



Development Management Local Plan

Further Options Report

December 2012

Copy for public consultation

Development Management Further Options

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Have your say

Lewisham Council wants to hear your views on this Development Management Local Plan Further Options document. The document contains policy options and alternatives that once adopted, will be used in the assessment and determination of relevant planning applications. It has been prepared using local research, responses from previous rounds of consultation and considers the changes made to the national planning system.

Following your feedback, the Council will decide what policy options, alternatives or other suggestions that may come forward from this consultation, are carried through for inclusion in a draft plan. There will then be another round of consultation and a chance to comment before the final plan is prepared in 2013.

This document has been prepared following the adoption of the Lewisham Core Strategy and supports its implementation. It will form part of the Lewisham Local Plan.

When reading this document please consider the following key questions.

1. Do you have any comments on the Council's recommended or alternative policy options?
2. Are there other policy options and/or an alternative that you would like to suggest?
3. Do you have any comments on the justification that supports the recommended option?
4. Do you have any other comments on this document?
5. Do you have any comments on the accompanying Sustainability Appraisal?

How do you get involved?

All comments relating to this Development Management Local Plan Further Options document and the accompanying Sustainability Appraisal can be sent to the Council as follows:

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

E-mail: planning.policy@lewisham.gov.uk with 'Development Management Local Plan Further Options' as the subject

Post: Planning Policy, Planning Service, London Borough of Lewisham, Laurence House, 1 Catford Road, London, SE6 4RU

Fax: 020 8314 3127

Please send comments by 17:00 on Thursday 31 January 2013.

Comments received after this date are unlikely to be considered.

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1.1 The story so far...

- 1.1** The Lewisham Development Management Local Plan (DMLP) will set out the Council's planning policies for managing development in the London Borough of Lewisham and will be used to guide, assess and determine planning applications. The plan will support the implementation of the Lewisham Core Strategy and The London Plan and should be read alongside the Site Allocations Local Plan, the Lewisham Town Centre Local Plan and any Council supplementary planning documents (SPDs).
- 1.2** This further options stage is the third round of public consultation for the Development Management Local Plan and follows on from the preferred options consultation in 2007. The further options stage is being undertaken in the consideration and context of:
- adoption of the Core Strategy in June 2011
 - preparation of a separate Site Allocations Local Plan rather than a combined plan with the development management policies (as was the case in 2007)⁽¹⁾
 - A review of the planning system by the Government and the publication of a National Planning Policy Framework (NPPF)⁽²⁾
 - Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.⁽³⁾
- 1.3** This document seeks your views on:
- the **development management topics** that have been identified by the Council
 - the **Council's recommended policy options**
 - the **alternative options** suggested and
 - whether **other policy issues or topics** need to be included as part of the draft plan.

Development Management Further Options

This document is not a draft or final plan but shows the recommended policy options the Council could include as part of the final Development Management Local Plan, together with the reasonable alternatives that are being considered.

The purpose of the further options stage is to ensure that anyone who is interested, particularly residents and businesses, has the opportunity to not only comment on what options could be taken forward, but also on any alternative options being considered, and the various evidence reports used to justify the Council's position.

Each policy option and the alternative is open to comment and has been the subject of a sustainability appraisal and strategic environmental assessment (SA). All representations on this document and the SA will be considered when preparing the draft and final versions of the plan. It will then need to be submitted to Government for independent examination and if found sound, the plan can then be adopted by the Council.

