrier were to fail. Flood assessments to be carried out as part of the development assessment process and advice followed in accordance with PPS 25. The area of 'hard landscaping' should be minimised and onsite open space and permeable surfaces provided in higher density developments.			
CSP3, 4, 5	Many of the developments on Strategic Employment Locations and Defined Employment Areas are within the Flood Risk Areas of the Borough. Most of these sites have large areas of hard-standing which causes water run off and are older developments which have no measures to mitigate flood risk.	Encourage introduction of more green elements and living roofs to these locations, and sustainable urban drainage systems.			
CSP6	This will have an impact on increased surface runoff and a lack of permeable surfaces. The north of the borough and the River Thames tributaries which run within the borough are susceptible to flooding due to loss of permeable surfaces from town centre development could increase the likelihood of flooding.	Sustainable design techniques which improve the mitigation methods for reducing the chance of flood risk.			
CSP14	Public transport infrastructure may be located in flood risk areas. Surface water runoff (from parking areas) can contribute to local flood risk. Walking and cycling routes may be located in flood risk areas.	Construction of new public transport corridors needs to assess flood risk. Parking surfaces should be impermeable wherever possible, have adequate drainage and possible reuse water runoff for other uses. Need to assess flood risk.			
CSP16	Some conservation areas are within flood risk areas. They have not been designed	Consider flood mitigation measures in those planning applications that do come			

Core Strategy policy	Predicted effect	Mitigation measures
	to cope with the risk of flooding.	forward. Ensure as far as possible that front gardens are retained to minimise run off.
CSP19	Increase in exposure to risk if facilities are located in the flood risk area. Avoid locating facilities in risk areas. Follow the sequential test.	
SA Objective 11		
Spatial Policies 1, 2, 3, 4, 5	Any physical development will have an impact, however, the focus will be on improving areas.	Other policies and supplementary planning documents provide a framework for all new development.
CSP3	The retention of these sites will not have a positive effect on the landscapes and townscapes of the borough. Most of the sites comprise of industrial sheds of relatively low urban design quality (with some exceptions) and large areas of hard surfacing.	More could be done to provide attractive landscaping and screening for these sites to improve the overall quality of the streetscape particularly in the Surrey Canal Strategic Employment Location
CSP5	The effect on townscapes of this policy will depend largely on the location of the premises and whether commercial uses contribute to the particular townscape of an area - e.g. commercial office premises in a town centre will often contribute to the overall town centre character. In other locations the effect of commercial premises e.g. scaffolding yards in a residential location the effect of maintaining these uses will be more negative.	Criteria based policy to judge individual cases
CSP14	Need to ensure traffic management and new public transport/interchange facilities contributes positively to townscape. Design of additional and/or improvements to walking and cycling routes will need to be in context.	Traffic projects should be integrated with the landscape and townscape to make a positive contribution to the character of the local area. New routes and/or improvement to existing routes to make a positive contribution to the character of the local area.
SA Objective 12		
Spatial Policies 1, 2, 3, 4, 5	Any physical development will have an impact, however, the focus will be on improving areas. It will be necessary that these policies are in-keeping with the historic character.	Other policies and supplementary documents provide a comprehensive framework for all new development.
CSP3	The sites within the Surrey Canal Strategic Employment Location are in an Area of Archaeological Priority as defined by English Heritage (Greater London Archaeological Service). This means that redevelopment in these areas that might reveal remains of interest will require an assessment and preservation in accordance with central government legislation and a UDP policy. This policy does not necessarily promote	Legislation requires archaeological assessment and appropriate remediation investigation and preservation.

Core Strategy policy Predicted effect Mitigation measures					
	redevelopment on these sites, but on the other hand relocation of waste uses and the associated environmental mitigation might mean that there might be extensive land works that require archaeological assessment.				
CSP5	Some uses will contribute to the historic environment in which they are located for example workshop uses in Havelock Walk and uses in Brigade Street Mews. Some uses in other locations will be more damaging to the character of historic environments and would be better redeveloped either for other commercial uses or housing.	Other policies and supplementary documents provide a comprehensive framework for all new development.			
CSP14	Need to ensure traffic management and new public transport/interchange facilities contributes positively to townscape. Design of additional and/or improvements to walking and cycling routes will need to be in context.	Traffic projects should be integrated with the landscape and townscape to make a positive contribution to the character of the local area. New routes and/or improvement to existing routes to make a positive contribution to the character of the local area.			
CSP15	Development that is responsive to its context has the potential to enhance the historic environment. The emphasis however will usually be on conservation and adaptation of existing buildings. Redevelopment has the potential to alter or remove the character of historic areas.	Ensure that conservation areas have conservation areas appraisals that identify those elements of the historic environment that should be retained.			
SA Objective 13					
Spatial Policies 1, 2, 3, 4, 5 Strategic Site Allocations 2, 3, 4, 5	The growth and regeneration of sufficient and decent housing will be an important factor within these policies. Housing will play a major role in mixed use development.	Ensure mixed and balanced communities through housing mix/tenure policies.			
CSP1	The strategy provides for a target of 14,625 additional dwellings in the borough by 2026. Negative impact if mix of tenures and affordable housing provision is not provided. All development schemes of 10 or more dwellings will be set a target of 50% affordable housing. This positively impacts affordable housing. The council will ensure housing size and tenure mixes are maintained in the long term.	Ensure housing developments have an appropriate mix of dwellings. Annual monitoring of affordable housing should be carried out to evaluate delivery. Annual monitoring of affordable housing should be carried out to evaluate delivery.			
CSP3	Protecting employment sites will have the effect of removing the possibility of using these sites for housing development.	Ensure that sufficient housing sites are designated elsewhere in the borough to meet housing provision targets			
CSP4	Redevelopment of these sites for high density mixed use and commercial development will make a big contribution to meeting housing provision targets. There is a possibility that in many cases,	Ensure that some sites or parts of sites have substantial elements of housing designed that is suitable for family			

Core Strategy policy	re Strategy policy					
	the nature of the development (flats above commercial development) the environment will not be suitable for families and the mix will not make much provision for family housing, which would not meet identified housing need.	occupation.				
CSP5	The policy seeks to protect existing commercial uses thereby reducing the opportunity to provide housing on these sites. They are usually quite small sites. Individually the number of houses that could be provided on each site would be small, but there could be a larger cumulative effect.	Ensure there are sufficient sites identified to meet housing provision targets.				
CSP12	Amenity space is important to providing sufficient and decent housing. This policy seeks to encourage further open space particularly within housing development as it is considered a vital feature. However, the protection of open space limits potential for housing developments and provision of affordable housing	No enhancement measures suggested as the benefit of open space will outweigh the need for housing in an urban area.				
CSP17	It is possible that should the height of tall buildings proposed in the viewing corridor would need to be reduced to met the requirements of the policy.	Ensure sufficient sites are allocated to meet housing targets.				
SA Objective 14						
CSP1	Ensure walking and cycling are promoted as part of any housing development. New housing areas should be linked with town centres, public transport and community facilities, including those for health and education.	Plans should ensure that proposals do not have significant health impacts.				
CSP3	Protecting employment sites will have the effect of removing the possibility of using these sites for health facilities.	This policy relates to a core of industrial sites suitable for various commercial uses that do not require a high quality environment. Other sites are being made available in the Borough, particularly in the northern half which is lacking in facilities for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match				
CSP5	The policy will reduce the possibility of these uses being replaced by health facilities.	Ensure in criteria based policy that these uses are one of the first alternative choices.				
CSP6	This policy could increase the level of health problems in and around the retail centres as more localised traffic would be predominant and more intensive.	Improve the level of public transport to these centres and restrict the amount of parking. Car free zones could feature.				
SA Objective 15						
Spatial Policies 1, 2, 3, 4, 5	Proposals will need to address deprivation. Potential for development to be 'closed' and not address or positively	Ensure mixed use development contributes to addressing deprivation - jobs, training,				

Core Strategy policy	Predicted effect	Mitigation measures			
Strategic Site	impact existing populations/residents.	improvements to physical and			
Allocations 2, 3, 4, 5		socio environment			
SA Objective 16					
Spatial Policies 1, 2, 3, 4, 5	Additional development will create jobs but need to ensure they arte provided to locals and assist in training and skill development.	Ensure developer contributions are sought for training.			
SA Objective 17					
	Potential for increased crime if more development/people.	Ensure any new development is built to 'Safer by Design' standards.			
CSP1	Additional housing and population increases may increase crime and its victims. Sufficient and decent housing, including affordable housing, may improve quality of life and have a positive beneficial reduction in crime rates. Increased population can improve natural surveillance.	Ensure developments built to 'safer by design' standards.			
CSP14	New public transport facilities such as interchanges, railway stations, and bus stops, can be areas for anti-social behaviour. Crime or its perception can occur on streets and/or at/near transport interchanges/facilities. Walking and cycling routes can provide areas for anti-social behaviour. Can also reduce crime due to social activity.	Traffic management, new transport facilities and any design related to transport infrastructure to be in accordance with Secured by Design standards.			
CSP3	Areas of land in single uses that are not used at night such as business and industrial estates are considered to increase crime and the fear of crime by leading to areas that are vacant at night. The common building form is often window free and public spaces are not overlooked. This can be a deterrent to those wishing to work in these areas and to 24 hour working where required.	Security measures for individual estates such as 24 hour caretaking and CCTV. Increase public transport provision through larger areas of this land.			
SA Objective 18					
CSP3	This policy by restricting the nature of uses on these sites will not contribute to community welfare.	This policy relates to a core of industrial sites suitable for various business uses that do not require a high quality environment. Other sites are being made available in the borough for mixed use development which represent opportunities to provide the core of more cohesive communities with the facilities to match.			
SA Objective 19					
None	None	None			
	•	•			

8.4 Uncertainties and risks

8.4.1 Uncertainties

The Core Strategy (the plan) has been assessed with the assumption that the economy, the natural environment and society does not diverge significantly from the current state of affairs. However, there can be unforeseen events that may alter the effect of the plan, such as global economic recession or environmental disasters. These are events that are beyond the control of plan making bodies and are in generally most effectively responded to by national bodies and emergency services.

It is difficult to accurately measure the significant effects of the Core Strategy on climate change as this can only be measurable over the long term. Many of the predicted impacts are dependent on the location and characteristics of a particular site. This has meant that assumptions and judgements have been made about the most likely impacts on an options. The impact could depend on how the policy was implemented.

8.4.2 Risks

The SA was carried out by Council planning officers and was independently reviewed by the Landscape Partnership. Although guidelines have been provided to ensure consistency, they allow scope for a wide variety of differing methodologies and do not overcome the significant subjectivity that is inevitable when judging sustainability effects.

There is potential for subjective decision making leading to different appraisal scores by different planning officers and/or between local planning authorities. This has been overcome by policy officers working together on the tasks of predicting and evaluating the social, environmental and economic effects of the Core Strategy policies.

Lack of specialist technical knowledge may also be identified as a risk to the process, in particular the knowledge needed to rigorously assess certain impacts against some of the sustainability appraisal objectives and this could influence some individual assessments. As such, the benefits of group working enabled a consensus of opinion to be made where impacts are uncertain, for example where they may be difficult to measure over the period of the Core Strategy.

9. Proposals for monitoring

The evidence of how the SA objectives are being affected can only be detected by looking at evidence of how economic, environmental or social circumstances are changing in the borough over time. It is proposed that the effects of the objectives will be assessed using the monitoring framework provided in Appendix 9.

Appendix 9 details the sustainability appraisal objectives, appropriate indicators, current results, trends/comparator, frequency and period of monitoring and any targets that have been set. These are closely linked to the indicators of the Annual Monitoring Report, the Local Area Agreement, the monitoring framework of the Core Strategy and other local or regional plans such as the Biodiversity Action Plan and the Local Implementation Plan (transport) to ensures consistency and accuracy of data.

SA guidance states that SA monitoring should take an objectives and targets approach. It may be used to assess:

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

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

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

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

10. Next steps

Following a period of consultation on the proposed submission version of the Core Strategy and this Sustainability Appraisal, the Submission version of the Core Strategy will be prepared along with a final Sustainability Appraisal.

The SA adoption statement will be published to demonstrate how environmental and sustainability considerations have been integrated in to the plan making process.

How to comment on the report

You can tell us what you think about any part of this Sustainability Appraisal report.

Comments must be in writing and can be made in any of the following ways:

E-mail

planning@lewisham.gov.uk with 'LDF Core Strategy SA Report' as the subject.

Post

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

Appendix 1 Compliance with the SEA Directive/Regulations

This SA report incorporates the European requirements to undertake a Strategic Environmental Assessment. The following table signposts the requirements of Article 5(1) of the European Union Directive 2001/42/EC that are being met in this document, and where they were met in previous SA reports.

Summary of the SEA requirements		Where co	vered	
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	SA Report 2009 (Core Strategy Options Report)	SA report 2007 (Preferred Options)	Scoping Report 2005
a) An outline of the contents, main aims of the plan, and relationship with other relevant plans, policies, and programmes.	5	5.1	3.2	4
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	2	5.2	4.2	5
c) The environmental characteristics of areas likely to be affected.	2	5.2 6.2	4.2	5
d) Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	4	6.1	4.3	6
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan and the way those objectives and any environmental, considerations have been taken into account during its preparation.	2.1	7	4.1	7

Summary of the SEA requirements		Where co	vered	
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage, landscapes and the interrelationships between the above factors.	7	9	6.1	NA
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan	8.3	10.3	6.3 7	NA
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	7 App. 11 1.8	1.3 9.4	2 5.2 6	NA
i) A description of measures envisaged concerning monitoring in accordance with Article 10	9	11	7.2 8.2	NA
j) A non-technical summary of the information provided under the above headings	1	1	1.1	NA
The report must include the information that may reasonably be required taking (c) into account, current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)		stage will be undert consultation pe ategy Proposed Su	riod on the	

Appendix 2 Appropriate Assessment

The EU Habitats Directive⁵⁸ requires the Council to undertake an assessment⁵⁹ of the implications of a proposed plan or project on designated European sites⁶⁰. This is to ensure that the integrity of these sites are protected through the planning process. The assessment must be appropriate to its purpose under the Habitats Directive - hence the title Appropriate Assessment or AA.

In the context of the Local Development Framework (LDF), all Development Plan Documents (DPD) and Supplementary Planning Documents (SPD) are subject to the Habitats Directive and are the subject of this AA. This includes the Core Strategy.

This report has been prepared having regard to draft guidance issued by the Department for Communities and Local Government⁶¹ on undertaking AAs⁶². This suggests the following three stage process:

- Stage 1 Assess the Likely Significant Effects (screening)
- Stage 2 Appropriate Assessment and ascertaining the effect on site integrity and
- Stage 3 Mitigation measures and alternative solutions.

This report concludes that the Core Strategy is not likely to have significant effects on designated European sites. As such, only Stage 1 (screening) is required to be undertaken and is therefore the subject of this report.

Following consultation on this AA and the Core Strategy, a further AA will need to be prepared for the draft Core Strategy, and a final AA will be prepared and submitted for examination alongside the final Core Strategy.

Stage 1 Assess the likely significant effects (Screening)

Stage 1 seeks to determine if the Core Strategy is likely to have a significant effect on any designated European site. This process will determine if subsequent stages of the AA need to be undertaken (i.e. if no likely significant effects are identified then the assessment is complete).

Identification of relevant sites

There are no designated European sites within the London Borough of Lewisham. The following European sites have been identified as being with 15 km of the borough boundary and are considered to be in close enough proximity to *potentially* be impacted on and therefore necessary to be considered as pat of the AA.

⁵⁸ Council Directive 92/43/EEC on Conservation of Natural Habitats and of Wild Fauna and Flora

bounds 21 51 22 3 11 2

to be undertaken for all LDF documents

60 European sites are classified as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Sites (OMS)

⁶¹ Planning for the Protection of European Site: Appropriate Assessment, DCLG (August 2006)

⁶² This AA has also had been prepared having regard to the Appropriate Assessment undertaken for the Draft Further Alterations to the London Plan (Sept 06) prepared by Forum for the Future

Designated European Sites within 15 km of LB Lewisham⁶³

Site Name	Site Designation	Site Ref. No
Lee Valley	Special Protection Area	UK9012111
Richmond Park	Special Areas of Conservation	UK0030246
Wimbledon Common	Special Areas of Conservation	UK0030301
Epping Forest	Special Areas of Conservation	UK0012720

Site descriptions and characteristics

Appendix 2 provides a detailed overview of each designated site, including their characteristics, qualifying habitats / species, and vulnerability. This information highlights the importance of the Lee Valley and Epping Forest sites for their habitats of Atlantic acidophilous beech forests but also the vulnerability of these sites from pollution. All sites are of importance for their species of Stag beetle - *Lucanus cervus* - whilst Richmond Park and Wimbledon Common were highlighted as being in urbanised areas and vulnerable to recreational pressures.

Other plans and projects - key trends and directions

In considering the likely significant effects of the Core Strategy on designated European sites, the cumulative impact of other plans and projects in addition to the Core Strategy need to be considered.

The plans and projects of all other London boroughs (in particular, their LDFs) are all relevant but in practise the London Plan, as the overriding Regional Spatial Strategy for London, encompasses their directions at a strategic level. Other plans and projects considered to be of potential interest such as those of Transport for London and the London Development Agency are also accommodated as part of the London Plan. As such, it is considered that the London Plan is the key plan which will be assessed along with the Core Strategy to ascertain key trends and directions for the purpose of this AA.

It is considered that for the purposes of this AA, the key overriding provision in the London Plan, and the plans and programs of other London Local Planning Authorities, is the requirement that London will accommodate an additional 305,000 additional homes between 2007/08 to 2016/17, of which Lewisham must provide 9,750.

The Sustainability Appraisal of each of the Core Strategy has explored other plans in more detail and has been used as relevant background material for this AA.

Assessment methodology used

Having ascertained the designated European sites of relevance to this AA, it is necessary to assess each strategic spatial option and the policy options contained in the Core Strategy for the likely impact (if any) they will have on the site.

⁶³ Sources:- Joint Nature Conservation Committee (<u>www.jncc.gov.uk</u>) and <u>www.magic.gov.uk</u>

This assessment has been undertaken generally in accordance with the methodology outlined in draft guidance issued by Natural England⁶⁴ but adapted where necessary. Whilst this guidance relates specifically to regional spatial strategies (e.g. the London Plan) it is considered sufficiently robust to be utilised for this AA. It is noted that the guidance defines 'likely' as meaning 'probably, not merely a fanciful possibility'.

For each option, the following tests will be used to assess the likely significant effects on each policy in the LDF documents. This will help establish if a policy will have no effect, could have an effect, or is likely to have an effect on a designated European site.

Assessment Tests⁶⁵

Re	eason why policy will have no effect on European Sites
1	The policy is not in itself lead to development (e.g. it relates to design or other
	qualitative criteria for development, or it is not a land use planning policy)
2	(Test 2 in the guidance only applies to regional spatial strategies and is
	therefore not applicable to the assessment of the Core Strategy)
3	(Test 3 in the guidance only applies to regional spatial strategies and is
	therefore not applicable to the assessment of the Core Strategy)
4	Concentration of development in urban areas will not affect European sites and
	will help steer development and land use change away from European sites
	and associated sensitive areas.
5	The policy helps to steer development away from a European site and
	associated sensitive areas.
6	The policy is intended to protect the natural environment, including biodiversity.
7	The policy is intended to conserve or enhance the natural, built or historic
	environment, and enhancement measures will not be likely to have any effect
	on a European site.
R	eason why policy could have a potential effect on European Sites
8	The document steers a quantum or type of development towards, or
	encourages development in, an area that includes a European site or an area
	where development may indirectly affect a European site.
Re	easons why policy would be likely to have a significant effect on European Sites
9	The policy makes provision for a quantum or kind of development that in the
	location(s) proposed would be likely to have a significant effect on a European
	site.