1 The Site Allocations Local Plan was submitted to the Secretary of State for an independent Examination in Public on 28 September 2012

2 The NPPF came into force on 28 March 2012 and replaces most national Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)

3 This outlines the procedures for the preparation of a local plan, prior to its publication (the draft plan)

1.2 What is development management?

- 1.4** The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development. The Council sees development management as a positive and proactive approach to shaping, considering, determining and delivering development proposals. The emphasis is on collaboration instead of negotiation; coming to a balanced agreement which solves problems rather than a compromise which doesn't meet everyone's objectives.
- 1.5** The process is led by the local planning authority (London Borough of Lewisham), working closely with those proposing developments and others particularly the local community. It is undertaken in the spirit of partnership and inclusiveness, and supports the delivery of key priorities and outcomes. The policies to be included within the Development Management Local Plan positively promote sustainable development and help implement the Core Strategy.
- 1.6** It is important to note that development management retains the established practice of proper consideration and transparent determination of planning applications and does not mean allowing unacceptable development.

1.3 Local Plan preparation

- 1.7** The National Planning Policy Framework (NPPF) came into force in March 2012 and requires the Council to prepare a local plan, which reflects the priorities of their local communities.⁽⁴⁾

*A **Local Plan** is 'the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.'*⁽⁵⁾

- 1.8** The Council is preparing a number of development plan documents that in combination will comprise the Local Plan for the borough. To signify that a development plan document forms part of the Local Plan, it will be called a Local Plan, e.g. Development Management Local Plan. In time, the completed Local Plan will replace the saved policies contained in the Lewisham Unitary Development Plan (UDP)⁽⁶⁾ The Council began this process in 2005 and the principal planning document for Lewisham is the Core Strategy adopted by the Council on 29 June 2011. The Core Strategy sets out the borough's overall planning vision and strategy to manage development and regeneration in the borough for the period 2011 to 2026 as well as strategic policies to guide development proposals.
- 1.9** For Lewisham, the Local Plan includes the following documents.
- Core Strategy (adopted)
 - Site Allocations Local Plan (submitted to the Government for approval)
 - Lewisham Town Centre Local Plan (submitted to the Government for approval)
 - Catford Town Centre Local Plan (further options to be consulted early 2013)

4 Paragraph 1, NPPF

5 Glossary, NPPF

6 Adopted July 2004

- Development Management Local Plan (under preparation) and
- Saved policies in the Lewisham Unitary Development Plan (to be replaced by the above documents).

The **Development Management Local Plan** (DMLP) will provide further detail to the Core Strategy policies to support its implementation. The objectives of the DMLP are as follows.

1. To facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the Core Strategy's strategic objectives.
2. To facilitate development which protects and enhances the amenity of the local area.
3. To ensure a high standard of design.
4. To create safe, attractive, accessible and functional environments for all.
5. To secure development that helps create a more sustainable Lewisham and facilitates its positive impact on health and well-being.

1.10 The development management policy options and the alternatives put forward are consistent with, and derived from, the following sources:

- National planning policy
- London Plan policies
- Lewisham Core Strategy policies
- Saved UDP policies
- Relevant local issues which can be addressed through the planning system.

1.11 In preparing the DMLP it must be remembered that there are certain parameters within which the Council must operate. These parameters are outlined in national and regional planning policy and strategy, which combine to determine the local planning policy context and the available options and alternatives that can be put forward. Lewisham's approach must be:

- in line with national policy, specifically the NPPF
- in general conformity with the regional strategy, the London Plan
- implement the Core Strategy objectives and policies and
- be supported by local evidence.

1.12 It needs to be recognised that there are certain policy issues that need to be included. However, in certain instances, evidence has been used to justify a locally distinctive approach for Lewisham. The requirements for Lewisham are summarised below.

| | |
|--------------------------|--|
| National planning policy | The role and format of the DMLP will accord with planning legislation ⁽⁷⁾ and be consistent with the NPPF, which sets out the government's planning policies for England and how they are expected to be applied. The focus of the NPPF is a presumption in favour of sustainable development and positive growth. The NPPF must be taken into account in the preparation of local plans and is underpinned by its 12 core planning principles. |
|--------------------------|--|