Those policies (or options) which could have an effect (as shown in 8 in Table 2.2) will need to be further considered in this scoping stage of the AA and those policies (or options) that would be likely to have a significant effect (as shown in 9 in Table 2.2) will need to be subject to Stage 2 and 3 of the AA.

The assessment tables can be found in section A3.1.

⁶⁴ The Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations (2006), Tyldesley and Associates

Adapted from the Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations (2006), Tyldesley and Associates.

Assessment Outcomes

The assessment of each policy (or option) contained in the Core Strategy has shown that the options are not expected have a potential effect and no option is expected to have a significant effect on a designated European site.

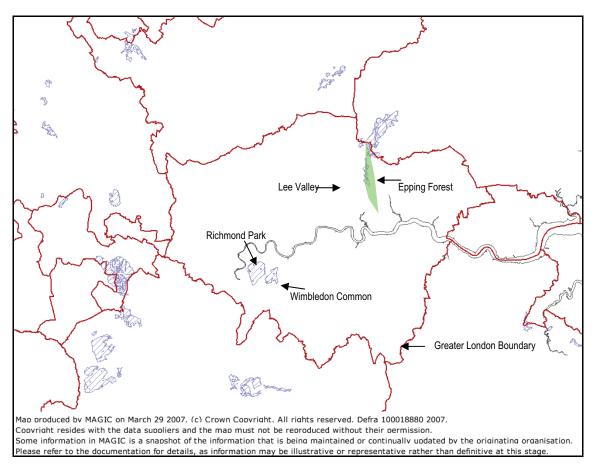
Conclusion

This report identified four European sites of interest to the AA (see Appendix 1) and the key characteristics of each site have been recorded (see Appendix 2). Further, the Core Strategy has been assessed against a standard criteria (see Appendix 3) to determine their effect on the European sites (if any).

The conclusion of this assessment is that no options have been found to have a likely significant effect on any designated European sites.

Given the above conclusion, there is no need or requirement to continue to Stage 2 or 3 of the AA. This report will be up-dated and amended (as required) following consultation on the Core Strategy and to take into account any changes which may be made to the document prior to the draft being prepared for a further round of public consultation.

Designated European Sites within 15 km of Lewisham



(Source:- part www.magic.gov.uk and part LB Lewisham)

Site Name	Site Designation	Site Ref. No
Lee Valley	Special Protection Area	UK9012111
Richmond Park	Special Areas of Conservation	UK0030246
Wimbledon Common	Special Areas of Conservation	UK0030301
Epping Forest	Special Areas of Conservation	UK0012720

Site Descriptions and Characteristics

The following are detailed site descriptions and characteristics of the four designated European sites which are considered in this report. All information is sourced from the Joint Nature Conservation Committee (www.incc.gov.uk).

Lee Valley SPA (447.87 ha)

General Site Character

- Inland water bodies (standing water, running water) (67%)
- Bogs. Marshes. Water fringed vegetation. Fens (4.0%)
- Humid grassland. Mesophile grassland (8.0%)
- Improved grassland (10.0%)
- Broad-leaved deciduous woodland (10.0%)
- Other land (including towns, villages, roads, waste places, mines, industrial sites (1.0%)

Qualifying Habitats

n/a

Qualifying Species

- Bittern Botaurus stellaris
- Gadwall Anas strepera
- Shoveler Anas clypeata

The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of manmade, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*.

Vulnerability

The whole area is affected by rather eutrophic water quality; but this is to be addressed via AMP3 funding under the Urban Waste Water Treatment Directive. The other main threat is that of human recreational pressure, but this is already well regulated though zoning of water bodies within the Lee Valley Regional Park. The majority of the site is already managed in accordance with agreed management plans in which nature conservation is a high or sole priority.

There is also a potential problem from over-extraction of surface water for public supply, particularly during periods of drought. This will be addressed through the Environment Agency review of consents. The threat from potential development pressures in this urbanised and urban-fringe area is largely covered by the relevant provisions of the Conservation Regulations (1994).

Richmond Park SAC (846.68 ha)

General Site Character

- Inland water bodies (standing water, running water) (1.5%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maquis and garrigue. Phygrana (25%)
- Dry grassland. Steppes (18%)
- Humid grassland. Mesophile grassland (5%)
- Improved grassland (20%)
- Broad-leaved deciduous woodland (25%)
- Mixed woodland (5%)

Qualifying Habitats

n/a

Qualifying Species

Stag beetle Lucanus cervus

Richmond Park has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

Vulnerability

The site is surrounded by urban area and therefore experiences high levels of recreational pressure.

Wimbledon Common SAC (348.31 ha)

General Site Character

- Inland water bodies (standing water, running water) (1%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.5%)
- Heath. Scrub. Maguis and garrigue. Phygrana (5%)
- Dry grassland. Steppes (45%)
- Improved grassland (3.5%)
- Broad-leaved deciduous woodland (45%)

Qualifying Habitats

- Northern Atlantic wet heaths with Erica tetralix
- European dry heaths

The above habitats are a qualifying feature, but not a primary reason for selection of this site.

Qualifying Species

• Stag beetle Lucanus cervus

Wimbledon Common has a large number of old trees and much fallen decaying timber. It is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*, and a relatively large number of records were received from this site during a recent nationwide survey for the species (Percy et al. 2000). The site supports a number of other scarce invertebrate species associated with decaying timber.

Vulnerability

The site is located in an urban area and therefore experiences heavy recreational pressure.

Epping Forest SAC (1,604.95 ha)

General Site Character

- Inland water bodies (standing water, running water) (6%)
- Bogs. Marshes. Water fringed vegetation. Fens (0.2%)
- Heath. Scrub. Maquis and garrigue. Phygrana (3.8%)
- Dry grassland. Steppes (20%)
- Broad-leaved deciduous woodland (70%)

Qualifying Habitats

 Atlantic acidophilous beech forests with llex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion)

Epping Forest represents Atlantic acidophilous beech forests in the north-eastern part of the habitat's UK range. Although the epiphytes at this site have declined, largely as a result of air pollution, it remains important for a range of rare species, including the moss *Zygodon forsteri*. The long history of pollarding, and resultant large number of veteran trees, ensures that the site is also rich in fungi and dead-wood invertebrates.

- Northern Atlantic wet heaths with Erica tetralix
- European dry heaths

The above habitats are a qualifying feature, but not a primary reason for selection of this site.

Qualifying Species

Stag beetle Lucanus cervus

Epping Forest is a large woodland area in which records of stag beetle *Lucanus cervus* are widespread and frequent; the site straddles the Essex and east London population centres. Epping Forest is a very important site for fauna associated with decaying timber, and supports many Red Data Book and Nationally Scarce invertebrate species.

Vulnerability

After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995. The forest's epiphytic bryophyte population had been declining due to the death of pollards, shading and

pollution from acid rain. The reintroduction of pollarding and wood pasture management is helping to reverse the decline.

The slow recovery can also be attributed to the reduction of atmospheric pollutants since the passing of the 1956 Clean Air Act.

There is an active policy to leave felled timber on the ground to increase the habitat for stag beetle and other saproxylic insects.

In 1988, the Corporation of London, who own and manage the forest, agreed a management strategy with English Nature to take forward the management outlined above. A comprehensive management plan was completed and consented in 1998.

The site is subject to the provisions of the Epping Forest Act of 1878.

Assessment tables

The following tables provide an assessment of each policy contained in the LDF documents according to the tests and methodology outlined in Section 2.4 of this report.

Assessment tests⁶⁶

Reason why policy will have no effect on European Sites The policy will not itself lead to development (e.g. it relates to design or other qualitative criteria for development, or it is not a land use planning policy) (Only applies to regional spatial strategies and is therefore not applicable to the assessment of the LDF documents) 3 (Only applies to regional spatial strategies and is therefore not applicable to the assessment of the LDF documents) Concentration of development in urban areas will not affect European sites and will help steer development and land use change away from European sites and associated sensitive areas. The policy will help to steer development away from a European site and associated sensitive areas. 6 The policy is intended to protect the natural environment, including biodiversity. The policy is intended to conserve or enhance the natural, built or historic environment, and enhancement measures will not be likely to have any effect on a European site. Reason why policy **could** have a potential effect on European Sites The document steers development a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site. Reasons why policy would be likely to have a significant effect on European Sites The policy makes provision for a quantum or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site.

⁶⁶ Adapted from the Assessment of Regional Spatial Strategies and Sub Regional Strategies under the provisions of the Habitats Regulations (2006), Tyldesley and Associates

Core Strategy (Proposed Submission Version)

Spati	al Policy	Assessment	Impact	Recommendations
1	Lewisham Spatial Strategy	4	No	None
2	Regeneration and Growth Areas	4	No	None
3	District Hubs	4	No	None
4	Local Hubs	4	No	None
5	Areas of Stability and Managed	4	No	None
	Change			
Core	Strategy Policy	Assessment	Impacts	Recommendations
1	Housing provision, mix and affordability	4	No	None
2	Gypsies and travellers	5	No	None
3	Strategic Industrial Locations and Local Employment Locations	5	No	None
4	Mixed Use Employment Locations	5	No	None
5	Other employment locations including creative industries	5	No	None
6	Retail hierarchy and location of retail development	5	No	None
7	Climate change and adapting to the effects	1	No	None
8	Sustainable design and construction and energy efficiency	1	No	None
9	Improving local air quality	7	No	None
10	Managing and mitigating the risk of flooding	7	No	None
11	River and waterways network	7	No	None
12	Open space and environmental assets	7	No	None
13	Addressing Lewisham's waste management requirements	5	No	None
14	Sustainable movement and transport	1	No	None
15	High quality design for Lewisham	1	No	None
16	Conservation Areas, Heritage Assets and the historic Environment	7	No	None
17	The Protected Vistas, the London Panorama and local views, landmarks and panoramas	1	No	None
18	The location and design of tall buildings	1	No	None
19	Provision and maintenance of community and recreational facilities	1	No	None
20	Delivering educational achievements, healthcare provision and promoting healthy lifestyles	1	No	None
21	Planning obligations	1	No	None
. 1	egic Site Allocation	Assessment	Impacts	Recommendations
1	Requirements for strategic site allocations	5	No	None
2	Convoys Wharf	5	No	None
3	Surrey Canal Triangle	5	No	None
4	Oxestalls Road	5	No	None
5	Plough Way	5	No	None
6	Lewisham Gateway	5	No	None

Appendix 3 Compatibility matrix of SA objectives

- Compatible Not compatible Χ
- Neutral

SA Objectives	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
1. Economic										√	1	√	1		1	√			
growth																			
2. Employment		Х	Х	0	Х		Х			Χ	0	Χ	Χ			0			
3.Waste		Х	V					0		0	V	0	Х	0	0	0	0		0
4. Natural		Х	V							V	0	0	Х	0	0	0	0	0	0
resources																			
5. Open spaces		Χ			Х		7	7		~	\forall	0	Χ	~	0	0	0		
6. Biodiversity		Х			Χ							0	Χ		0	0	0		
7. Air quality,		Х								0					0	0	0		0
noise and																			
vibration				<u> </u>															
8. Sustainable															0	0	0		
transport			ļ ,	ļ.,	,						,							,	
9. Climate		X											Х		0	0	0		0
change			,	ļ.,	ļ.,		,	,	,									,	
10. Flood risk	1	Х	√		√		√,	V	√	V	√	√	Χ	1	0	0	0	√	0
11. Landscapes		0		0			V			0			0		0	0	0		0
and townscapes	,		ļ.,		,		,	,	,		,	,						ļ.,	
12. Historic		0		0						0			0		0	0	0		0
environment																			
and																			
archaeological																			
aspects							-	-				.,	-	,	-		,		
13. Housing	√	X	X	0	X		1	1	X	X	0	X	V	1	V	0	√	√	0
14. Health and													V		V	0	0		
well-being	,	,							_	_		_	1	,	-	,	,	,	,
15. Deprivation			0	0	0		0	0	0	0	0	0	V	V	V				
and social																			
inclusion	V	V	0	0	0		0	0	0	0	0	0	0	√	V	V	1	V	V
16. Education, skills and	V	٧	U	U	U		U	U	U	U	U	U	U	V	V	V	V	٧	V
training																			
17. Safety and			0	0	0		0	0	0	0	0	0	0	V	V	V		V	0
anti-social	V	٧	0	0	١٠		U	U	U	U		0	U	V	, v	V	V	V	U
behaviour																			
18. Community	1	V	0	0	0		0	V	0	0	0	V	V	V	V	V		V	V
identity and	`	,						•				,	`	,	· '	,	,	•	'
welfare																			
19. Leisure				0	0		0	V	0	0	0	0	V	V			V		V
facilities,	'	'	'					'					'	,	'		'	,	'
infrastructure																			
and local																			
services																			
		1	L	1	!	L			L		L	1	1		!	1	1	L	

Appendix 4 Appraisal of the Core Strategy strategic objectives

++	Likely to have very positive impact
+	Likely to have positive impact
	Likely to have very negative impact
-	Likely to have negative impact
I	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

Sectorial Crop								Susta	ainab	ility (Sustainability Objectives	ives						
Strategic Objectives	l evitoejdo AS	S evitoejdo AS	S evitoejdo AS	SA objective 4	S evitoejdo AS	8 AVibəldo AS	SA objective 7	8 evitoejdo AS	9 evitoejdo AS	SA objective 10	SA objective 11	SA objective 12 SA objective 13	SA objective 14	SA Objective 15	SA Objective 16	SA Objective 17	Sh Objective 18	9h Objective 19
Regeneration and growth areas														-		-	-	
Physical and socio-economic benefits	‡	++	-	_	_	_	l/-	_	_	_	_	_	+	++	0	+/0	+	_
Providing new homes																		
Housing provision and distribution	+		0/-	_	0/-	0/-	0/-	_	<u> </u>	_	_	+	+	+	0	0/+	+	0
Local housing need	+		0,	-	0/-	0/-	0/-	-	-	_	_	+	+	+	0	0/+	+	0
Growing the local economy																		
Economic activity and local businesses	‡	+	0	0	-/¿	-/¿	0	0	0	0	0	0 -/0	+	+	0	+	+	٥/5
Environmental management																		
Climate change	+	0	‡	‡	‡	† +	‡	† +	+	++	0 0	0 +/0	‡	0	0	0	0	0
Flood risk reduction and water management	0/+	0	0/+	0	0	0	0	0	++	++	·+ 0	0 0/+	+	0	0	0	0/+	0
Open spaces and environmental assets	+	1	0/+	0/+	‡	‡	0/+	0	+	0/+	+	+	‡	0	0	0	+	0/+
Waste management	-/+	٠	+	‡	0/+	0/+	0	0	+	0	ر (0	0/+	0	0	0	0/+	0/+
Building a sustainable community																		
Transport and accessibility	++	+	0	++	+	+	-/+	++	++	+	+	0 +	++	0	0	0	0	++
Community well being	+	-/+	•	1/-	-/I	-/I	1/0	1/0	l/-		0	0/- 0	++ 0	+	+	+	‡	++
Protect and enhance Lewisham's character	0	0	0	0	+	+	+	0	0	0	+ + + +	0 +	+	0	0	0	0/+	0
				1														

Appendix 5 Appraisal of Lewisham Spatial Strategy

++	Likely to have very positive impact
+	Likely to have positive impact
	Likely to have very negative impact
-	Likely to have negative impact
	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

Lewisham Spatial Strategy

SA Objectives	Lewisham	m Spatial Strategy
	Performance	Commentary
To encourage sustained economic growth	‡	Likely to promote sustained economic growth by attracting further investment. Employment focussed on economic growth sectors suitable to the borough as identified in the Employment Land Study 2008. Proposals for mixed use employment development and the associated provision of job opportunities, housing and other infrastructure facilities will improve economic conditions particularly in Deptford and New Cross. The retention throughout the borough of existing locally significant employment locations will encourage sustainable economic growth as will retail growth in designated town centres.
To encourage and promote employment and new enterprises in Lewisham	‡	Likely to generate an increase in job and training opportunities as employment is focussed in growth areas such as business support. This option has the potential to contribute up to 100,000 sq.m. of business employment equal to approximately 6,000 additional jobs in this sector, as identified in the Employment Land Study 2008. The provision of new job and training opportunities will open up new opportunities for the local population, particularly important in areas of high deprivation. Retail growth will contribute to employment.
To minimise the production of waste and increase waste recovery and recycling	+/-	There is a possibility of an increase in waste generation with an increase in population and associated development. The local waste strategy of reduce, reuse and recycle will have an impact and is designed to improve the amount of waste recycled. The strategy will safeguard sufficient sites to process the boroughs waste and deal with the proportion outlined in the London Plan (323,000 tonnes by 2020). It will also make sure that sustainable construction techniques are in place. The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP.
To ensure the efficient use of natural resources	_	Population pressures and regeneration plans will put pressure on the existing reserve of natural resources such as land, water, fuel etc. However, this option relies on the reuse of brownfield sites and locates higher density homes in areas with good public transport. It also requires the efficient use of natural resources at the operation and construction phase of development and the use of energy efficient and renewable technology as part of any development.
To maintain and enhance open space, biodiversity, flora and fauna	-/+	This option proposes to safeguard existing open space and improve its quality as well as increasing the amount of open space in the borough through on-site provision at large redevelopment sites. Proposals to naturalise the river Ravensbourne will be achieved. The inclusion of 'living roofs and walls' and landscaping in new development will enhance biodiversity. However, threats may arise through population growth and development pressures, particularly on derelict or vacant sites.

SA Objectives	Lewisham	Lewisham Spatial Strategy
	Performance	Commentary
To improve air quality and reduce noise and vibration		Increase in population and other regeneration activities will put additional pressures on existing air and noise quality in the borough. Large development sites are located with an AQMA. Construction activities may create some nuisance to neighbours. However, this option does involve unneighbourly uses being relocated to improve the quality of adjacent residential areas.
To reduce car travel and improve accessibility by sustainable modes of transport	‡	Wider regeneration opportunities through mixed use employment development provide the potential to improve PTALs in the Evelyn ward. Accessibility will be improved through better pedestrian and cyclists connections reducing severance in Evelyn and New Cross wards. Reduced car parking in residential development can be promoted in areas with higher PTALs.
To mitigate and adapt to the impact of climate change	-/+	Reduction in the use of cars and proposals to improve the public transport infrastructure will contribute positively to the climate change agenda. However, the growth pressures are likely to negatively influence natural resources. Redevelopment in areas liable to flood is also an issue addressed in the SFRA (see below). The quantum of residential development, particularly in the New Cross and Evelyn wards presents the opportunity for a waste to energy scheme provided by SELCHP.
To minimise and mitigate flood risk	_	The Strategic Flood Risk Assessment identifies some of the mixed use employment development sites as being located within Flood Zone 3A. This means a high probability of flooding and development may only be considered following application of the Sequential Test required by PPS 25. Having applied the sequential test these sites are considered acceptable for redevelopment. However, there will be a need for mitigation as part of the detailed design of individual buildings. It should also be recognised that these sites are protected by the Thames Barrier from flood risk. Policies will also reduce the amount of hard surfaces by requiring the provision of gardens, green roofs, SUDS etc.
To maintain and enhance landscapes and townscapes	‡	New development is likely to bring positive changes in the existing townscape and landscape of the borough. New buildings and surrounding spaces will raise the overall standard of design, environmental quality and improve permeability and accessibility in the whole borough but particularly in Evelyn and New Cross wards. Development will contribute to solving the problems of physical severance caused by railway viaducts and increase connectivity of these sites with the rest of the borough.
To conserve and where appropriate enhance the historic environment and other archaeological aspects of the borough	+	New development will be required to enhance and compliment the existing historic and archaeological aspects of the borough, having regard to character appraisals. Detailed policies will be set out to achieve this.