7 Such as The Localism Bill and the Town and Country Planning (Local Planning) (England) Regulations 2012

| | |
|--------------------------------|---|
| London Plan | The London Plan provides a framework for managing London's growing population. It has important implications for the DMLP as it sets out London-wide policies (including targets) for housing, transport, employment and the environment that need to be reflected at the borough level. The DMLP will need to be 'in general conformity' with the contents of the London Plan. ⁽⁸⁾ |
| Sustainable Community Strategy | The Local Plan implements certain aspects of the vision outlined in Lewisham's Sustainable Community Strategy 2008-2020, titled Shaping the Future. ⁽⁹⁾ Lewisham has many other strategies and programmes that need to be taken into account to show how these may influence the use of land in the borough to bring about positive change, particularly for the benefit of the local community. |
| Lewisham Core Strategy | The Lewisham Core Strategy is the borough's principal planning document and was adopted in June 2011. The DMLP must align and implement relevant Core Strategy objectives and policy priorities. Justification for many of the policy options and alternatives already been made through the Core Strategy. However, in ensuring locally distinctive options and alternatives, the Council has referred to its extensive evidence base. |
| Public consultation | The DMLP must be the subject of consultation with local residents and a wide range of interested local and community groups. This includes landowners, developers, government departments and agencies, neighbouring boroughs and other individuals and organisations. In preparing the DMLP to date, the Council has followed the statutory consultation process outlined in its Statement of Community Involvement. In preparing this further options document, the Council has considered feedback received at the 2005 and 2007 consultation stages. The Council's response to the Issues and Options and the Preferred Options consultations is available in a separate report. It needs to be noted that much has changed since that time and as such new and revised policy options and alternatives are presented – all of which are now open for comment and review. |
| Sustainability appraisal | In line with EU and national requirements, a sustainability appraisal (SA) (incorporating a Strategic Environmental Assessment) has been undertaken alongside the policy options and alternatives. The overall aim is to ensure that the preparation of the DMLP contributes to the achievement of sustainable development. This has involved a separate and concurrent evaluation of the options and alternatives. The SA highlights the key social, economic and environmental impacts and identifies mitigation and avoidance measures to ensure effective implementation. A summary of the appraisal results |

8 The London Plan, July 2011

9 Section 4 of the Core Strategy explains this in more detail

| | |
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| | has been included in this document. The SA has contributed towards the reasoning and refinement of the policy options and relevant sections from the SA have been included throughout this document to justify an approach. The SA is also subject to public consultation and comments can be made on its findings. |
| Equality Analysis Assessment | An Equalities Analysis Assessment (EAA) will be prepared as part of draft DMLP following consultation on the further options document. An EAA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of a policy for different groups in the community. Local authorities have a duty under race, disability and gender legislation to carry out an EAA of their Local Plans. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EAA will highlight key issues needing further consideration and the recommendations will be used in the preparation of the draft policies. |
| Evidence base | It is necessary to have up-to-date, relevant and reliable data on current and future issues. As such, since the Preferred Options consultation in 2007, the Council has commissioned or prepared a number of studies and reports, several of which support the policy options put forward. Where necessary, reference is made to the appropriate evidence base documents. A comprehensive list is provided in Appendix 1. |

1.4 Commenting on this document

1.13 The DMLP Further Options document is structured as follows:

- Section 2 sets out the policy options and alternative options for development management issues.
- Section 3 outlines the next steps in preparing the draft and final versions of the plan and how you can continue to be involved.
- Appendices provide background and additional information.

1.14 In reading this document there are several questions the Council would like you to consider when thinking about each policy option and the alternative that is presented.

Question 1

Do you support the Council's recommended option for inclusion in the draft DMLP?

Question 2

Are there any additional issues that need consideration?

Question 3

Is there another feasible policy option having regard to the alternative?