SA Objectives	Lewisham	Lewisham Spatial Strategy
	Performance	Commentary
To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home	‡	This option makes substantial housing provision over the plan period. If all sites are implemented this could exceed the London Plan target by 40%. There is an identified need in the Strategic Housing Market Assessment for more homes which would be substantially met.
To improve the health and well being of the population	‡	This option makes provision for more houses, jobs and social infrastructure facilities in areas of high deprivation. These aspects contribute towards good health and should make a positive impact on the well-being of residents. The protection of open spaces and improving leisure facilities will also contribute positively to the health of residents.
To reduce poverty and promote social inclusion	‡	The provision of more jobs, homes and improving the quality and providing infrastructure will contribute positively to the reduction of poverty and help increase social cohesion in the borough. This option particularly targets the Evelyn and New Cross wads which have the highest levels of deprivation in the borough.
To provide for the improvement of education and skill levels	+	Other regeneration programmes such as the Building Schools for the Future' will contribute towards this goal by improving or rebuilding all secondary schools in the borough. Promoting training opportunities with mixed use employment sites will also contribute to this objective.
To reduce crime, anti-social behaviour and the fear of crime	‡	The place making agenda that is central to this option will require all new developments to take account of safer by design principles. It is anticipated that new homes and a greatly improved physical environment will contribute to a reduction in crime. The provision of more jobs, housing and other economic opportunities in areas that are highly deprived such as the New Cross or Evelyn wards is also expected to make a positive contribution to achieving this objective.
To encourage a sense of community identity and welfare	+	New development will contribute towards creating a sense of place, and local community identity.
To improve accessibility to leisure facilities, community infrastructure and key local services	+	A key objective of this option is that the social infrastructure including schools, health and leisure facilities are provided along side the new homes. It also sets out to improve the status of the Lewisham Town Centre to that of metropolitan. This will involve new shops, leisure and other community facilities. Mixed use employment sites will address severance issues in the north of the borough.
Summary	Strong posit borough. Op severance ir places and i resources w	Strong positive impacts for the economic and social objectives resulting in improvements to the north of the borough. Options 1 sees a 40% increase over London Plan housing requirements, reduces physical severance in the Evelyn and New Cross Wards and has the potential to improve PTALs, and creates 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.

1	Core Strategy Spatial Policies								S	UST	AINA	SUSTAINABILITY OBJECTIVES	<u></u>	BJE(TIVE	S					
+ + + + + + + + + + + + + + + + + + +	Housing	-	2	က	4	5	9	7	∞	6	10						16	17	8	19	Comments
+ + + + + + + + + + + + + + + + + + +	Spatial Policy 1																	-			
+ + + + + + + + + + + + + + + + + + +	Lewisham Spatial Strategy	‡	‡	I/-	1/+	i/+	+	1/-	‡		_	‡	_					‡	+	+	
+ + + + + + + + + + + + + + + + + + +	Spatial Policy 2																				
+ + + + + + + + + + + + + + + + + + +	Regeneration and growth areas	‡	‡	7		+			+	_	-							‡	+	‡	
+ + + + + + + + + + + + + + + + + + +	Spatial Policy 3																				
0 0/+ + + + + + + + + + +	District Hubs	+	+	1/-	_	0	0	+/-	‡	0							+	+	+	‡	
0 0/+ + + + + + + + + + +	Spatial Policy 4																				
+ ++ + + + + +/0 1 0/- 0 + ++ 1 1/- + + +	Local Hubs	+	+	1/-	_	0	0	+	‡	_				<u> </u>			0	+	+	+	
+ ++ + + + ++ +/0 1 0/- 0 + ++ + 1 1/- + +	Spatial Policy 5																				
	Areas of stability and managed change	+	+	-	_	‡	+	0	0/-	_			<u>+</u>				+	+	+	+	
+ + + + +	Cumulative effects	+	+	I/-	-	+	-		 /+		_	+	1/+	+	+	+	+	+	+	+	

Appendix 6 Appraisal of the cross cutting and thematic policies

++	Likely to have very positive impact
+	Likely to have positive impact
	Likely to have very negative impact
-	Likely to have negative impact
Į.	Depends upon implementation
0	Neutral impact identified
?	Unknown impact

Core Strategy Policies										(U	SUST	AINA	BILIT	SUSTAINABILITY OBJECTIVES	JEC	TIVE	S		
Housing	1	2	ဗ	4	2	9	7	8	6	10	1	12 1	13 1	14 15		16 17	18	19	Comments
CS Policy 1																			Positive sustainability impacts in terms of
																			providing a range of housing across the borough and also in terms of tackling social exclusion by meeting the housing needs of various groups.
Housing provision, mix and affordability	0	0	0/1	_	ı	_	<u>-</u>	_	_		_	+	+ + + + + + + + + + + + + + + + + + + +	+	0	+	<u> -</u>	0	Housing provision will place pressure on existing local infrastructure (schools, hospitals etc) arising from increased population growth. Other aspects each as use of patiral resources flood risk
																			impact on climate change - depends upon implementation. There could be some temporarily pollution nuisance during the construction phase.
CS Policy 2																			
Gypsies and travellers	†	0	0	0	0	0	0	0	_	_	/0	0	-/+ 0	+	0	0	+	0	Allocating a site/s for gypsies and travellers likely to meet housing needs but its implementation is subject to meeting criteria listed in the policy. The requirements set out within the policy for new sites and pitches will have a number of positive sustainability impacts, including ensuring access to public transport and facilities, respecting the amenity of neighbouring properties and protecting existing habitats and biodiversity. Conflicts may arise.
Cumulative effects	+/-	0/-	0/1	0/1	0/-	0/+	I/0	0/1			_	0/1	+	+	0	0/+	0/+	1/0	

	11 12 13 14 15 16 17 18 19 Comments		Positive sustainability impacts to the local economy by providing jobs and retaining economic activity within borough. This will help reduce the need to travel for shopping and retail purposes. Positive contribution to ensuring retail services protected throughout the borough to ensure day to day needs are provided. However some negative impacts on natural/physical environment by generating waste and consuming resources.	
	19		<u> </u>	+
	18		+	+
IVES	17		+	+
ECT	16		0	0
ОВЛ	15		+	+
SUSTAINABILITY OBJECTIVES	41		+	+
VABI	13		-/0	0
TAII	12		-	_
SUS	7		-	_
	10		-	_
	6		1/-	-
	œ		V-	-
	7			l/-
	9		-	-
	S		-	_
	4		1	-
	ო			-
	2		‡	‡
	_		+	+
Core Strategy Policies	Retail and town centres	CS Policy 6	Retail hierarchy and location of retail development	Cumulative effects

Core Strategy Policies											SUS	SUSTAINABILITY OBJECTIVES	ABIL	ITY	BJE	CTIV	ÆS			
Climate change	-	2	က	4	5	9	7	∞	6	10	-	12	13	4	15	16	17	18	19 Comments	
CS Policy 7																				
Climate change and adapting to the effects	+	I/-	+	+	+	+	+	‡	‡	‡	0	0		+	0	0	0	0	Positive sustainability impacts if implemented effectively. It will help reduce CO ₂ emissions and flooding, promotes the role of open spaces and improvements to local air quality.	Iplemented emissions and spaces and
CS Policy 8																				
Sustainable design and construction and energy efficiency	· ·	/ ₊	+	+	+	+	+	0	‡	<u> </u>	-/0			+	0	0	0	0	Positive impacts if implemented effectively, will help in improving design, construction and life of buildings through the Code for Sustainable Homes and BREEAM standards. Environmental performance will be improved and carbon emissions from buildings reduced. Negative impacts in terms of housing provision, economic growth and the protection of the historic environment as higher environmental standards often restrict opportunities for growth and development by placing greater restrictions on what types of development are feasible and permissible. Similarly, the incorporation of renewable energy technologies within existing buildings can often be at the detriment of the protected historic environment. These negative effects can however be mitigated against by using viability assessments to determine whether expectations in relation to higher environmental standards for particular schemes (taking into account other constraints) are reasonable. Also, energy efficient measures can be introduced without compromising the intrinsic value of listed buildings through a careful process of understanding the building, its capacity for adaptation and use of imaginative solutions.	fectively, will tion and life of stainable carbon ing provision, on of the ironmental es for growth er restrictions feasible and ation of thin existing nent of the ese negative against by armine whether invironmental taking into sonable. Also, introduced value of listed s of solutions.
CS Policy 9																				
Local air quality	+	1/+	+	‡	/+	/+	+	0	0	0	0	‡		+	0	0	0	0	Positive impacts on health and economic activity. Implementation crucial.	onomic activity.
Cumulative effects	+	-	+	+	+	+	+	‡	+ +	++	0	0		+	0	0	0	0	0	

Core Strategy Policies										S	UST	AINA	SUSTAINABILITY OBJECTIVES	ΓY 0Ι	вЈЕС	;TIVE	S		
Waterways and flooding	1	2	3	4	2	9	7	8	6	10	11	12	13	41	15	16	17	18 1	19 Comments
CS Policy 10																			
Managing and reducing the risk of flooding	+	_	0/+	+	+	+	0	0	‡	+	0	+	_	+	0	0	0	0 +	If implemented effectively then likely to reduce the risk of flooding. It will also contribute to sustainable economic growth and reducing the risk to the built environment and the community. SUDS is a positive implementation mechanism. Could have indirect benefits such as improving use of natural resources especially water, and enhancing biodiversity. Should include 'living roofs and walls'.
CS Policy 11																			
River and waterways network	0/+	-	0	+/0	‡	‡	+	0	0/+	+	+	+	_	‡	0/+	0	+	+/0 +	Contributes to reducing and managing the risk of flooding. Improving river frontages likely to have a positive impact on the quality of life and natural and physical environment of the borough. Leisure and recreational use can promote community interaction, health and well being. More activity and accessibility in and around the borough likely to reduce fear of crime. Should include improvements to the management of water quality.
Cumulative effects	+	_	0	+	+	+	+/0	0	+	+	0/+	+	_	+	0	0	+/0	0 +	

Core Strategy Policies										SUS	STAIR	SUSTAINABILITY OBJECTIVES	LITY	OBJ	ECTI	VES			
Open space and biodiversity	-	7	က	4	2	9	2	8	10	7	12	13	4	15	16	17	18	19	Comments/Any recommended changes
CS Policy 12					-	-													
Open space and environmental assets	0	_	0	0	‡ ‡	0/+	0	+	+/0	+	0	_	+	+/0	0	0	+	+	Positive sustainability impacts, particularly in terms of protecting existing habitats and contributing to biodiversity. This policy would also help to promote healthy communities by retaining space for leisure pursuits, which would also help to facilitate social cohesion. Open spaces can help in mitigate climate change and improve air quality. Could have some conflicts with other land uses such as employment or housing due to limited land availability. With increasing population growth, there is a pressure on existing open spaces and per capita of open space needs to be monitored. Mitigation measures can include providing open space onsite for larger developments and improving connectivity through large sites, particularly in Deptford and New Cross.
Cumulative effects	0	_	0	+ 0	‡	0/+ +	0 0	+	+/0	+	0	_	+	+/0	0	0	+	+	

Core Strategy Policies										(V)	SUST	SUSTAINABILITY OBJECTIVES	\BILI	TY O	BJE	CTIV	ES				
Waste	1	2 3	3	4	2		9	7	80	6	10	1	12	13	41	15	16	17	18 Comr	10 11 12 13 14 15 16 17 18 Comments/Any recommended changes	(0
CS Policy 13																					
Addressing Lewisham's waste management requirements	0//+		‡	+	-/+	-/+	-/+	0	+	+/0	_	0	0	+	0	0	0	+	Positive chang chang and mand manage proper other manage cocup	Positive on natural resources and climate change by implementing the waste hierarchy and minimising landfill. Important that existing and new waste management sites are managed properly so to reduce environmental impacts. Other policies need to ensure waste is managed from demolition, construction and occupation of development.	рө
Cumulative effects	0//+		‡	-/+ +	-/+	-/+	-/+	0	+	+/0	_	0	0	+	0	0	0	+	0/+		

	19 Comments/Any recommended changes		Positive sustainability impacts, particularly in terms of reducing reliance on private motorised transport and the associated benefit that this would have on air quality and healthy communities. The promotion of public transport would also help to tackle social exclusion by providing a transportation option which is accessible to all. Accessibility improvements will help to contribute to economic growth. The movement of freight will be reliant on implementation to reduce negative impacts on river quality and local air quality.	
	19		0/+	+
	18		+	+
VES	11 12 13 14 15 16 17 18		0	-/0
SUSTAINABILITY OBJECTIVES	16		0	0
OBJ	15		0	0
LITY	4		+	0/+
IABI	13		0	0
STAII	12		+/0	0
SUS			0	0
	10		+	+/¿
	6		<u>‡</u>	+/¿
	∞		‡	+
	7		+	+
	9		+	خ
	Ŋ		+	خ
	4		+/0	+/0
	က		0	0
	7		+	+
	_		+	+
Core Strategy Policies	Sustainable movement	CS Policy 14	Sustainable movement and transport	Cumulative effects

Core Strategy Policies										נט	SUST	AINA	BILI	SUSTAINABILITY OBJECTIVES	вјес	TIVI	<u> </u>		
High quality design for Lewisham	-	2	3	4	2	9	7	80	6	10	11	12	13	14	15 '	16	17 1	18	19 Comments/Any recommended changes
CS Policy 15																			
High quality design for Lewisham	+	0	0	-/1	_		_	I/+	_	_	‡	<u>‡</u>	0) +/0	0	0	0	0/+	Positive impacts Likely to enhance the townscape and character of the borough. Likely to contribute to community wellbeing. Objectives such as open space, biodiversity, climate change, flooding and transport are dependent on effective design and implementation.
CS Policy 16																			
Conservation Areas, Historic Assets ad the Historic Environment	+	0	0	-/1	_		_	l/+	_	_	‡	‡	0 0	0 +/0	0	0		0 0/+	Will contribute to maintaining or enhancing the historic environment and other archaeological aspects of the borough.
CS Policy 17																			
Strategic and local views, landmarks and panoramas	+	-/0	0	-/1	0/+		0	0	0	0	‡	0 0/+	-/0) +) +/0	0	0	+	0/+ Contributes to local and regional identity.
CS Policy 18																			
The location and design of tall buildings	+	+	_	-/+	_		-/I	+	_	_	_	_	0/1	+/-	_	0	·	0/+	Criteria based policy will ensure appropriate locations for tall buildings contributing to townscape character. Rooftops should be used to promote living roofs. Micro climate and issues of overshadowing must be taken into account in the design of such buildings.
Cumulative effects	+	0/+	0	_	_		_			_	+	+	0 1/0	/0 +/0) +/0	0	0	0 0/+	+/0

Core Strategy Policies											SUST	LAIN,	SUSTAINABILITY OBJECTIVES	ITY C	BJE	CTIV	ĒS			
Community services	-	7	က	4	r.	9	7	ω	6	10	7	12	13	41	15	16	17	8	19	Comments/Any recommended changes
CS Policy 19																				
Provision and maintenance of community and recreational facilities	+	-/0	_	_	+	+	-/+	+	_	_	0/1	0	-/0	‡	+/0	‡	+	‡	‡	Generally positive impact on sustainability objectives in terms of the retention and development of key community services. Contributes to well being and social cohesion. Flood risk and climate change are based upon how and where the policy would be implemented.
CS Policy 19																				
Delivering educational achievements, healthcare provision and healthy	+	+	-/0	l/-	_	-	-/0	0	0	0	0	0	0	‡	+	‡	+	+	+	Education Positive contributions to economic objectives and community wellbeing to improve education, training and skills to address deprivation issues and working with partners. Health Positive impact on the health and wellbeing of residents and will help in addressing future needs. Focuses on addressing deprivation issues to reduce health inequalities and working with partners.
Cumulative effects	+	+	_	I/ -	_	_	-/+	1/+	_	_	0	0	0	+	+	+	+	+	+	

	11 12 13 14 15 16 17 18 19 Comments/Any recommended changes		Identified as a mechanism to secure improvements to compensate for the impacts resulting from development and can be used for the provision of a range of physical, social, green infrastructure including affordable housing, energy efficiency measures, environmental or transport improvements. It will have a positive impact on most of the SA objectives provided it is implemented effectively. Trade-off is possible.	
	19		+	+
			0/+	0/+ 0
IVES	17		0	0
ECT	16		+	+
SUSTAINABILITY OBJECTIVES	15		+	+
	14		0	0
	13		0	0
	12		+/0	0 +/0 0/+
			0/+	0/+
	10		+	+
	6		+	+
	œ		+	+
	7		+	+
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	S		+	+
	4		+	+
	က		+	+
	7		0	0
	_		0	0
Core Strategy Policies	Planning obligations	CS Policy 21	Planning Obligations	Cumulative effect

Appendix 7 Assessment of the Strategic Site Allocations

++	Likely to have very positive impact		
+	Likely to have positive impact		
	Likely to have very negative impact		
-	Likely to have negative impact		
I	Depends upon implementation		
0	Neutral impact identified		
?	Unknown impact		

	Comments	provide more local facilities, and add to a sense of community identity through the creation of 'a new place'.	This is a very varied sites with a number of different industrial and office uses. Much of the central part of the site is in very low density and low quality uses that have not received investment over many years such as haulage businesses and timber yards. There is also a recent vacant site from the demolition of a large factory warehouse building, a relatively large low rise office block and a former laundry building converted into a business centre with small office suites and storage units. Economic Objectives Redevelopment of the site for a mix of uses is likely to result in the re-provision of the business centre in more suitable premises and to create a greater mix of businesses capable of using the site, thereby encouraging growth a and the location of new enterprises within	Lewisham. Any negative
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	17		<u> </u>	
	16		+	
VES	15		+	
SUSTAINABILITY OBJECTIVES	4		+	
OBJ	5.		<u>‡</u>	
ILITY	12		+	
NABI	7		‡	
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Core Strategy	Strategic Site Allocations		Plough Way ++ ++	

Core Strategy									SUS	SUSTAINABILITY OBJECTIVES	IABIL	ΣI	OBJI	ECTI	VES					
Strategic Site Allocations	-	7	က	4	rc	9	7	ω	6	10	7	12	£	4	15	91	17	8	19	Comments
																				development which will help to open up the site and create a new attractive place that can be used and where people will feel safe rather than isolated and not overlooked. The landscape will be enhanced by proposals to re-open the Canal. Social Objectives This site allocation will have positive effects on the provision of housing, and across the social indicators. The new development is likely to strongly promote reduction in the fear of crime, encouraging a sense of community identity and participation through a new development will add focus
								\exists	\dashv								-	-		area.
Strategic Site Allocation 6	Alloca	tion 6																		
Lewisham Gateway	‡	‡		+,	+	+	-/+	‡	- -	-/+	<u></u>	+	‡	+	+	0/+	±	<u> </u>	‡	Economic Objectives This site centred around the Lewisham rail and DLR stations will release new land for development through the reconfiguration of the roundabout into a more compact road layout releasing land for development for new retail and business premises.
									_											Effects on the economy and

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Core Strategy								-,	SUST	AINA	BILI	ΓY OΕ	3JEC.	SUSTAINABILITY OBJECTIVES	40				
Strategic Site Allocations	_	7	က	4	5	9	7	∞	ი	10 1		2 13	14	15	16	17	18	19	10 11 12 13 14 15 16 17 18 19 Comments
																			could result in a
																			dramatic improvement
																			in levels of deprivation
																			and a step change in
																			the environmental and
																			social quality of the
																			area.

Appendix 8 Cumulative effects of the policy options

Key to Symbols

++	Likely to have very positive impact
7 +	Likely to have positive impact
	Likely to have very negative impact
7 -	Likely to have negative impact
_	Depends upon implementation
0	Neutral impact identified
∩ ¿	Unknown impact

SA Objectives Core Strategy Policies	1	2	3	4	2	9	7	∞	6	10	11	12	13	14	15	16	17	18	19
Housing	+/-	0/-	0/I	0/1	0/-	0/-	1/0	0/I	_	_	_	0/1	+	+	+	0	0/+	0/+	1/0
Employment land	+	+		ن	I/ -	I/ -	/-	-/+	_	_	_	_	_	+	+	_	+	+	0/+
Retail and town centres	+	++	-	-	_	_	I/ -	_	_	_	_	_	0	+	+	0	+	+	+
Climate change	+	_	+	+	+	+	+	++	++	++	0	0	_	+	0	0	0	0	0
Waterways and flooding	+	_	0	+	+	+	+/0	0	+	+	0/+	+	_	+	0	0	+/0	+	0
Open spaces	0	_	0	0	++	++	0/+	0	+	+/0	+	0	_	+	+/0	0	0	+	+
Biodiversity	0	_	0	0	- i/+	1/+	0	+	+	+/1	0	0	+/0	0	0	0	1/0	0	+
Waste	-/+	0/-	++	+	-/+	-/+	-/+	0	+	+/0	_	0	0	+	0	0	0	+	0/+
Sustainable movement	+	+	0	+/0	¿	خ	+	+	+/¿	+/¿	0	0	0	0/+	0	0	-/0	+	+
Promoting good design	+	0/+	0	ı	_	_	_	1/+	_	_	+	+	1/0	+/0	+/0	0	0	0/+	+/0
Community services	+	+		I/ -	_	_	-/+	1/+	-	-	0	0	0	+	+	+	+	+	+
Planning obligations	0	0	+	+	+	+	+	+	+	+	0/+	+/0	0	0	+	+	0	-/0	+
Results	+	+/	-/0	_	_	_	_	 /+	+/	_	+/	1/0	_	+	0/+	0	+/0	+	+/0

Appendix 9 Monitoring framework

SOURCE OF DATA	Business rates	NOMIS Official Labour Market Statistics	Annual Monitoring Report - Core Indicator 1a & BD1				Annual Monitoring Report - Core Indicator 4a
TARGETS (IF ANY)	n/a	By 2009: 4,749	No target				No target
MONITORING YEAR/ FREQUENCY	n/a	Annually	Annually				Annually
TREND/ COMPARATOR		2004: 4,595 2006: 5,065	2005/06: Gross: B1: 1,223 m² B2: 0 m² B8: 1,717 m² Total: 2,940 m²	2006/07: Gross: B1: 3,892 m² B2: 0 m² B8: 0 m² Total: 3,892 m²	2007/08 Gross B1: 1,209 m ² B2: 1,399 m ² B8: 2,631 m ² Total: 5,239 m ²	Net B1: -5,127 m ² B2: 1,129 m ² B8: -3,616 m ² Total: -7,614 m ²	2005/06: Gross: B1(a): 1,223 m ² A1: 1,189 m ² A2: 967m ²
RESULTS	n/a	390 tion: 850 ration:	2008/09 Gross B1: 1,775 m ² B2: 0 m ² B8: 0 m ² Total: 1,775 m ²	Net B1: -114 m ² B2: -1,683 m ² B8: -1,851 m ² Total: -3,648 m ²			2008/09 Gross B1(a): 508 m² A1: 2,940 m² A2: 269 m²
INDICATORS	Annual GDP of Lewisham	The net growth in VAT registered businesses	Amount of employment floor space for B1, B2 & B8 uses				Amount of completed retail, office and leisure development
DECISION AIDING QUESTIONS	Improve business development and	enhance competitiveness? • Improve the resilience of business and the	economy? • Promote growth in key sectors? • Promote growth in key clusters?				
SUSTAINABILITY OBJECTIVE	To encourage sustained economic	growth					
OBJ. NO.	_						

SOURCE OF DATA					
TARGETS (IF ANY)					
MONITORING YEAR/ FREQUENCY					
TREND/ COMPARATOR	A3: 539 m² A4: 0 m² A5: 224 m² D2: 77 m²	Net B1(a): no data A1: -65 m² A2: 810 m² A3: -171 m² A4: -870 m² A5: 224 m² D2: 77 m²	2006/07: Gross B1(a): 3,892 m² A1: 635 m² A2: 169 m² A3: no data A4: no data A5: no data D2: 1,000 m²	Net B1(a): 3,102 m ² A1: 236 m ² A2: -390 m ² A3: -171 m ² A4: no data A5: 381 m ² D2: 885 m ²	2007/08 Gross B1(a): 665 m ² A1: 2,163 m ² A2: 500 m ²
RESULTS	A3: 716 m² A4: 0 m² A5: 243 m² D2: 803 m²	Net B1(a): 458 m ² A1: 1,263 m ² A2: 189 m ² A3: 180 m ² A4: -1,265 m ² A5: 243 m ² D2: 61 m ²			
INDICATORS					
DECISION AIDING QUESTIONS					
SUSTAINABILITY OBJECTIVE					
OBJ. SI.					

OBJ. NO.	SUSTAINABILITY OBJECTIVE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
					Net B1(a): 459 m² A1: 265 m² A2: -165 m² A3: - 623 m² A4: -70 m² A5: 381 m² D2: 5,218 m²			
			Proportion of employment in creative industries (LQ)	2006: 0.75%	2004: 0.75%	Annually	0.85	Annual Business Inquiry
2	To encourage and promote employment and new enterprises in Lewisham	Reduce unemployment overall? Reduce long-term unemployment?	Employment rate of disadvantaged groups (working age employment)	2007/08:	2004/05: 71.4%	Annually	74.8 by 2009	LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2
			Employment rate of disadvantaged groups (over 50s employment)	2007/08:	2004/05: 54.4%	Annually	59.5 by 2009	LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2
			Employment rate of disadvantaged groups (BME employment)	2007/08:	2004/05: 61.4%	Annually	64.5 by 2009	LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2
			Employment rate of disadvantaged groups (lowest qualification employment)	2007/08:	2004/05: 33.5%	Annually	45.5 by 2009	LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2
			Number of new businesses created as a result of support from business support agencies		2005/06: 72	Annually	88 by 2009	LSP Economic development and enterprise Block: 6 monthly report, Nov 2006, appendix 2
			Percentage of economically active people in Lewisham	2008/09: 79% (144,700 people) London average: 75.8%	2005: 76.4% (132,700 people) London average: 74.5%	Annually	No target	NOMIS Official Labour Market Statistics

SOURCE OF DATA		NOMIS Official Labour Market Statistics	Best Value 082a	Best Value 082b	Best Value 082c	Best Value 082d
TARGETS (IF S ANY)		No target	2005/06: 14% 2006/07: 17% 2007/08: 18% 2008/09: 23% 2009/10: 23% 2010/11: 24% 2011/12: 25%	2006/07: 1% 2007/08: 2% 2008/09: 23% (recycle, re-use or compost)	2007/08: 73% Ba	2006/07: 7% 2007/08: 7% 2008/09: 10% 2009/10: 9% 2010/11: 8%
MONITORING YEAR/ FREQUENCY		Annually	Annually	Annually	Annually	Annually
TREND/ COMPARATOR	2007: 75.7% (136,900 people) London average: 75.0% GB: 78.6%	2003: 68,787 2004: 65,259 2005: 62,800 2006: 59,700 2007: 61,500	2005/06: 11.96% 2006/07: 14.01% 2007/08: 21.41% Best Quartile 2006/07 England:22.88% London: 21.77%	2005/06: 0.24% 2006/07: 0.30% 2007/08: 0.58 % Best Quartile 2006/07 England: 15.53% London: 9.19%	2005/06: 77.75% 2006/07: 76.26% 2007/08: 73.16% Best Quartile 2006/07 England: 11.66% London: 53.09%	2005/06: 10.04% 2006/07: 9.47% 2007/08: 4.84% Best Quartile 2006/07 England: 55.63% London: 28%
RESULTS	GB: 78.9%	2008: 61,100	2008/09: 19.95%	2008/09: 0.5%	2008/09: 75.73%	2008/09: 3.72%
INDICATORS		Number of people working within Lewisham	Percentage of municipal waste recycled	Percentage of municipal waste composted	Percentage of municipal waste incinerated	Percentage of municipal waste landfilled
DECISION AIDING QUESTIONS			Lead to reduced consumption of materials and resources? Reduce household waste? Increase waste recovery and	recycling? • Reduce hazardous waste? • Reduce waste in the construction industry?		
SUSTAINABILITY OBJECTIVE			To minimise the production of waste and increase waste recovery and recycling rates			
OBJ. NO.			м			

SUSTAINABILITY OBJECTIVE	ILITY VE	DECISION AIDING QUESTIONS	INDICATORS	RESULTS	TREND/ COMPARATOR	MONITORING YEAR/ FREQUENCY	TARGETS (IF ANY)	SOURCE OF DATA
			Kg of household waste collected per head	2008/09: 451.40 kg	2005/06: 470 kg 2006/07: 469.9 kg 2007/08: 451.40 kg Best Quartile 2006/07 England:394.98 kg London: 390.60 kg	Annually	2004/05: 460 kg 2005/06: 470 kg 2006/07: 470 kg 2007/08: 451 kg	Best Value 084a
			Percentage of household waste served by recyclables kerbside collection	2008/09: 100%	2005/06: 100% 2006/07: 100% 2007/08: 100%	Annually	2006/07: 100% 2007/08: 100%	Best Value 091
1 2 0 2 2	To use and manage the consumption of natural resources in a sustainable manner	Improve the quality of river water or ground water? Conserve water? SUDS?	Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.	2008/09: 0	2005/06: 0 2006/07: 0 2007/08: 0	Annually	2006/07: 0 2007/08: 0 2008/09: 0	Annual Monitoring Report – Core Indicator 7 & E1C
			Change in biological river quality (Good) Provides an indication of the level of river health. The higher the figure indicates the more healthy the rivers are rivers over time	A and B (Good or better) Thames Region: 2008: -2.8%	A and B (Good or better) Thames Region 2001: 73.8% 2002: 75.7% 2004: 67.5% 2005: 66.2% 2006: 65.8% 2007: 64.5% 2008: 61.7%		No target	Environment Agency
_			Change in chemical river quality (Good) Provides an	A and B (Good or better) Thames Region: 2008: 3.8%			No target	Environment Agency

SOURCE OF DATA		Environment Agency	Annual Monitoring Report - Core Indicator 8
TARGETS (IF ANY)		No target	Maintain and enhance the current population of biodiversity importance
MONITORING YEAR/ FREQUENCY		Annually	
TREND/ COMPARATOR		A and B (Good or better) Thames Region 2001: 76.6% 2002: 80.5% 2003: 72.9% 2004: 77.8% 2005: 75.0% 2006: 71.5%	2005/06: (i) not currently monitored (ii) 0% change 2006/07 (i) no data (ii) Site of Metropolitan importance: 4 sites: 215.55ha Borough Importance (Grade 1): 8 sites:88.94ha (Grade 2): 32 sites:1240.3ha Local Importance: - (26 sites: 100.66ha) 2007/08: (i) no data (ii) Site of Metropolitan
RESULTS		A and B (Good or better) Thames Region: 2008: 80.1%	2008/09 (i) no data (ii) no change
INDICATORS	indication of the level of river health. The higher the figure indicates the more healthy the rivers are rivers over time	Chemical river water quality (Good) as a percentage of total river length	Changes in areas and populations of biodiversity importance, including: (i) change in priority habitats and species (by type); and (ii) change in areas designated for their intrinsic environmental value including sites of international, national, regional, or sub-regional significance
DECISION AIDING QUESTIONS			Protect existing open space? Provision and quality of open space?
SUSTAINABILITY OBJECTIVE			To protect and enhance the borough's open spaces
OBJ.			ഗ

SOURCE OF DATA		Annual Monitoring Report - Core Indicator 8
TARGETS (IF ANY)		
MONITORING YEAR/ FREQUENCY		Yearly
TREND/ COMPARATOR	importance: 0% (4 sites: 215.55ha) Borough importance (Grade 1): 0% (8 sites: 88.94ha) (Grade 2): 0.38% (33 sites: 137.44ha) Local Importance: -0.38% (25 sites: 87.25ha)	2007/08 Lowland beech and yew woodland: 0.00 ha Wet Woodland: 0.09 ha Lowland mixed deciduous woodland: 38.46 ha Traditional orchards: 0.69 ha Wood-pasture and parkland: no data available Hedgerows: 0.42 ha Coastal and floodplain grazing marsh: no data available Lowland meadows: 1.40 ha Lowland calcareous grassland: 0.00ha Lowland dry acid grassland: 40.66ha Reedbeds: 0.00ha HEONDHA
RESULTS		2008/09 No Change
INDICATORS		
DECISION AIDING QUESTIONS		Conserve and enhance natural/semi-natural habitats? Enhance river environments and water quality of local rivers? Conserve and enhance species diversity, and in particular avoid harm to protected species? Maintain and enhance sites designated for their nature conservation interest? Maintain and enhance woodland cover and management?
SUSTAINABILITY OBJECTIVE		To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna and increase peoples access to nature in all areas of the borough
OBJ. NO.		Φ

SOURCE OF DATA		To be completed	LIP Target 5	LIP Target 7	LIP Target 12	LIP Target 13	Annual Monitoring Report - Core Indicator 9/ E3	
TARGETS (IF ANY)		As per AQMA standards	Zero growth between 2001 and 2011	Maintain or increase the proportion of personal travel made by means other than the car	Increase	Increase	Target to be set in the Spatial (Core) Strategy	
MONITORING YEAR/ FREQUENCY			2003 Annually	2001 Annually	2001	2001	Annually	
TREND/ COMPARATOR	available Coastal saltmarsh: 0.03ha Intertidal mudflats: 2.55ha Rivers: 19.39 ha Eutrophic standard waters Ponds: 1.96ha Open mosaic habitats on previously developed land		1.1% increase since 2001. Growth of 5.5% by 2011 if trend continues			1991: 52,577	2007/08: No. of permission: 19 Types:	Photovoltaic Panel: 3 Solar: 11
RESULTS			910	Walk 27.8 Cycle 1.2 Car 39.9 Motorcycle 0.5 Bus 15.4 Underground/DL R 10.0 Rail 4.4 Taxi 1.4	163,617 per average day	4,481	2008/09 Completed: 4 Granted: 17	Photovoltaic Panel: 3
INDICATORS		Levels Exceeding Main Air Pollutant Quality Standards.	Traffic volume (million vehicle km)	Modal share (%)	Volume and rate of walking trips	Volume and rate of cycling trips	Renewable energy capacity installed by type	
DECISION AIDING QUESTIONS		Improve air quality?Reduce car use?Reduce vehicle movement?	 Reduce car use? Increase/enhance bicycle/walking routes? 	Proximity to public modes of transport?			Reduce greenhouse gas emissions?	Reduce energy consumption?Lead to an
SUSTAINABILITY OBJECTIVE		To improve air quality and reduce noise and vibration.	To reduce car travel and improve accessibility by sustainable modes	of transport			To mitigate, and adapt to the impact of climate change	
OBJ.		7	ω				თ	

SOURCE OF DATA		Annual Monitoring Report - Core Indicator 7	Best Value 199a	Open Space Strategy	Best Value 219b Annual Monitoring Report Local Indicator
TARGETS (IF ANY)		0	2006/07: 22% 2007/08: 21%	1.7ha by 2006 1.75ha by 2010	28%
MONITORING YEAR/ FREQUENCY		Annually	Annually		Annually
TREND/ COMPARATOR	Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures: 9	2005/06: 0 2006/07: 0 2007/08: 0	2005/06: 28.5% 2006/07: 24% Best Quartile 2006/07 England: 7% London: 14.6%		2005/06: 28% 2006/07: 36% Best Quartile 2006/07
RESULTS	Solar: 11 Wind turbine: 3 Biomass boiler: 3 Other sustainable design measures: 13 Other renewable energy measures	2008/09: 0	2007/08: 14.67%		2007/08: 42.31%
INDICATORS		Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality	The proportion of relevant land and highways that is assessed as having combined deposits of litter and detritus across four categories of cleanliness (Clean, Light, Significant, Heavy)	Open Space availability per 1,000 population	Percentage of conservation areas in the Borough with an up-to-date
DECISION AIDING QUESTIONS	increased proportion of energy needs being met from renewable sources? • Flood protection? • Sustainable design and construction?	 Is there flood protection? SUDS? Decreasing runoff? Construction practices that adapt to flooding? 	Reduce the amount of derelict, degraded and underused land? Improve the landscape and ecological quality and character? Decrease litter? Design?		Conserve and enhance the historic built character of the borough, especially within designated
SUSTAINABILITY OBJECTIVE		To reduce and manage flood risk	To maintain and enhance landscapes and townscapes		To conserve and where appropriate, enhance the historic environment and other archaeological
OBJ. NO.		0			72

SOURCE OF DATA		Best Value 219c Annual Monitoring Report Local Indicator	Annual Monitoring Report :Core H2a	Annual Monitoring Report: Core H5 & Local 4e	ONS Census 2001 Census KSO8
TARGETS (IF ANY)		2004/05: 36% 2005/06: 44% 2006/07: 52%	975 dwellings annually	140	No target Aim to reduce this number.
MONITORING YEAR/ FREQUENCY		Annually	Annually	Annually	
TREND/ COMPARATOR	England: 43.63% London: 65%		2001/02: 470 2002/03: 722 2003/04: 778 2004/05: 503 2005/06: 967 2006/07: 347	2005/06: 246 2006/07: 269 2007/08: 273 & 91 habitable rooms (off site)	2001: London: 29.65% England: 33.55%
RESULTS		Target met	2008/09: 956	2008/09: 376	2001: 31,577 (29.4%)
INDICATORS	character appraisal	Percentage of conservation areas in the Borough with management proposals	Number of Housing Completions	Number of Affordable Housing Completions	Households with a Limiting Long- Term Illness
DECISION AIDING QUESTIONS	conservation areas? • Protect sites of archaeological and historic importance?		Reduce homelessness? Increase the range and affordability of housing for all social groups?	Reduce the number on unfit homes? Reduce death rates? Improve access to high quality, health facilities? Encourage healthy lifestyles? Reduce poverty and social exclusion and health inequalities in those areas most affected? Improve affordability to essential services to the home?	Improve qualifications and skills of younger
SUSTAINABILITY OBJECTIVE	aspects of the borough		To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home		To improve the health and well-being of the
OBJ.			13		4