1.5 What are the next stages?

1.15 The stages for the ongoing preparation of the DMLP are set out below with provisional timings.

| KEY STAGE | DATE |
|---|--------------------------------|
| Consultation on the Council's further options and associated SA. <i>This is the current stage</i> | December 2012 and January 2013 |
| Public consultation on a pre-submission or draft plan | July 2013 |
| Submit DMLP to the Government for approval | November 2013 |
| Examination in Public , where the document is assessed by an independent Planning Inspector | January 2014 |
| Publication of the Inspector's report with any recommended changes | March 2014 |
| Adoption of Development Management Local Plan by Lewisham Council | May 2014 |

- 2.1 Section 2 outlines the **recommended policy options** being considered by the Council for inclusion in the draft and final DMLP and where appropriate any **alternative** that could also address the identified issue. Once adopted, the final policies will supplement those in the Lewisham Core Strategy and the London Plan and will be used to guide, assess and determine relevant planning applications.

2.1 Implementing the Core Strategy

- 2.2 The following provides a summary of the four main Core Strategy strategic objectives and the key considerations that are outlined for each recommended policy option and alternative for the DMLP. The four objectives are:

- Providing new homes
- Growing the local economy
- Environmental management
- Building a sustainable community

- 2.3 In order to accommodate growth and manage development in accordance with the Core Strategy vision the Council will seek to ensure the implementation of the following strategic objectives.

1. PROVIDING NEW HOMES

- 2.4 This section deals with policy options that can address issues relating to housing. The options will implement the following Core Strategy strategic objectives and policies.

- Objective 1 by contributing to regeneration and facilitating development
- Objective 2 by addressing housing need
- Policy 1 Housing provision, mix and affordability.

- 2.5 Core Strategy Policy 1 (CSP1) provides a clear and comprehensive policy on housing provision, mix and affordability. The key policy directions are:

- ensuring no net loss of housing and housing built to appropriate local densities in accordance with the London Plan
- seeking 50 per cent affordable housing on sites capable of providing 10 or more dwellings, subject to financial viability
- provision of mixed tenure developments to provide market, intermediate (shared ownership) and affordable housing
- provision of family housing (3+ bedrooms), Lifetime Homes and wheelchair accessible housing
- ensuring a mix in dwelling types and sizes across all tenures.

- 2.6 However, CSP1 does not provide specific detail for the following issues where options and alternatives have been provided.

- Prevention of loss of existing housing (DM Option 2)
- Conversion of a single residential house to more than one dwelling (DM Option 3)
- Sheltered housing and care homes (DM Option 4)
- Houses in multiple occupation (DM Option 5)
- Affordable rent (DM Option 6)
- Student housing (DM Option 7).

2. GROWING THE LOCAL ECONOMY

2A. Employment

This section deals with policy options that can address issues relating employment land in the borough. These are the areas of land in largely office, workshop/industrial and warehousing or storage use. The improvement of the economy is a key issue for the borough. The Core Strategy sets out a range of employment locations to provide and protect land and buildings for strategic and local economic needs. The options will implement the following Core Strategy strategic objectives and policies.

- Objective 1 by contributing to regeneration and facilitating development
- Objective 4 by increasing economic growth and local employment opportunities and enhancing district and local centres
- Policy 3 Strategic Industrial Locations and Local Employment Locations
- Policy 4 Mixed Use Employment Locations
- Policy 5 Other employment locations.

2.7 The Government's objective for the economy is set out in the NPPF. Of relevance to the DMLP is the need for flexible policies to accommodate new economic needs and new business clusters, to support existing business sectors and to be flexible enough to accommodate needs not anticipated in the plan and to allow rapid response to changes in economic circumstances and to not allocate or protect employment land that is no longer required for these purposes.

2.8 Core Strategy Policy 3 sets out protective policies for Strategic Industrial Locations (identified in the London Plan as being of strategic importance for the wider London economy) and Local Employment Locations which provide land for more locally important uses. Core Strategy Policy 4 sets out a policy for Mixed Use Employment Locations which allow the mixed use development of poorer quality industrial sites in the Regeneration and Growth Areas in Deptford and New Cross. Core Strategy Policy 5 sets out a framework for the smaller premises in employment user scattered throughout the borough.

2.9 The DMLP policy options provide further detail to ensure:

- how the proportion of B Use Classes will be maintained in the Mixed Use Employment Locations (DM Option 8)
- suitable uses and space are provided in the Local Employment Locations (DM Option 9) and
- suitable uses are retained or replaced for the 'undefined' or other employment locations (DM Option 10).

2.10 There are no policy options for Strategic Industrial Locations provided in this document as this land use is comprehensively covered in the London Plan and the Lewisham Core Strategy.

2B. Retail and town centres

This section deals with policy options that can address issues relating to town centres, smaller shopping areas and the range and types of uses that take place in these areas. The options will implement the following Core Strategy strategic objectives and policies.

- Objective 1 by contributing to regeneration and facilitating development
- Objective 4 by increasing economic growth and local employment opportunities and enhancing district and local centres
- Policy 6 Retail hierarchy and the location of retail development.

- 2.11** The Council recognises it has an important role to play in encouraging and sustaining retailing and town centre development. It must provide an adequate framework to enable the retail industry to establish and maintain appropriate town centre services and facilities in a way that meets both the objectives of Government's policy, the needs of retail business and importantly the needs of the local community.
- 2.12** The Government's objective for planning in town centres is set out in the NPPF. Planning policies should promote competitive town centre environments and set out a range of policies for the management and growth of centres over the plan period. This includes but is not limited to supporting vitality and viability, promoting competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres,
- 2.13** Core Strategy Policy 6 (CSP6) sets out the borough's town centre hierarchy and location of retail development. This is justified by the Lewisham Retail Capacity Study (2009) and its supplementary report (2010) prepared by Nathaniel Litchfield and Partners. However, CSP6 does not address the following issues which are detailed below.
- Town centre vitality and viability (DM Option 11)
 - Protecting shopping frontages in Major and District Centres (DM Options 12, 13)
 - Protecting a range of essential shops in smaller shopping areas including local parades (DM Options 14, 15)
 - Specific requirements for the location and management of certain town centre uses, such as food and drink outlets, mini cab offices and shopfronts (DM Option 16, 17, 18, 20)
 - Protection of public houses (pubs) (DM Option 19).

3. ENVIRONMENTAL MANAGEMENT

- 2.14** This section deals with policy options that can address issues relating to climate change and environmental management. The options will implement the following Core Strategy strategic objectives and policies.
- Objective 5 by creating a low carbon borough and reducing carbon emissions
 - Objective 6 by reducing flood risk and improving water quality
 - Objective 7 by protecting and capitalising open spaces and environmental assets
 - Objective 11 by strengthening the quality of life and well-being
 - Policy 7 Climate change and adapting to the effects
 - Policy 8 Sustainable design and construction and energy efficiency
 - Policy 9 Improving air quality
 - Policy 10 Managing and reducing the risk of flooding
 - Policy 11 River and waterways network
 - Policy 12 Open space and environmental assets.
- 2.15** Core Strategy Policy 7 seeks to ensure Lewisham makes an adequate contribution to climate change by implementing the principles of 'avoidance, mitigation and adaptation' to reduce Lewisham's CO₂ emission through a partnership approach.
- 2.16** Core Strategy Policy 8 aims to reduce Lewisham's CO₂ emission and the environmental impacts of all new developments by improving energy standards and other sustainability aspects, including compliance with the Code for Sustainable Homes and BREEAM standards.