SOURCE OF DATA		DCLG	NOMIS Official Labour Market Statistics Census KS13	Best Value 038	Best Value - Local	Best Value 126a	Best Value 128a
TARGETS (IF ANY)		No target. Improve rank	Aim to reduce this number	2006/07: 51% 2007/08: 52.8%	2005/06: 1,600 2006/07: 1,700 2007/08: 1,700 2009/09: 1,700	2006/07: 21 2007/08: 22	2006/07: 14 2007/08: 14
MONITORING YEAR/ FREQUENCY		Every 3 year	Annually	Annually	Annually		Annually
TREND/ COMPARATOR		2004: 38	2007 Lewisham: 17,000 (9.7%) London: 12.8% GB: 13.1%	2005/06: 49% 2006/07: 54.8% Best Quartile 2006/07 England: 61.8% London: 63.23%	2003/04: 1,480 2004/05: 1,550 2005/06: 1,600	2005/06: 21.1 2006/07: 23.3 Best Quartile 2006/07 England: 5.80 London: 14.05	2005/06: 17 2006/07: 16 Best Quartile 2006/07
RESULTS		2007: rank 39 out of 354 local authorities in England	2008: 16,800 (9.5%) London: 12.0% GB:12.4%	2007/08: 54.8%	2007/08:	2007/08: 20.7	2007/08: 15.2
INDICATORS		Index of local deprivation	People Aged 16- 74 with no qualifications	Percentage of pupils achieving 5 or more GCSE's at grades A*-C or equivalent	Number of learners completing adult education basic skills programme	Domestic burglaries per 1,000 households	Vehicle crimes per 1,000 population
DECISION AIDING QUESTIONS	people? • Improve qualifications and skills of adults?	 Reduce actual levels of crime? Reduce the fear of crime? Reduce the actual noise levels? Reduce noise concerns? 	Encourage Engagement in community activities? Increase the	ability of people to influence decisions? Improve ethnic relations? Conserve and enhance the historic built character of the	borough, especially within designated conservation areas? Protect sites of archaeological and historic importance?	Reduce homelessness? Increase the range and affordability of housing for all social groups?	 Reduce the number on unfit homes? Reduce death rates?
SUSTAINABILITY OBJECTIVE	population and reduce inequalities in health	To address deprivation, promote social inclusion and ensure equitable outcomes for all communities	To provide for the improvement of education and skill levels			To enhance community safety by reducing crime, antisocial behaviour and the fear of crime	
OBJ.		15	16			17	

SOURCE OF DATA		Best Value 127	Best Value 174	Best Value 117
TARGETS (IF SANY)		2007/08: 22.9 2007/08: 22.9	No target	2005/06: 7,000 2006/07: 7,000 2007/08: 7,200 2008/09: 7,206 2009/10: 7,780
MONITORING YEAR/ FREQUENCY		Annually	Annually	Annually
TREND/ COMPARATOR	England: 7.00 London: 13.95	2005/06: 34.3 2006/07: 44.9 Best Quartile 2006/07 England: 13.1 London: 21.95	2005/06; 40.89 2006/07: 41.20	2004/05: 6,018.95 2005/06: 6,222
RESULTS		2007/08: 41.1	2007/08: 54.9	
INDICATORS		Violent crimes per 1,000 population	No of recorded racial incidents per 100,000 population	Number of physical visits to public libraries (per capita)
DECISION AIDING QUESTIONS	 Improve access to high quality, health 	facilities? • Encourage healthy lifestyles? • Reduce poverty and social exclusion and health inequalities in those areas most affected? • Improve affordability to essential services to the home? • Improve qualifications and skills of younger people? • Improve qualifications and skills of younger people?	Reduce actual levels of crime? Reduce the fear of crime? Reduce the actual noise levels? Reduce noise concerns?	Encourage engagement in community activities? Increase the ability of people to influence decisions? Improve ethnic relations?
SUSTAINABILITY OBJECTIVE			To encourage a sense of community identity, social cohesion and civic participation	To improve accessibility to leisure facilities, community infrastructure and key local services
OBJ.			ω	00

Appendix 10 Sustainability appraisal framework

The sustainability appraisal objectives are as follows:

Economic

- 1. To encourage sustained economic growth across a variety of sectors
- 2. To encourage and promote employment and new enterprises in Lewisham

Environmental

- 3. To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates
- 4. To use and manage the consumption of natural resources in a sustainable manner
- 5. To protect and enhance the borough's open spaces
- 6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna and increase peoples access to nature in all areas of the borough
- 7. To improve air quality and reduce noise and vibration
- 8. To reduce car travel and improve accessibility by sustainable modes of transport
- 9. To mitigate, and adapt to the impact of climate change
- 10. To reduce and manage flood risk
- 11. To maintain and enhance landscapes and townscapes
- 12. To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough

Social

- 13. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home
- 14. To improve the health and wellbeing of the population and reduce inequalities in health
- 15. To address deprivation promote social inclusion and ensure equitable outcomes for all communities
- 16. To provide for the improvement of education, skills and training
- 17. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime
- 18. To encourage a sense of community identity, social cohesion and civic participation
- 19. To improve accessibility to leisure facilities, community infrastructure and key local services

The decision aiding questions used to guide the sustainability appraisal process are listed in the table that follows.

SA	objective	Appraisal questions to guide the SA
1.	To encourage sustained	Improve business development and enhance competitiveness?
	economic growth across a variety	Improve the resilience of business and the economy?
	of sectors	Promote growth in key sectors?
		Promote growth in key clusters?
2.	To encourage and promote	Reduce unemployment overall?
	employment and new enterprises	Reduce long-term unemployment?
	in Lewisham	Provide job opportunities for those in need of employment?
		Promote regeneration of suitable land in order to attract new
		enterprises and employment to Lewisham?
3.	To minimise the production of	Lead to reduced consumption of materials and resources?
	waste across all sectors and	Reduce household waste?
	increase reuse, waste recovery	Increase waste recovery and recycling?
	and recycling rates	Reduce hazardous waste?
	and respensing rates	Reduce waste in the construction industry?
4.	To use and manage the	Improve the quality of river water or ground water?
٦.	consumption of natural resources	Conserve water?
	in a sustainable manner	SUDS?
	iii a sustailiable iliaililei	Promote energy (renewable energy) and water conservation
_	To work at and only one the	Sustainable design and construction?
5.	To protect and enhance the	Protection of existing open space?
_	borough's open spaces	Provision and quality of open space?
6.	To conserve and enhance the	Conserve and enhance natural/semi-natural habitats?
	borough's natural habitats,	Enhance river environments and water quality of local rivers?
	biodiversity, flora and fauna and	Conserve and enhance species diversity, and in particular avoid
	increase peoples access to	harm to protected species?
	nature in all areas of the borough	Maintain and enhance sites designated for their nature
		conservation interest?
		Maintain and enhance woodland cover and management?
7.	To improve air quality and reduce	Improve air quality?
	noise and vibration	Reduce car use?
		Reduce vehicle movement?
		Reduce car use?
		Increase/enhance bicycle/walking routes?
		Proximity to public modes of transport?
8.	To reduce car travel and improve	Sustainable mixed use design?
	accessibility by sustainable	Proximity of growth areas to public transport links and incorporation
	modes of transport	of pedestrian and cycle infrastructure?
9.	To mitigate, and adapt to the	Sustainable mixed use design?
	impact of climate change	Proximity of growth areas to public transport links and incorporation
	,	of pedestrian and cycle infrastructure?
		Reduce greenhouse gas emissions?
		Reduce water and energy consumption in transport and built form?
		Lead to an increased proportion of energy needs being met from
		renewable sources?
		Flood protection?
		SUDS?

SA objective	Appraisal questions to guide the SA
10. To reduce and manage flood risk	Is there flood protection? SUDS? Decreasing run-off? Construction practices that adapt to flooding?
11. To maintain and enhance landscapes and townscapes	Reduce the amount of derelict, degraded and underused land? Improve the landscape and ecological quality and character? Decrease litter? Design?
12. To conserve and where appropriate, enhance the historic environment and other archaeological aspects of the borough	Conserve and enhance the historic built character of the borough, especially within designated conservation areas? Protect sites of archaeological and historic importance?
13. To provide sufficient housing and the opportunity to live in a decent home	Reduce homelessness? Increase the range and affordability of housing for all social groups? Reduce the number on unfit homes?
14. To improve the health and wellbeing of the population and reduce inequalities in health	Improve the quality or level of provision of health and leisure facilities and open spaces? Reduce death rates? Improve access to high quality, health facilities? Encourage healthy lifestyles through sustainable urban design?
15. To address deprivation promote social inclusion and ensure equitable outcomes for all communities	Reduce poverty and social exclusion and health inequalities in those areas most affected? Improve affordability to essential services to the home?
16. To provide for the improvement of education, skills and training	Improve the quality and level of educational infrastructure? Improve qualifications and skills of younger people? Improve qualifications and skills of adults?
17. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime	Reduce actual levels of crime? Reduce the fear of crime? Reduce the actual noise levels? Reduce noise concerns?
To encourage a sense of community identity, social cohesion and civic participation	Encourage engagement in community activities? Increase the ability of people to influence decisions? Improve ethnic relations?
19. To improve accessibility to leisure facilities, community infrastructure and key local services	Improve accessibility to key local services? Improve accessibility to shopping facilities? Improve the level of investment of in key community services?

Appendix 11 Alternative options put forward and assessed as part of the Core Strategy preparation

1.Issues and Options Stage (July to September 2005)

	OPTION	PROPOSED SUBMISSION STAGE
Housing		
Option 0.1	Set target for new housing as derived from the London Housing Capacity Study	Rejected in favour of Housing Option 0.2.
Option 0.2	Set target that exceeds London Plan or that derived from London Housing Capacity Study	Incorporated within Strategic Objective 2 and detailed within Lewisham's Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5).
Option 1.1	Set a preferred housing mix for affordable housing	Adopted. Incorporated into Strategic Objective 3, CS Policy 1.
Option 1.2	Set housing mix for market housing	A specific housing mix for market housing was rejected but housing mix criteria has been incorporated into CS Policy 1. Housing mix referred to in Strategic Objective 3.
Option 1.3	Set broad mix for all housing	Rejected in favour of Housing Options 1.1 and 1.2.
Option 1.4	No housing mix policy	Rejected in favour of Housing Options 1.1 and 1.2.
Option 2.1	To encourage the provision of special needs housing	Incorporated as part of Strategic Objective 3. A separate local policy is no longer required as policy requirements are contained within London Plan.
Option 2.2	To encourage the provision of special needs housing but ensure that surrounding land uses are considered so that a concentration of such housing is not created	Incorporated as part of Strategic Objective 3. A separate local policy is no longer required as policy requirements are contained within London Plan.
Option 3.1	Set out criteria for assessing new gypsy sites	Adopted as part of CS Policy 2.
Option 4.1	Encourage those with empty properties to bring them back into residential use	Incorporated as part of Strategic Objective 3.
Option 5.1	To seek a contribution to affordable housing on sites capable of providing more than 15 dwellings or sites of more than 0.5 hectares	Rejected. London Plan has since lowered threshold to 10 dwellings or more.
Option 5.2	To seek a contribution to affordable housing on sites capable of providing more than 10 dwellings	Adopted as CS Policy 1. London Plan requires affordable housing provision for 10 or more dwellings.
Option 5.3	To seek a contribution to affordable housing on all residential sites	Rejected on viability evidence.
Option 6.1	To seek, as a starting point for negotiations, a contribution of 20% of affordable housing	Rejected on housing need evidence.
Option 6.2	To seek, as a starting point for negotiations, a contribution of 35% of affordable housing	Rejected on housing need evidence.
Option 6.3	To seek, as a starting point for negotiations, a contribution of 50% of affordable housing	Adopted as part of CS Policy 1 and in conformity with the London Plan.

	OPTION	PROPOSED SUBMISSION STAGE
Option 6.4	To seek, as a starting point for negotiations, 50% of affordable housing as part of large housing developments	Rejected on housing need evidence.
Option 7.1	To seek an affordable housing contribution of 70% social rented and 30% intermediate across the whole Borough	Adopted as part of CS Policy 1 and in conformity with the London Plan.
Option 7.2	To seek only intermediate affordable housing in areas with an existing high concentration of social rented housing	Adopted in part and incorporated within CS Policy 1.
Option 7.3	To facilitate the provision of social rented housing 'off-site' in areas of high social rented housing as part of the affordable housing policy	Adopted in part and incorporated within CS Policy 1.
Option 7.4	To seek only social rented housing in areas which do not have a high concentration of this tenure type	Rejected. Not in conformity with the London Plan.
Option 7.5	To not specify a mix, and make those determinations on a case-by-case basis	Rejected on housing need evidence and not in conformity with London Plan policies.
Option 7.6	To seek, as part of the intermediate contribution, an element of key worker housing	Adopted as part of CS Policy 1. The requirements of intermediate housing have been revised since the option was presented for consultation.
Option 8.1	To require all housing to meet lifetime home standards	Adopted as part of CS Policy 1 and in conformity with the London Plan.
Option 8.2	To require all housing in major developments to meet lifetime homes standard	Rejected. Not in conformity with the London Plan.
Option 8.3	To require 10% of all new housing to be wheelchair accessible or easily adapted for those using a wheelchair	Incorporated as part of Strategic Objective 3 and CS Policy 1.
Option 8.4	To require 10% of all new housing in major development to be wheelchair accessible.	Rejected. See Option 8.3.
Option 9.1	Policy to ensure that any loss of housing and special needs accommodation is replaced at the same density	Forms part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and linking density to public transport accessibility.
Option 9.2	Policy to ensure that any loss of housing and special needs accommodation is replaced at higher densities.	Incorporated within Strategic Objective 2 and detailed within Lewisham's Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5).
Option 9.3	No policy requiring the replacement of housing and special needs accommodation lost.	Rejected. Policy requirements contained within the London Plan.
Option 10.1	Allow conversions	Option adopted. Forms part of Spatial Strategy (Spatial Policy 6).
Option 10.2	Allow conversions only for houses that have a net floor space of 130sq.m or more as originally constructed	Option adopted. Detail to be provided in the Development Management DPD.
Option 10.3	Allow conversions but require at least one family dwelling to be provided	Detail to be provided as part of Development Management DPD
Option 10.4	Do not allow conversions	Rejected on housing need evidence.

	NOILIGO	PROPOSED SUBMISSION STAGE
Option 1.2	The Council will require improved energy efficiency through consideration of the following criteria for assessment of new building developments: • Design of the buildings with passive solar design (orientated so living spaces face within 45° of south) – shading for non-residential. • Maximise Day lighting angles. • High insulation Window Glazing • Clothes Drying / amenity space provided. • Siting of doors and windows for natural ventilation. • Integration of renewable energy equipment should be encouraged where appropriate.	Adopted and incorporated within the Vision, Strategic Objectives 2, 5, 9, detailed within Lewisham's Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policies 7 and 8. Many of the option criteria are now contained with the Code for Sustainable Homes and BREEAM and within the London Plan.
Option 1.3	The Council shall require an assessment of energy demand of proposed major developments (either new build or conversion) with a floor space of 1000m ² or ten or more residential units demonstrating steps to apply the energy hierarchy.	Adopted as part of CS Policy 8.
Option 2.1	The Council will require all new residential and non-residential developments (either new build or conversion) with a floor space of 1000m2 or ten or more residential units to incorporate onsite renewable energy equipment to provide at least 10% of the predicted energy requirements of the development.	Rejected. A higher onsite renewable energy target was adopted.
Option 2.2	The Council will support the development of stand alone and roof mounted renewable energy schemes, where site conditions make them feasible. Criteria for assessment will include: Wind turbines: More viable in low density areas Assess suitability of the site (design, location, size, scale, access for maintenance – dependant on size of turbine). Assess likely impact of noise from blades and mechanical components for noise sensitive receptors assessed against local background noise. Assess visual obtrusiveness from public viewpoints Ensure minimum distances for reflected light and shadow flicker from sensitive adjoining landuses. Special consideration in Open Space areas / conservation area / historic interest area. Solar Panels / Photovoltaic's: Discrete siting on a building, designed as integral part of roof. Panels to life flush with the roof slope avoiding visual obtrusiveness. Assess visual compatibility in Conservation areas or on historic buildings – from public viewpoints. Any other renewable energy schemes (if external to the building): Sited appropriately without creating adverse amenity effects on adjoining land uses.	Part adopted within CS Policy 8. Detail criteria not adopted as part of Core Strategy policy. Detail can be provided as part of the Development Management DPD and by using national policy.

	OPTION	PROPOSED SUBMISSION STAGE
Option 3.1	FLOOD RISK AND THE SEQUENTIAL TEST The Council will consider development applications in areas identified as being subject to Zone 3 flooding (high risk) in line with the sequential test (PPG25). Flood hazard maps will be sourced from the most up to date information supplied by the Environment agency. Within these areas residential, commercial and industrial may be suitable, provided minimum standard of flood defence can be maintained (with the exception of minor householder applications). A local flood risk assessment and mitigation appropriate to nature and scale of development will be required. Development will not be permitted where existing defences, properly maintained, would not provide an acceptable standard of safety over the lifetime of a development, should a flood defence be breeched.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 10 in line with PPS25.
Option 3.2	FLOOD RISK ASSESSMENT FOR MINOR HOUSEHOLDERS The Council considers that applications by individual householders for minor extensions within identified flood hazard areas should not raise significant issues unless it would: Have a direct and adverse effect on a watercourse or flood defences; Impede access to flood defences; and Have a cumulative effect on flood storage capacity or flood flows.	Rejected. Not in line with PPG25 or the London Plan.
Option 3.3	RISK BASED APPROACH AND ASSESSMENT CRITERIA The Council will take a risk based approach to assessing proposals for developments in or affecting flood risk areas in line with the assessment criteria provided in PPG25.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 10 in line with PPS25.
Option 3.4	BALANCED MANAGEMENT OF FLOOD RISK The Council will employ the principle of 'balanced management' in relation to flood risk, allowing development which serves the social and economic needs of the community to proceed, whilst ensuring that flood risk is properly managed and mitigated, subject to the overriding principle that the Council will not normally permit development which places people or property at direct risk from flooding, or places this risk into other areas.	Rejected. Not in line with PPG25 or the London Plan.
Option 3.5	MITIGATION MEASURES IN DEVELOPMENTS For major development in Flood Zone 3, depending on the outcome of a Local Flood Risk Assessment, the Council may require flood protection and mitigation measures to be included in development which may be on or off site. This may include works, or contributions to the cost of works to provide, improve and maintain flood defences. In such cases, planning permission may be granted subject to appropriate planning conditions or planning obligations (s.106).	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, ,5) and CS Policy 10 in line with PPS25.

Option 3.7	SUSTAINABLE SOLUTIONS TO MITIGATE FLOOD RISK The Council will require mitigating measures accompanying development proposals within Zone 3 flood hazard areas to be subject to a sustainability appraisal. There will be a presumption in favour of: Employing good standards of urban design incorporating flood defences; Protection of ecology and safeguarding water resources Utilisation of sustainable urban drainage systems. Unsustainable solutions such as culverting and other engineering solutions will be scrutinised in order to determine whether a more environmentally sustainable alternative may be more appropriate. SUSTAINABLE DRAINAGE SYSTEMS (SUDS) The Council will require developers where there is a proposed reduction in the permeability of a site through construction or redevelopment, to demonstrate how surface water run-off is managed as close to its source as possible. The use of	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 10 in line with PPS25. Adopted as part of CS Policy 10. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.
Option 4.1	sustainable urban drainage systems will be encouraged for all developments regardless of whether they are in a flood risk area or not. AIR QUALITY ASSESSMENTS The Pollution Control Group within Lewisham Council requires an Air Quality sassessment (AQA) to be carried out where a significant change in air quality is expected or anticipated. There will also be a need to assess air quality implications where a significant change in relevant exposure (i.e. introduction and/or increase) is anticipated, such as the building of residential properties in an area of already poor air quality. Permission will not be granted unless mitigating measures are adopted to ensure compliance with national standards, not lead to an increase in the current exceedences levels and/or to eliminate or minimise public exposure.	Adopted as part of CS Policy 9. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.
Option 4.2	ARR QUALITY ASSESSMENT CRITERIA Areas exposure to the highest concentrations of pollutants and where significant public exposure occurs will be afforded the highest level of protection and the Council is determined to work towards the improvements of ambient air quality in those areas where the air quality objectives are likely to be exceeded. When assessing planning applications for major developments the Council will consider: The severity of the impacts on air quality and the scale of the emissions. The air quality in the area surrounding the proposed development The likely use of the development, that is the length of time people are likely to be exposed at that location Whether the proposal would impede the Council's overriding objectives to improve air quality such as a conflict with Lewisham Air Quality Action Plan. The Council does not intend to be prescriptive about the contribution to pollution levels that should be regarded as significant; each case will be assessed on merit.	Adopted as part of CS Policy 9. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.

	NOILIO	PROPOSED SUBMISSION STAGE
Option 5.1	DEVELOPMENTS ON CONTAMINATED LAND Where development is proposed on contaminated land, or land suspected of being contaminated, the Council will require developers to investigate and identify any remedial measures that may be required to deal with the hazards. Full details of proposals for remedial treatment will be required before a planning application is considered. Where necessary, the Council may appoint independent consultants to assess such proposals. The Council will require best practice mechanisms to enhance remediation of contaminated sites and encourage in principle the transformation of land back into beneficial use.	Rejected. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.
Option 5.2	POLLUTING DEVELOPMENTS Applications for a polluting or potentially polluting use will be assessed against the following criteria: the impact on neighbouring uses including loss of amenity; the design and appearance of the development; the hours of operation of the proposed development and its transport requirements, including the scope for transport by rail or water; the proposed after use of the site; any environmental benefits arising from the development, for example regeneration of derelict land; the possibilities for a time-limited permission in order to assess the impact of the development; the adoption of a waste reduction / minimisation strategy by the applicant which takes account of the disposal of solid / water / liquid wastes and airborne discharges.	Rejected. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.
Option 5.3	HAZARDOUS SUBSTANCES The Council will require any proposed or existing development containing hazardous substances to be stored in a manner than meets National Regulations, limits the risk to human health and safety and avoids all contamination of air, ground and water resources. Full details of mitigational storage facilities for hazardous substances will be required before a planning application is considered.	Rejected. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy.
Option 6.1	RIVER WATER QUALITY The Council will seek to protect and improve the water quality of Lewisham's Blue Ribbon Network to ensure healthy, and attractive natural habitats by ensuring major new developments: Provide adequate sewerage infrastructure capacity. Incorporate sustainable urban drainage systems to reduce the amount and intensity of urban run-off and pollution, where feasible, The Council will oppose proposals that are likely to lead to a reduction in water quality, unless suitable mitigational measures are provided.	Adopted as part of CS Policy 11.

	OPTION	PROPOSED SUBMISSION STAGE
Option 6.2	WATER RESOURCES	Adopted as part of Spatial Policy 1 and CS Policies 7, 8
	The Council will protect and conserve water supplies in order to secure Lewisham's	
	long term needs. In determining planning applications, boroughs should have proper	
	regard to the impact of proposals on water demand and existing capacity.	
	Preference will be given to proposals that ensure that adequate sustainable water	
	resources are available and:	
	 Minimise the use of treated water 	
	 Maximise rainwater harvesting opportunities 	
	 Incorporate grey water recycling systems. 	
Option 6.3	WATER AND SEWERAGE INFRASTRUCTURE CAPACITY	Option as stated not carried forward. Forms part of the
	Planning permission will only be granted for development which increase the	Core Strategy's Infrastructure Delivery Plan.
	demand for off-site service infrastructure (water supply, sewer drainage and	
	treatment) where:	
	1. Sufficient capacity already exists, or	
	2. Extra capacity can be provided in time to serve the development which will	
	ensure that the environment and the amenities of local residents are not adversely	
	affected.	
	When there is a capacity problem and improvements in offsite infrastructure are not	
	programmed, planning permission will only be granted where the developer funds	
	appropriate improvements which will be completed prior to occupation of the	
	development.	
Option 6.4	UTILITIES DEVELOPMENT	Option as stated not carried forward. Forms part of the
	The development or expansion of water supply or waste water facilities will normally	Core Strategy's Infrastructure Delivery Plan.
	be permitted, either where needed to serve existing or proposed development in	
	accordance with the provisions of the Development Plan, or in the interests of land	
	term water supply and waste water management, provided that the need for such	
	facilities outweighs any adverse land use or environmental impact, and that any	
	such adverse impact is minimised.	
Option 7.1	NOISE ATTENUATION	Option as stated not carried forward. Policy
	The Council will seek to minimise the adverse impacts of noise from new	requirements contained in London Plan and national
	development proposals. In particular, separation of new noise sensitive	guidance so no need for specific Core Strategy policy.
	development from major noise sources will be sought wherever practicable. The	Will review as part of preparing the Development
	Council will support new technologies and improved practices to reduce road and	Management DPD.
	rail noise and will seek to contain noise from late night entertainment and other 24-	
	hour activities	
	The Council will resist development that could lead to unacceptable levels of noise.	
	Where noise-sensitive development is proposed close to an existing source of	
	noise, or when a noise generating development is proposed, the Council may	
	require the developers to have prepared a detailed noise impact survey outlining	
	possible attenuation measures.	

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Option 7.2	Priority ATTENUATION Proposals for light-generating development, floodlights or otherwise obtrusive lighting may be required to be accompanied by a detailed light-impact survey outlining possible attenuation measures.	Option as stated not carried forward. Policy requirements contained in London Plan and national guidance so no need for specific Core Strategy policy. Will review as part of preparing the Development Management DPD.
Option 8.1	BUILDING MATERIALS AND AGGREGATES New developments will be encouraged to demonstrate an efficient use of building materials, including appropriate use of high quality materials and recycled aggregates, where appropriate. Guidance can also be taken from the Mayor of London's SPG on Sustainable Design and Construction.	Adopted as part of Spatial Policy 1 and CS Policy 8.
Waste management		
Option 1.1	The Council shall encourage the minimisation of generation of waste and increased recycling rates. All planning applications will be assessed to consider what practical steps can be taken to apply the waste hierarchy.	Adopted as part of CS Policy 13.
Option 2.1	The Council will encourage new waste management facilities in the northern preferred employment locations, (as shown in the present UDP proposals map) in line with Best Practicable Environmental Option (BPEO) procedure.	Adopted as part of Spatial Policy 2 and CS Policy 13.
Option 2.2	The Council will encourage new waste management facilities in all preferred employment locations and other suitable locations such as Convoys Wharf in line with Best Practicable Environmental Option (BPEO) procedure.	Adopted as part of Spatial Policy 2, CS Policy 13 and Strategic Site Allocation 2.
	 (a) transport, traffic and access arrangements avoid increased traffic through residential areas; (b) mitigating adverse effects of emissions of particulates, dust and gases, odour, noise, litter, vermin or birds; (c) no adverse effects on surface and underground water, nor land stability; (d) the facility is not visually intrusive, with appropriate screening / landscaping; (e) mitigating adverse effects on any element of nature conservation or historic interest; (f) hours of operation and duration of operations are controlled so as not to disturb neighbours; (g) reinstatement of the site to an appropriate after use (if relevant); and (h) compatibility with adjoining land uses. 	requirements contained in London Plan and national guidance so no need for specific Core Strategy policy. Will review as part of preparing the Development Management DPD.
	Sites of Nature Conservation Importance, Metropolitan Open Land, Public Open Space and Urban Green Space will generally not be regarded as appropriate locations for waste management facilities.	
Option 2.4	The Council will encourage new recycling 'bring points' in key service / use areas and adequate waste storage facilities in new developments.	Adopted as part of CS Policy 13.

	OPTION	PROPOSED SUBMISSION STAGE
Option 3.1	The Council will encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council managed waste management facilities only).	Option as stated not carried forward. Forms part of Spatial Strategy and CS Policy 13.
Option 3.2	The Council will encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council managed waste management facilities, and private enterprises).	Option as stated not carried forward. Forms part of Spatial Strategy and CS Policy 13.
Option 4.1	The Council will require all new residential developments (5 units or more) to incorporate adequate waste storage and recycling facilities. Planning applications for residential developments will consider the following: The provision of facilities to recycle or compost at least 25% of household waste by means of separated dedicated storage space. Provide for local shared recycling facilities, one site per 500 persons, or per 1000 habitable rooms, as well as storage facilities for kerb side collection. Appropriate siting of storage within the development, visual screening and health and safety precautions.	Option as stated not carried forward. Adopted as part of CS Policy 13. Option is too detailed for a Core Strategy policy. Will review as part of preparing the Development Management DPD.
Option 4.2	The Council will require all large new residential developments (15 units or more) to incorporate waste storage and recycling facilities. Planning applications for residential developments will consider the following: This option would create a policy within the Lewisham Borough Development Policies requiring developers to incorporate waste management facilities into new developments of major nature (i.e. more than 15 dwellings). This will ensure that o. The provision of facilities to recycle or compost at least 25% of household waste by means of separated dedicated storage space. Provide for local shared recycling facilities, one site per 500 persons, or per 1000 habitable rooms, as well as storage facilities for kerb side collection. Appropriate siting of storage within the development, visual screening and health and safety precautions.	Option as stated not carried forward. Adopted as part of CS Policy 13. Option is too detailed for a Core Strategy policy. Will review as part of preparing the Development Management DPD.
Option 4.3	The Council will require all new commercial / business operations demonstrate how waste storage and recycling facilities are to be incorporated onto the site.	Option as stated not carried forward. Adopted as part of CS Policy 13.
Open space and biodiversity	diversity	
Option 1.1	To protect existing and increase the provision of all types of Open Spaces in the Borough to a standard of 1.7 hectare per 1000 population	Part adopted within Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 12. A specific standard was not adopted due to land constraints.
Option 2.1	To protect existing open space from inappropriate development and take opportunities to enhance	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 12.
Option 2.2	In addition to protecting existing open space, the Council will seek to identify priority areas and to create new public open space and/or enhance public access to existing public space	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5, 6), CS Policy 12 and Strategic Site Allocation 1, 2, 3, 4, 5, 6.
Option 3.1	To improve the quality of all types of Open Spaces in the Borough, to ensure their use is maximised for the purposes of which they are created.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5), CS Policy 12.

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Option 4.1	To ensure the protection and enhancement and creation of natural habitats, particularly in areas of deficiency	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5), CS Policy 12.
Option 5.1	To secure the protection of ecological and recreational links and corridors	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5), CS Policy 12, 14.
Employment		
Option E1	Maintain current Strategic Employment Location Boundaries (Status Quo) (See Site Allocations for Strategic Employment Locations and Maps 1 and 2)	Rejected on economic objectives.
Option E2	Remove or add sites to Strategic Employment Locations (See Site Allocations for Strategic Employment Locations and Maps 1 and 2)	Rejected on economic objectives.
Option DEA1	Retain all the current Defined Employment Areas and refuse planning permission for changes of use away from business uses	Rejected on economic objectives.
Option DEA2	Remove protection for business/industrial uses in Defined Employment Areas	Rejected on economic objectives.
Option DEA3	Review appropriateness of retaining Defined Employment Areas based on a set of criteria, with a view to removing protection for business, industrial and commercial uses from a number of sites.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2), CS Policy 4, Strategic Site Allocations 3, 4, 5.
Option DEA4	Allow for 100% residential development in Defined Employment Areas .	Rejected on regeneration objectives.
Option DEA5	Allow 'mixed use' commercial and residential with an element of affordable housing (suggest 50%) in Defined Employment Areas. Also consider community facilities	Incorporated as part of Spatial Strategy (Spatial Policies 1, 2), CS Policy 4, Strategic Site Allocations 3,
	such as schools, surgeries etc.	4, 5.
Option DEA6	New Development in Defined Employment Areas should be 100% affordable housing where possible	Rejected on viability grounds.
Option DEA7	Create new affordable employment floorspace by requesting contributions from large new developments	Incorporated as part of Spatial Strategy (Spatial Policies 1, 2), CS Policy 4, Strategic Site Allocations 3, 4, 5.
Option OTH1	Preserve all these sites in business/industrial use	Rejected on viability grounds.
Option OTH2	Remove protection from these sites and allow redevelopment for mixed use commercial and housing or 100% housing	Rejected on viability grounds.
Option OTH3	Assess applications for the redevelopment of these sites flexibly on the basis of criteria	Incorporated as part of Spatial Strategy (Spatial Policies 1, 2), CS Policy 4, Strategic Site Allocations 3, 4, 5.
Option OFF1	Direct larger office development to the Major Town Centres of Lewisham and Catford. Small scale developments will generally be acceptable in other locations (e.g. district town centres) and also ancillary to existing employment generating uses.	Incorporated as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5), CS Policy 6.
Option CRE1	Identify 'Creative Quarters' where the Council will encourage development of creative enterprises	Incorporated as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5), CS Policy 6.

	NOTIO	PROPOSED SUBMISSION STAGE
Option LW1	Live-work developments should be welcome in Defined Town Centres, and	Included within Spatial Policies 2, 3, 4, 5 and CS Policy
	locations closely associated with Local Shopping Parades where the use does not	
	conflict with residential amenity. Applications for live/work developments in Defined	
	Employment Areas and other employment sites would be judged according to the	
	policies relevant to those areas.	
Option LW2	Live-work developments should only be allowed in attractive older	Not carried forward. Will review as part of the
	workshop/warehouse buildings as a way of ensuring their continued use	Development Management DPD.
Option LW3	Live Work Developments should be refused planning permission in favour of mixed	Not carried forward. Will review as part of the
	use commercial and residential development or 100% residential development	Development Management DPD.
Transport and parking	ing	
Option TR1	Allow higher density development only in places where good public transport is	Adopted as part of Spatial Policy 1 and CS Policy 8.
	available and restrict development in places with poor public transport.	
Option TR2	Require transport assessment/travel impact statements for all new developments.	Rejected. Adopt position contained in PPG13.
Option TR3	Set thresholds for development that will be required to submit travel impact	Adopt position contained in PPG13. Incorporated as
	statements.	part of CS Policy 14.
Option TR4	Require green travel plan for large scale developments or developments which will	Adopt position contained in PPG13. Incorporated as
	generate a 'significant' amount of movement.	part of CS Policy 14.
Option TR5	Require developers to contribute to public transport infrastructure where	Adopted as part of Spatial Policy 1, CS Policy 21,
	deficiencies are identified.	Strategic Site Allocation 1 and the Core Strategy's
		Infrastructure Delivery Plan.
Option TR6	Require developers only to meet the immediate transport improvements related to	Adopted as part of Spatial Policy 1, CS Policy 21,
	their development.	Strategic Site Allocation 1 and the Core Strategy's
		Intrastructure Delivery Plan.
Option TR7	Manage and distribute traffic in accordance with the road hierarchy established in the Unitary Development Plan.	Rejected. No longer a matter for the Core Strategy.
Option TR8	Introduce engineering, education and enforcement measures to improve road safety.	Rejected. No longer a matter for the Core Strategy.
Option TR9	Continue to use the UDP Car parking standards for new development proposals.	Rejected in favour of Option TR10.
Option TR10	Adopt the London Plan standards for car parking	Adopted as part of CS Policy 14.
Option TR 11	Introduce some other car parking standards	Rejected in favour of Option TR10.
Option TR12	Require specific cycle provision as part of all developments.	Adopted as part of CS Policy 14.
Option TR13	Negotiate cycle provision on an individual basis	Rejected on environmental and social objectives.
Option TR14	Promote car-free residential development in areas with excellent public transport	Adopted as part of CS Policy 14.
	facilities.	
Option TR15	Insist on some minimum parking provision in relation to all residential development.	Rejected on environmental and social objectives.
Option TR16	Extend the provision of controlled parking zones (CPZs)	No longer a matter for the Core Strategy but part included in CS Policy 14.
Option TR17	Require Developers to contribute towards the implementation of CPZs	No longer a matter for the Core Strategy but included within the parameters of CS Policy 21.

	NOLLO	PROPOSED SUBMISSION STAGE
Option TR18	The Council will encourage the safeguarding of transport facilities through avoiding inappropriate development	Adopted as part of Spatial Strategy (Spatial Policy 2) and Strategic Objective 9.
Option TR19	The Council will support and promote public transport improvements	Adopted as part of Spatial Strategy (Spatial Policy 2) and Strategic Objective 9.
Option TR20	The Council will support rail and other transit improvement schemes that benefit local residents, subject to acceptable environmental impacts, in particular; • East London Line Extension Phase 2 • Extension of DLR from Lewisham to Catford • DLR 3 Car Capacity Enhancement • Extension of the Croydon Tramlink to Lewisham • Extension of the Greenwich Waterfront Transect to Canada Water • Orbital Rail Route Improvements	Adopted as part of Spatial Strategy (Spatial Policy 2) and Strategic Objective 9. Some schemes are no longer going forward.
Retail and town centres		
Lewisham : Role And Function	Function	
Option 1	Aim to achieve Metropolitan status for Lewisham town centre.	Adopted as part of Strategic Objective 4, Spatial Strategy (Spatial Policy 2).
Option 2	Maintain and enhance Lewisham's current status as a major centre.	Rejected for Option 1.
Option 3	Are there other options for the Role and Function of the Lewisham Major Centre?	N/A
Role And Function		
Option 1	To maintain, protect and enhance Catford's status as a major centre.	Adopted as part of Spatial Strategy (Spatial Policy 2) and CS Policy 6.
Option 2	To secure the regeneration of Catford town centre by promoting high quality design in the built and natural environments.	Adopted as part of Spatial Strategy (Spatial Policy 2) and CS Policies 6, 15.
Option 3	Are there other options for the Role and Function of the Catford Town Centre?	N/A
District Centres: Roles and Functions	s and Functions	
Option 1	Aim to maintain the current level of diversity offered within the district centre.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6.
Option 2	To enhance and further encourage any existing strength of the district centre.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6.
Option 3	Aim to ensure a balance of comparison and convenience goods which is similar to the national averages.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6.
Option 4	Are there any other options available to address the role and function of the district centres.	N/A
District Centres Vitality And Viability	y And Viability	
Option 1	Use the designation of core and secondary or non-core areas for designating uses within the centres. This is the current method used.	Adopted as part of CS Policy 6.
Option 2	Designate specialist areas or quarters which have a focus on a particular or complimentary use or activity.	Rejected in favour of Option 1.
Option 3	No restrictions on various uses within a designated centre boundary.	Rejected in favour of Option 1.

	OPTION	PROPOSED SUBMISSION STAGE
Option 4	Are there any other options which may be available to address the issue of vitality and viability?	N/A
District Centres: Acce	District Centres: Accessibility And Car-Parking	
Option 1	To encourage greater accessibility by public transport, walking and cycling to all retail and town centres	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policies 7, 14.
Option 2	Are there other options which could address the issue of accessibility and carparking.	N/A
District Centres: High	District Centres: High Quality Environment And Design	
Option 1	Policies which encourage good quality design and seek improvements to the existing retail environment.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6, 15.
Option 2	Developing a specific design guide for the each (or specific) district centres	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policies 6, 15.
Option 3	Are there other options which could encourage high quality retail environment and design.	N/A
District Centres: Boundary Modifications	idary Modifications	
Option 1	OPTION 1: Retain the boundaries as currently indicated in the Unitary Development Plan (UDP). Detailed maps are provided in the full copy of the document.	Part adopted. Boundary changes were made so that New Cross and New Cross Gate are a combined district centre
Option 2	OPTION 2: Modify any of the district centre boundaries?	Boundary changes were made so that New Cross and New Cross Gate are a combined district centre
Neighbourhood Centri	Neighbourhood Centres: Role And Function	
Option 1	The role and function of Neighbourhood Centres is to provide for the daily needs for goods and services for the surrounding local community. This role should be maintained, enhanced and where possible further encourage this local role and function.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6.
Option 2	Plan for decline in unsuccessful centres. Planning policies could address decline in some centres and based on local circumstances	Rejected on economic and social objectives.
Option 3	Are there other ways in which the role and function of local needs can be addressed through planning policy?	N/A
Neighbourhood Centri	Neighbourhood Centres: Vitality and Viability	
Option 1	Incorporating the use of designated boundaries for the Neighbourhood centres within the proposals map.	Adopted as part of CS Policy 6.
Option 2	Encouraging a safe, clean and inviting shopping environment.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policies 6, 15.
Option 3	Seeking to maintain a healthy supply of local shops providing the necessary daily goods and services.	Adopted as part of Spatial Strategy (Spatial Policies 1, 2, 3, 4, 5) and CS Policy 6.
Option 4	Are there other ways in which the vitality and viability of the neighbourhood centres can be maintained and enhanced?	N/A

Out-Of-Centre Proposals

Option 3

Option 4

Option 2

Option '

Option 5

Option 3

Option 4

Option 2

Option 1

Option EHCF1

Option 3

Option 2

Option EHCF2

	OPTION	PROPOSED SUBMISSION STAGE
Option EHCF3	Require major developments to undertake a social impact assessment.	Not carried forward as part of the Core Strategy. Policy
		requirements contained in London Plan and national
		guidance so no need for specific Core Strategy policy.
Option EHCF4	Encourage the provision of health, education and community facilities to locate in	Adopted as part of Spatial Strategy (Spatial Policy 1, 2,
	areas with good public transport.	3, 4, 5), CS Policies 7. Policy requirements contained in
		London Plan and national guidance.
Option EHCF5	Provide flexibility for health, education and community uses serving a very local	
	area to locate in residential areas.	
Option EHCF6	Facilitate the up-grade / redevelopment / improvement of existing facilities	Adopted as part of CS Policy 20.
Option EHCF7	Ensure leisure, community, arts, cultural, entertainment and sports facilities are	Adopted as part of CS Policy 19.

Rejected. No longer an option.

Include criteria based policy to help determine planning applications for temporary

Protect historic schools from demolition

school buildings.

Option EHCF10

Option EHCF8
Option EHCF9

Option EHCF11

Identify temporary sites for schools while improvement programme is underway.

New Secondary School on site of Ladywell Leisure Centre

provide access for users

located in appropriate places that both contribute to sustainability objectives and

Part of CS Policy 16.

Rejected. No longer an option. Rejected. No longer an option.

2.Core Strategy Options report (February 2009)

	OPTION	PROPOSED SUBMISSION STAGE
Strategic Spatial Option	tion	
Option.1	Sought to encourage borough-wide regeneration and growth by creating a regeneration corridor primarily focused in the north of the borough in the localities of Cafford, Lewisham, Deptford and New Cross. Under this option, the Council would seek to allocate certain land in Deptford and New Cross currently designated as a Strategic Industrial Location and a Local Employment Location for mixed use development	Adopted and forms the Lewisham Spatial Strategy (Spatial Policies 1, 2, ,3, 4, ,5).
Option 2	Sought to encourage a more modest approach to borough-wide regeneration and growth. The key difference in comparison with Option 1 is that under Option 2, the six sites proposed as Mixed Use Employment Locations in Deptford and New Cross would continue to operate as a Strategic Industrial Location and a Local Employment Location.	Rejected in favour of Strategic Spatial Option 1.

Appendix 12 Baseline information and future trends

INDICATOR	QUANTIFIED DATA	COMPARATORS	TARGETS	TRENDS	ISSUE IDENTIFIED	ACTION / ISSUES FOR
						PLAN/SA
HOUSING						
Number of Additional Dwellings	2002 – 927 2003 – 980	Housing capacity calculated on a borough	870 per annum (The London Plan)	Target being met. Net approvals for 2003 & 2004	Need to continually accommodate additional homes	Plan – accommodate new housing.
	GLA Housing Provision Survey 2002 & 2003, www.london.gov.uk	basis. Comparisons not relevant.		considerably higher than previous 5 years.	within the borough.	S.A – objectives relating to meet housing target.
No. of affordable dwellings.	NEED INFORMATION	Nil	No target. Need for affordable housing exceeds total supply of all housing.	N/A	Given considerable need for affordable housing, increasing the supply a key issue.	
New affordable housing as a % of all new housing.	NEED INFORMATION	Zil	50% of all housing to be affordable (The London Plan)	N/A	Given considerable need for affordable housing, increasing the supply a key issue.	Plan – generate additional affordable housing. S.A – affordable housing provision a key objective.
Tenure Mix of Affordable Housing	NEED INFORMATION	Ī	70% social rented / 30% intermediate (The London Plan)	N/A	Tenure mix of affordable housing.	
% households in housing need	Borough Wide – 9.3% Lewisham Housing Needs Survey (November 2003)	London – 18.4% Greater London Housing Requirements Study, GLA/Opinion Research Services, December 2003	N:I	N/A	Housing need affecting almost 1 in 10 households on average, but over 1 in 5 in certain areas (around Deptford)	Meeting housing needs a priority.
% households living in unsuitable housing	Borough Wide – 19.6% Lewisham Housing Needs Survey (November 2003)	Σij	N:I	Getting Worse. 1998 Survey put this figure at 15.2%.	Almost 1 in 5 households considered to be living in unsuitable housing borough wide. Most concentrated in Evelyn & New Cross wards (40%).	Providing housing which meets the needs of the community. Facilitating housing improvements.
Density of new development.	NEED INFORMATION	NI.	London Plan indicative density ranges.	N/A	Increase densities in all areas to accommodate new housing.	Maximise use of land.
No of bedrooms in new dwellings.	NEED INFORMATION	Nil	Nil	N/A	Provide for the housing needs of the community in terms of dwelling types and sizes.	Meet the housing needs of the community.
% of new housing built to lifetime homes standards.	NEED INFORMATION	N/A	100% (London Plan)	N/A	New homes built o lifetime homes standards.	
% of new homes wheelchair accessible or easily adapted to be wheelchair accessible.	NEED INFORMATION		10% (London Plan)		Wheelchair accessible homes.	

ACTION / ISSUES FOR PLAN/SA	The state of the s	Enjoyable and safe town centres.	Make provision for additional comparison floor space + department store	Review of core area policy. Protection of A1 shops. Role & function of centre. Role of evening economy
ISSUE IDENTIFIED	O contract of the contract	Quality of town centres Redevelopment of town centre areas.	Aspiration to become Metropolitan Centre	% of A3 in whole centre
TRENDS				Over the past 10 years LEWISHAM A1 uses have declined. A2 has remained constant and A3 has increased BLACKHEATH A1 has remained constant A2 & A3 both increased CATFORD A1 uses have declined A2 remained constant & A3 increased significantly DEPTFORD A1 uses have increased DOWNHAM: A1 uses have increased A1 uses have increased A1 uses have increased A1 uses have increased A1 uses have declined slightly LEC GREEN: A1 uses have declined A2 has increased NEWCROSS A1 uses have declined. A2 has emained constant and A3 has increased. SYDENHAM A1 uses have declined. A2 has remained constant and A3 has increased. SYDENHAM A1 uses have declined. A2 has remained constant and A3 has increased. SYDENHAM A1 uses have declined. A2 has remained constant and A3 has increased
TARGETS	C C C C	None	100,000 sq.m. + department store	70% in A1 use in Core
COMPARATORS			Other metropolitan centres eg Bromley info needed?	GB Average for Town Centre Convenience 9.3% Comparison 48.1% Service 30.7%
QUANTIFIED DATA	C de la companya de l	resident Survey Information. NEED INFORMATION	79,246 sq.m.	LEWISHAM A1 = 63% A2 = 15% BA3 = 17% BLACKHEATH A1 = 59% A2 = 14% A3 = 23% CATFORD A1 = 51% A2 = 14% A3 = 14% A2 = 14% A3 = 14% A2 = 14% A3 = 14% A1 = 62% A2 = 7% A3 = 14% A1 = 62% A2 = 10% A2 = 10% A2 = 10% A3 = 18% EORESTHILL A1 = 88% A2 = 10% A3 = 22% A1 = 46% A2 = 10% A2 = 10% A3 = 22% A1 = 40% A2 = 11% A1 = 54% A2 = 11% A2 = 11% A2 = 11% A2 = 11% A3 = 27% A2 = 11% A2 = 11% A2 = 11% A2 = 11% A3 = 27% A2 = 11% A2 = 11% A3 = 2004.
INDICATOR	RETAIL	Resident satisfaction with town centres	Total floor space in Lewisham	Number and % of A1, A2 &A 3

TARGETS Aim is No worse than
nation Average
Match Bromley?
None

INDICATOR	INDICATOR QUANTIFIED DATA COMPARATORS TARGETS	COMPARATORS	TARGETS	TRENDS	ISSUE IDENTIFIED	ACTION / ISSUES FOR
						PLAN/SA
No of planning applications for alterations to listed buildings / within conservation areas.	Development Control Statistics. NEED INFO	None	None	None identified	Protect built heritage	Protect built heritage. Reuse of listed buildings
Resident satisfaction of town centres / public space.	Best Value indicators available.	No information	Various for Crime, Transport, Open Space (none for urban space).	None identified	Quality of urban spaces	Quality urban spaces.
ENVIRONMENT						
Total Household waste stream.	2003: 80% incinerated (SELCHP) 10% Land filled 8% Recycled. (2002/03: 7.04%) TOTAL: 116,022 tonnes SOURCE: Lewisham Draft Waste Management Strategy.	GREATER LONDON: (2003) Landfill: 71% Incineration: 20% Recycled: 9% (Greenwich 7% Bromley 15%) SOURCE: The Mayors State of the Environment Report for London.	RECYCLE: Lewisham: 2003/04: 10% 2005/06: 18% National: 2005/6: 25% 2010: 30% 2015: 33%	National waste growth projected at 3% per annum. Predicted 161,000 tonnes in Lewisham by 2010. Recycling levels in the borough are improving slowly.	Increased levels of recycling required, waste sorting and management sites required.	Provision of waste management sites in suitable locations.
No. of waste management sites within Lewisham	51 Mini-recycling sites Plus 12 other sites: 1 Civic amenity site 1 Incinerator 6 Processing sites 1 C& D site 3 Transfer stations SOURCE: GLA Waste Management Strategy.	Waste Management sites (not mini recycling) -Greenwich 26 -Southwark 27 -Tower Hamlets 38	NONE	NO TREND IDENTIFIED	Availability and distribution of management sites.	Provision of waste management sites in suitable locations.
No. of development applications approved with waste mgmt / recycling facilities incorporated.	NEED INFORMATION Development Control	NONE AVAILABLE	NONE AVAILABLE	NONE AVAILABLE	Increase awareness needed of Waste Management /recycling close to source.	Provision of waste management facilities within new developments.
No. of developments granted planning permission incorporating renewable energy solutions.	NEED INFORMATION Anecdotal evidence from D.C Planners suggests level is low.	NOT AVAILABLE	Mayor of London, Energy Strategy - At least one R.E Scheme in every borough by 2010.	Renewable energy schemes are slow in being adopted.	Increase support and encouragement of renewable energy schemes.	Increase renewable energy schemes.

ACTION / ISSUES FOR	ly Encourage energy efficiency and reduce vehicle dependence to reduce CO ₂ emissions.	Increase renewable energy schemes.	Encourage energy efficiency. Minimise air pollution.	
ISSUE IDENTIFIED	Reduce CO ₂ emissions primarily created by road transport.	Increase energy use from renewable sources.	Reduce energy consumption from non-renewable sources (fossil fuels) Lewisham may not meet air quality objectives.	
TRENDS	5% increase expected to continue.	Note: Sustainability board proposed to purchase green energy making Lewisham 8th highest user in Europe? CHECK WITH BRIAN.	None available Note: Domestic is highest consumer. Lewisham may not meet air quality objectives.	
TARGETS	Reduce national CO ₂ emissions by 20% by 2010, (1990 figures)	No specific targets	Reduce national CO ₂ emissions by 20% by 2010, (1990 figures) NO ₂ Standard 40µg/m³ (21ppb) annual	mean by 2005 Particulates (PM ₁₀) Standard 40µg/m² (21ppb) annual mean by 2005 (Air Quality Regulations 2000 and (Amendment) Regulations 2002)
COMPARATORS	NEED INFORMATION (more research required)	NEED INFORMATION	LONDON WIDE (1999 – 2000) Commercial: Energy (IMWh) 50,934,555 Enissions (tomes Co ₂) 13,161,174 Domestic Energy (IMWh) 68,343,839 Enissions (tomes Co ₂) 18,692,169 Transport Energy (IMWh) 32,666,664 Enissions (tomes Co ₂) 8,547,816 (Source: GLA 2002 – State of the Environment Report for London 2003) NO2,(2002 levels) London Central (kerbside)	80µg/m² Greenwich (roadside) 54µg/m³ Tower Hamlets (Roadside) 61µg/m³ London Central (kerbside) 44µg/m³ Greenwich (roadside)
QUANTIFIED DATA	721,727 tonnes (1999) projected as 761,601 (2005) – 5% increase. London CO ₂ emissions created by: 65% Road Transport 25% Rail and Underground 10% Aviation. (SOURCE: Draft Local Air Quality Plan 2003)	NEED INFORMATION	LEWISHAM DATA NEEDED: NO2 50µg/m³ (2002 levels)	PM ₁₀ particles 31µg/m³ (2002 levels) (Source: Review and assessment of air quality in
INDICATOR	Level of CO ₂ emissions	Total energy used in borough sourced from renewable schemes.	Energy consumption levels and resulting emissions Levels exceeding main air pollutant	quality standards - NO ₂ and PM ₁₀ particles

	A H & C C L L L H & L C	OCC TACA CACO	OHLO CAH			COL OLITOOT NOITON
NO POINT	GOAN IFIED DATA	COMPARATORS	IARGELS	I KENDS	ISSUE IDENTIFIED	PLAN/SA
		26µg/m³ Bexley (Roadside) 42µg/m³				
No. of complaints relating to noise	2001/ 2002 8,147 noise complaints were dealt with in Lewisham. Increase of 14% from 00/01. 3,668 new complaints, majority resolved, 250 abate notices served, 19 cases of legal action. Source: Lewisham Corporate Plan, Environmental Enforcement Team statistics (check data sources).	London: 13% of households rated noise from road traffic was a 'serious problem', comparatively same level 4% Noisy neighbours. (Source: GLA London Household Survey 2002 – Mayors Ambient Noise Strategy).	NONE AVAILABLE	NONE AVAILABLE	Consider impact of noise generating activities	Consider the impact of noise generating activities.
Area of land identified as contaminated.	Need specific information, Complete land inspection ongoing through Contaminated Land Inspection Strategy. Some info already on GIS (?). Completion due 2005? SOURCE: Lewisham: Contaminated Land Inspection Strategy.	NEED INFORMATION	NEED INFORMATION	More land will be identified as contaminated as redevelopment occurs.	Ensure contaminated land is identified, effects minimised and land remediated to allow reuse.	Environmental Impacts of contaminated land and reuse where possible.
No. developments approved on contaminated sites per year.	NEED INFORMATION: Development Control <u>.</u>	NEED INFORMATION:	NEED INFORMATION	No trend identified	Ensure contaminated land is identified, effects minimised and land remediated to allow reuse.	Environmental Impacts of contaminated land and reuse where possible.
Chemical Water quality of main rivers	Ravensbourne river Between 1988/90 – 2001/03 (C classification = fairly good) 1997-2001 – B=Good. Little Quaggy 1988-1996 – C=Fairly good. 1997-2003 – B=Good. SOURCE: DEFRA EDigest River Water Quality Database.	UK (2002) estimated 95% of rivers good or fair. (2003) 73% Good. England 93% of rivers good or fair (2003) 62% good quality compared with 43% in 1990.	Not available	No trends identified	Avoid activities that pollute waterways.	Minimise pollution of waterways.
Area of Public Open Space / outdoor recreation (ha) per 1000 population	21.8% of Lewisham's land area is Open Space (560). 1.67ha per 1000 head of population (SOURCE: Lewisham Open Space Strategy 2004 – 2009)	Check to see if any available	National 2.43ha Lewisham 1.7ha	None identified	Inadequate levels of Open Space – must increase.	Protect and enhance Open Space.

INDICATOR	QUANTIFIED DATA	COMPARATORS	TARGETS	TRENDS	ISSUE IDENTIFIED	ACTION / ISSUES FOR
						PLAN/SA
% of Lewisham identified as deficient in Open Space	19.45% (as calculated using MapInfo – measuring shapes over total area of Lewisham).	None available	None	May increase as more Open Space areas are developed in areas identified as deficient.	More Public Open Space areas are needed in areas identified as deficient.	Create opportunities for additional public open space.
Gains and Losses in recreational Open Space (ha per year)	Gain = 9ha Loss = 10ha Average Net Change = -1ha (SOURCE: GLA State of Environment Report 2003)	Greenwich (+4 / -0) = +4 Net Newham (+5 / -1) = +4 Net Bexley (-0 / -2) = -2 Net	None	None identified	Retaining and improving recreational areas.	Protect and enhance recreational open space facing increasing pressure from housing development.
% of Urban Residential Population within 500m (15min walk) of public open space.	73% of park users surveyed travelled less than 500m to use a park. (SOURCE: Lewisham Open Space Strategy 2004 – 2009).	None available	None available	None identified	Retaining and improving recreational areas.	Protect and enhance recreational open space and linkages to them.
No. of planning applications obtaining Open Space or public access linkages through s.106 agreements per year.	INFORMATION NOT AVAILABLE	N/A	NONE	Not available	Ability to increase quality, amount and linkages to Open Spaces.	Protect and enhance recreational open space and linkages to them.
% of users satisfied with parks and open spaces. (BV119)	70% (2003/4) SOURCE: Lewisham Best Value, Corporate Plan.	Also see criteria for Green Flag Awards, other boroughs.	69% (2003/4) 72% (2006/7)	Quality of Public Open Space is improving.	Retaining and improving recreational areas.	Protect and enhance recreational open space
% of Open Space managed as habitat for nature conservation purposes	3.5% 2001 / 2002 SOURCE: Lewisham Open Space Strategy 2004 – 2009)	None Available	Increase to 4.5% from 3.5 by 2004/05; 5% by 2004/05 5.5% by 2006/7	None Available	Management of natural habitats.	Protection and enhancement of natural habitats.
Change in populations of priority (locally important) species.	Priorities species for Lewisham are: - Black Redstart Bird (10% of national breeding pop ^{ul}) - Stag beetle (Lewisham national hotspot') - House Sparrow - Song Thrush SOURCE: Lewisham Biodiversity Action Plan.	Priority species most significant to Lewisham area, in relation to rest of London and UK – NO QUANTITATIVE DATA AVAILABLE AT LOCAL LEVEL	Monitored through Local Biodiversity Action Plans.	Anecdotal evidence populations are on decline (Source: Lewisham Biodiversity Action Plan).	Destruction of habitat through proposed redevelopment.	Protection and enhancement of natural habitats.
Length of non-tidal rivers restored per annum (m)	(2001/2002) River Quaggy, Chinbrook meadows 400m restored. Pool River Catford, 50m restored. SOURCE Green Capital,	River Ravensbourne LB Bromley 300m River Crane LB Hounslow 100m River Wandle LB Merton 200m Spring Brook	NONE	NONE IDENTIFIED	Naturalisation of waterways, open spaces should be encouraged.	Naturalisation where possible to increase biodiversity.

OT A CIGIN	OI ANTIGIED DATA	COMPADATORS	TABCETS	TDENDS	ISSUE IDENTIFIED	ACTION / ISSUES FOD
			CONCETO			PLAN/SA
Changes in number of conceptions to females under 18, resident in an area, per 1000 females aged 15-17 in the area, compared with the baseline year in 1998 (PAF).	2003/04 – -4.1% (Corporate Performance Plan 2004/05)	Nii.	-15% (2004/05) -20% (2005/06)	Too early to tell.	Maintain low teenage pregnancy rates.	Provision and accessibility of health care services to meet the needs of teenagers.
% of schools rated good or very good.	2002/03 – 57% 2003/04 – 64.7% (Corporate Performance Plan 2004/05)	Nii.	64% (2004/05) 67% (2005/06)	Above target.	School standards.	Maintain high education standards for schools.
LEA capacity to facilitate access to high quality services (where 1 = High and 5 = Low)	2002/03 – 3.06 2003/04 – 2.95 (Corporate Performance Plan 2004/05)	Nii.	2.5 (2004/05) 2.5 (2005/06)	Off target.	Increase LEA capacity to facilitate access to high quality services.	Assist LEA capacity to facilitate access to high quality services.
LEA commitment to promoting access to education and social inclusion (where 1 = High and 5 = Low)	2002/03 – 2.48 2003/04 – 2.69 (Corporate Performance Plan 2004/05)	Nii.	2.4 (2004/05) 2.4 (2005/06)	Way off target.	Increase LEA commitment to promoting access to education and social inclusion.	Promote social inclusion and access to educational services.
% of foundation setting rated by OfSTED as good or better.	2002/03 – 97% 2003/04 – 97% (Corporate Performance Plan 2004/05)	NII.	99% (2004/05) 99% (2005/06)	On target.	Maintain good/better OfSTED rating.	Maintain educational standards.
% of primary schools with 24% or more (and at least 30) of their places unfilled.	2002/03 – 8.6% 2003/04 – 12% (Corporate Performance Plan 2004/05)	Best England Quartile (02/03) – 8% Best London quartile (02/03) – 3%	2% (1.5%) (2004/05) 2% (1.5%) (2005/06)	Way off target.	Enrolment levels for Primary Schools	Falling enrolment levels.
% of secondary schools with 25% or more (and at least 30) of their places unfilled.	2002/03 – 8.3% 2003/04 – 0% (Corporate Performance Plan 2004/05)	Best England Quartile (02/03) – 0% Best London quartile (02/03) – 0%	0% (2004/05) 0% (2005/06)	On target.	Enrolment levels for Secondary Schools	Maintain enrolment levels.
% of 15 year-old pupils in schools maintained by the authority achieving 5 or more GCSEs at grades A-G (inc. English and maths).	2002/03 – 85% 2003/04 – 85.6% (Corporate Performance Plan 2004/05)	Best England Quartile (02/03) – 91% Best London quartile (02/03) – 91%	87% (2004/05) 88% (2005/06)	On target.	Numbers of students gaining GCSEs.	Level of skills and qualifications attained by young people.

INDICATOR	QUANTIFIED DATA	COMPARATORS	TARGETS	TRENDS	ISSUE IDENTIFIED	ACTION / ISSUES FOR
						PLAN/SA
% of pupils	2002/03 – 38.7%	Best England Quartile	42% (2004/05)	On target.	Level at which GCSEs are	Level of skills and qualifications attained
achieving 5 or more	2003/04 – 39.4%	(02/03) – 54%	43% (2005/06)		attained.	by young people.
GCSEs at grades A-		Best London quartile				
C or equivalent.	(Corporate Performance	(02/03) – 53%				
:	riail 2004/03)					
Pupils with	2002/03 – 3%	Z.	2.2% (2004/05)	Above target.	Number of students with special	Provision of assistance to special needs
statements of	2003/04 - 2.2%		2% (2005/06)		need.	students.
special educational						
need as a % of all	(Corporate Performance					
children.	Plan 2004/05)					
% of young people	2002/03 – 26.7%	Nil.	75% (2004/05)	Way off target.	Education levels of young	Education levels of young people leaving
leaving care aged			75% (2005/06)		people leaving care.	care.
16 or over with at	(Corporate Performance					
least 1 GCSE at	Plan 2004/05)					
grades A-G or						
GNVQ (interface						
indicator with						
education services).						

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
International policies			
Agenda 21 Declaration Rio de Janeiro (1992) Convention on Biological Diversity, Rio de Janeiro (1992)	Committed countries to the principles of sustainable development. The Convention came into force on 29 December 1993. It has 3 main objectives: • conserve biological diversity • sustainable use of biological diversity • fair and equitable sharing of the benefits	Sustainability principles must underpin the core strategy and its policies. This involves the integration and balancing of economic, environmental and social objectives into the core strategy.	SA objectives must ensure sustainability underpins all aspects of the core strategy. SA objectives must ensure that biodiversity conservation is adequately factored into core strategy
	of biological diversity.	Ensure that the protection and enhancement of the borough's biodiversity is accounted for in the core strategy.	policies and other DPDs.
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)	Contains the key obligation requiring the reduction in anthropogenic CO ₂ levels to at least 5% below 1990 levels by 2012.	The core strategy must contain policies that address and mitigate the impact of climate change.	Supporting programme.
The World Summit on Sustainable Development (WSSD), Johannesburg Declaration on Sustainable Development (Proponent body United Nations) 2002 Status: Statutory	Adopts a 10-year framework of programmes of action seeking to accelerate the shift towards sustainable consumption and production and reverse the trend in the loss of natural resources and biodiversity by 2010.	Reaffirmed UK commitment to sustainable development.	Supporting programme.
European Union policies			
European spatial declaration on sustainable development Proponent body European Union 1999 Status: voluntary	The aim is to work towards a balanced and sustainable development of the territory of the European Union.	Reaffirmed UK commitment to sustainable development.	Supporting programme.

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
	the Government's policy on the industrial, commercial development of small firms, underlining that development should balance economic and environmental issues.	development must ensure consistency with PPG4.	alternative uses including housing).
PPS6 Planning tor town centres	The Government's objectives for local planning authorities are that they: • ensure there is a retail hierarchy and network of town centres • sustain and enhance the vitality and viability of town centres • focus development, especially retail development, in suitable locations • maintain an efficient, competitive and innovative retail sector • ensure the availability of a wide range of shops, employment, services and facilitate easily accessible by a choice of transport.	The core strategy must adopt policies that comply with PPG 6 by ensuring: • there is a retail hierarchy and network of town centres • locations are accessible and well served by a range of transport modes • the night time economy is enhanced • a high standard of urban design and built quality.	The SA objectives should include measures that seek to achieve sustainable economic growth in Lewisham by encouraging new enterprises in suitable locations in line with sustainable design principles and the retail hierarchy.
PPS9 Biodiversity and geological conservation	Local authorities must take into account the protection of existing biodiversity and geological resources within their jurisdiction in making planning decisions	The core strategy should seek to protect and enhance the boroughs local biodiversity and geological features wherever possible.	The SA objectives should include measures to protect and enhance the borough's local biodiversity and geographical resources.
PPS10 Planning for sustainable waste management (2005)	Sets out the Government's policies on sustainable waste management and provides guidance on LDF preparation and on determining planning applications.	The core strategy must include a policy on sustainable waste management that takes local conditions into account.	The SA objectives must seek to minimise waste generation and increase recycling.
PPS12 Local spatial planning (2008)	Sets out the Government's policy on the preparation of LDFs.	The core strategy must be prepared in conformity with the requirements of PPS12.	The SA must comply with the requirements of s19(5) of the Planning and Compulsory Purchase Act 2004 and should appraise the economic, social and environmental sustainability of the plan.
PPG13 Transport (2001)	Integrate land use planning and transport at national, regional and local levels in order to promote sustainability objectives including sustainable transport, accessibility and social inclusion.	The core strategy must include policies that promote sustainable urban design principles to reduce the need for travel, increase accessibility and promote sustainable transport.	The SA objective must include measures to reduce car dependence and encourage sustainable forms of transport.

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

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
The Mayor's Cultural Strategy (2004)	The Strategy sets out the Mayor's proposals for developing and promoting cultural life in London, focusing on four key objectives: excellence, creativity, access and value.	The collective core strategy policies should aim to improve the cultural and social aspects of life in the borough.	The collective SA objectives should aim to ensure the enhancement of cultural and social growth in the borough.
London's Warming – The impacts of Climate Change (2002)	The Study aims to identify the threats and opportunities presented by climate change.	The core strategy policies should seek to complement the findings of the study.	The SA objectives should be underpinned by the overriding objective of reducing the impacts of climate change.
Streets For All: A Guide to the management of London's Streets – English Heritage (2000)	A good practice guide to street scene design, promoting excellence in materials use and workmanship to improve the urban environment and public realm.	The core strategy policies on urban design should aim to improve the quality of the borough's public realm and overall streetscape.	The SA objectives should collectively aim to result in an improvement to the borough's streetscape and public realm.
Guide to Preparing Open Space Strategies (2004)	The Guide aims to assist boroughs in producing an open space strategy and establish a common framework for benchmarking and strategic planning.	The core strategy should adopt policies on protecting open space that are in compliance with the Guide.	SA objectives should include measures to protect and enhance the quality of existing open space.
Empty Homes in London (2004)	The Report highlights the issue of empty homes London. It also sets out the current position with regard to the number of empty homes, summarises recent policy developments and gives information on the activities of the London boroughs, the Empty Homes Agency and the GLA.	The core strategy policy on housing should take into account the recommendations of this report.	SA objectives should seek to ensure that sufficient numbers of new dwellings will be provided in the borough in order to accommodate the growth in population.
The Mayor's Transport Strategy (2001) (and transport strategy revisions 2004)	The MTS details ten priority areas for transport that directly or indirectly, benefit the environment and London's community.	The core strategy policies should aim to complement the transport priorities for action set out in the Strategy.	SA objectives should contain measures that seek to reduce the need for car travel and encourage sustainable modes of transport.
The London Plan (2008)	The London Plan sets out strategic policies for spatial planning and development across London. The overall aim of the London Plan is to ensure London develops in a sustainable manner.	The core strategy policies must be consistent with the London Plan as it legally constitutes a development plan document.	The SA objectives must be in compliance with the policy objectives contained in the London Plan.
Mayor of London's Municipal Waste Management Strategy	The overall objective of the strategy is to reduce London's waste generation by 2020 and to sustainably manage the waste that is created. Waste reduction targets are detailed in the strategy.	The core strategy should contain a policy on waste management that ensures compliance with the London Plan and also ensures that the objectives of the waste hierarchy.	The SA objectives must include measures that seek to reduce waste production and sustainably manage waste.

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Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Lewisham Local Cultural Strategy (2002)	The aim of the strategy is to promote the cultural well being of the area.	The core strategy should include a policy that seeks to promote local cultural diversity in the borough	The SA objectives should contain measures that promote the borough's cultural diversity as part of an overall promotion of a sense of community identity and welfare.
Lewisham Regeneration Strategy 2008-20	The strategy details twelve objectives that relate to three broad themes - people, prosperity and place. The strategy for regeneration also complements the SCS.	The core strategy should contain regeneration policies that complement the borough's regeneration strategy and the SCS as part of a coherent strategic policy approach.	The SA objectives should contain objectives that seek to ensure the sustainable development of the borough. This includes measures that seek to promote sustainable regeneration in suitable locations.
Lewisham Local Area Agreement (LAA) 2009	The LAA is an agreement with central government that establishes 35 indicators and targets which address the key inequalities that exist in Lewisham. The LAA is a key delivery mechanism of the SCS.	The core strategy should broadly complement the objectives of the SCS.	SA objectives should broadly complement the achievement of the LAA indicators.
Lewisham Town Centre Management Strategy	The overall objective is to promote the viability and vitality of the borough's town centres through a holistic approach to local economic development.	The core strategy should reflect the objectives of the Strategy in order to produce a coherent planning policy outcome.	SA objectives should include measures to promote economic development across the borough, which will in turn promote employment and attract new enterprises to the borough.
Healthier Communities – A health and well-being framework for Lewisham	The Strategy aims to complement the achievement of LAA objectives and improve health outcomes for Lewisham residents by adopting preventative measures and innovative approaches.	The core strategy should be in compliance with the objectives of the SCS and its delivery mechanism the LAA.	The SA objectives should contain a measure seeking to enhance the health levels in the borough.
Lewisham Physical Activity, Sport and Leisure Strategy (2007-12)	The Strategy provides a framework for activity and development in Lewisham. It has three key aims: • increase participation in physical activity and sport • enable the Lewisham community to develop its potential in sport • develop appropriate infrastructure.	The core strategy should contain policies that seek to promote active lifestyles in the borough by protecting and maintaining open spaces and improving the quality of sports facilities in the borough.	The SA objectives should contain a measure seeking to enhance the health wellbeing levels in the borough.

Other relevant plans and	Key objectives and targets relevant to	Implications for the DPD	Implications for the SA/SEA
Social Inclusion Strategy 2005-13	This strategy centres around five broad themes. It identifies the links between the council's existing strategies and services to enable more joined-up working.	Social sustainability must be a key element in the core strategy. Enhancing social inclusion is a key aspect of social sustainability. This requires the promotion of sustainable transport and accessibility for all, implementing good urban design principles and the promotion of health, well being and education for all in the community. Good urban design principles will also enhance social inclusion.	The SA objectives should contain measures to promote social inclusion, measured by the core strategy's efforts at improving urban design, transport, education and promoting health and well-being in the borough
Local Biodiversity Action Plan – A Natural Renaissance For Lewisham • Foundation for individual Biodiversity Action Plans highlighting locally important plants, animals, habitats • Plans provide detailed information to supplement planning and development decisions, and allow for monitoring of progress	The key objective is the protection and enhancement of areas suitable for wildlife in the borough and to increase citizens' access to nature, even in urban areas.	The core strategy should aim to protect and enhance local biodiversity across the borough, including in urban areas and areas that are set for regeneration.	The SA objectives should contain a measure to protect and enhance biodiversity across the borough.
Lewisham Leisure and Open Space Study 2009	 This strategy aims to provide: a PPG 17 compliant review a borough playing pitch strategy an implementation and prioritised investment plan for the Playing Pitch Strategy. 	The core strategy should include policies on open space to ensure: • adequacy and quality of Open space (distribution) • protection of open space and biodiversity from development and enhancement where possible enhancement of open spaces (MOL, PoS, UGS).	The SA objectives should include measures to protect and maintain open spaces and biodiversity across 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.	The core strategy should be in compliance with the London Plan targets on housing and housing tenure.	SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.
Brighter futures: Lewisham's Homelessness Prevention Strategy 2009-2014 (DRAFT- June 2009)	The Strategy complements the objectives of the Lewisham Housing Strategy. Key priorities include: • preventing homelessness arising where	The core strategy should be in compliance with the latest London Plan targets on housing and housing tenure. The London Plan sets a high	SA objectives should contain measures providing sufficient housing of appropriate quality, mix and tenure.

Other relevant plans and	Key objectives and targets relevant to	Implications for the DPD	Implications for the SA/SEA
programmes	the DPD		
	 possible and promoting housing options providing long term and sustainable housing protecting and providing support for vulnerable adults and children who are homeless or faced with homelessness promoting opportunities and independence for people in housing need by improving access to childcare, health, education, training and employment reducing Youth Homelessness. 	affordable housing target that should help meet the objectives of the Strategy.	
Lewisham Children and Young People's Plan 2009-2012	The Plan focuses on implementing actions to improving a number of key outcomes for children and young people which will improve their lives and life chances.	The core strategy must include policies on education, health and well being, employment, open space and community facilities that will improve the life prospects for the borough's young people.	The SA objectives must include measures that will improve the life outcomes for residents – these can include measures on promotion of education, employment, housing and leisure and community facilities.
Creative Lewisham – Lewisham Cultural and Urban Development Commission	The report details a vision of Lewisham as a visually exciting, creative and imaginative hub, creating a synthesis between urban design, arts, culture and the economy.	The core strategy should seek to adopt best practice urban design principles that will maximise sustainability in the borough.	SA objectives as a whole should include measures that will result in a vibrant and dynamic borough.
Safer Places: The planning system and crime prevention	The report offers advice on planning considerations relating to crime prevention. It establishes design principles for all new development which seek to reduce crime and the risk of crime.	The core strategy should include a policy promoting best practice urban design principles that among other things aim to design out crime.	The SA objectives should contain measures that seek to reduce crime and other anti-social behaviour.
Environmental protection			
Lewisham Environmental Policy / Statement 2002	The Statement aims to: • reduce Lewisham's contribution to climate change by reducing the use of fossil fuels • reduce depletion of biodiversity and resources through goods / services purchased • reduce, re-use or recycle solid waste • improve local air quality and reduce	The core strategy must adopt environmental policies that comply with or exceed regional or national statutory requirements.	SA objectives should include measures that promote:

Other relevant plans and programmes	Key objectives and targets relevant to the DPD	Implications for the DPD	Implications for the SA/SEA
Lewisham Employment Land Study (2008)	This study assesses the future demand for employment land, compares it with the land supply under current planning policies and in light of the council's preferred spatial options makes policy recommendations on how far existing employment sites should be safeguarded from redevelopment for other uses.	This study forms part of the evidence base for the core strategy. The findings of the study must support the adopted core strategy policies.	The SA objectives should include a measure that encourages and promotes the development of employment opportunities in the borough over the long term.
Health, Well-Being and Care – Lewisham Joint Strategic Needs Assessment (JSNA)(2009)	The report is the result of a joint collaboration between the Council and Lewisham Primary Care Trust(PCT). The JSNA identifies key themes for action aimed at improving long term health in the borough. This will allow the LSP and its individual partners to identify existing and future health needs of the borough and will influence the long term commissioning priorities of health infrastructure providers in the borough.	The JSNA will inform the development of the core strategy spatial development policies.	The SA objectives should include a measure that seeks to improve the health an dwell-being of the borough's residents.
Lewisham Retail Capacity Study (2009)	The Study assesses the existing and future supply and the capacity for additional retail floorspace within the borough and the role played by each of the nine Major and District Town Centres.	This study forms part of the evidence base for the core strategy. The findings of the study must support the adopted core strategy policies.	The SA objectives should include a measure that seeks to attract new investment and maximise sustainable economic growth in the borough.

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