- 2.17** Core Strategy Policy 9 seeks to improve Lewisham's air quality and minimise any negative air quality impacts by supporting the actions outlined in the Council's Air Quality Management Plan, including working with Transport for London and all businesses to manage and improve air quality.
- 2.18** Core Strategy Policy 10 aims to manage and reduce the risk of flooding in new development through the use of sustainable urban drainage systems, living roofs and walls and sustainable design and construction.
- 2.19** Core Strategy Policy 11 seeks to preserve and enhance the water quality, landscape, biodiversity, amenity, historical and recreational and health benefits of rivers and waterways.
- 2.20** Core Strategy Policy 12 aims to protect and enhance the natural environment and to tackle climate change, including improving existing and new public open space with better quality, quantity and accessibility for all.
- 2.21** However, further policy requirements are considered necessary for the following matters:
- further guidance on sustainable design and construction issues for domestic and non-residential uses (DM Option 21)
 - Air Quality Management Areas (AQMAs) (DM Option 22)
 - living roofs and walls (DM Option 23)
 - landscaping and trees (DM Option 24)
 - noise and vibration issues (DM Option 25)
 - lighting design and installation (DM Option 26)
 - land contamination (DM Option 27).

4. BUILDING A SUSTAINABLE COMMUNITY

This section deals with policy options that can address the issues relating to building a sustainable community.

4A. Sustainable movement and transport

The options identified will implement the following Core Strategy strategic objectives and policies

- Objective 9 by contributing to integration, accessibility and connectivity in the borough
- Policy 14 Sustainable movement and transport

- 2.22** The Core Strategy Policies provide clear and comprehensive policy for transport issues. The key policy direction is to provide and promote sustainable transport, including public transport, reducing the need to travel particularly by the private car and to improve the walking and cycling environment. However, the Core Strategy does not address car parking requirements for specific localities or requirements for motorcycle parking (DM Option 28).

4B. High quality design for Lewisham

- 2.23** This section deals with policy options that can address issues relating to promoting high quality design. The options will implement the following Core Strategy strategic objectives and policies.
- Objective 1 by contributing to regeneration and facilitating development
 - Objective 3 by providing a mix of dwelling sizes and types including family housing, Lifetime Homes and bringing vacant dwellings back into use
 - Objective 10 by protecting and enhancing Lewisham's character

- Objective 11 by reducing crime and the fear of crime through innovative design
- Policy 15 High quality design for Lewisham
- Policy 16 Conservation areas, heritage assets and the historic environment.

2.24 The Core Strategy sets out the local framework for development and regeneration of the borough and for the consideration of design issues based on the differing aims set out for the four Spatial Strategy Areas and identified local characteristics. Core Strategy Policy 15 (CSP15) explicitly states that national policies, and the policies in the London Plan will be applied to ensure the highest design quality for development in Lewisham.

2.25 The challenge for the DMLP will be to add value to a range of policies in the NPPF, the London Plan and the Core Strategy itself. A limited suite of policies is proposed which deal with more detailed design issues, and the locally prepared evidence base on character areas in Lewisham while reflecting and linking in to the London Plan policies at a more local level.

2.26 High quality design is considered central to achieving sustainable development in the borough. A great emphasis is placed on achieving development that contributes to good place-making by considering wider issues such as how the development will contribute to the overall functioning of a place, how it connects with or complements its context, and to the health of the community by providing development that is sustainable in the long term.

2.27 The Core Strategy sets out a Regeneration and Growth Area for Lewisham, Catford, New Cross and Deptford that promotes development on a number of large strategic sites. Developers of these sites will need to consider the way the new development on these sites will interact in order to achieve the coherence, create new and stimulating developments that contribute to a sense of community, create new urban quarters. These policies will provide an appropriate framework for achieving this, but it should be emphasised that all forms of development will be required to provide an appropriate response to the context in which it is located. For example the design of development in town centres should ensure that walking and cycling is supported by the creation of generous public routes and pavements and that connections between the town centres and surrounding residential communities are enhanced. Small residential developments and alterations to buildings should respond to the street context particularly where there are strong unifying design elements. In order to achieve high quality design for significant development proposals early discussions will be encouraged and involve specialist design staff and a design review panel.

2.28 The DMLP policy options include:

- the design of residential environments and dwellings covering :
 - urban design and local character (DM Option 29)
 - alterations and extensions to buildings DM Option 30)
 - minimum floorspace requirements for houses and flats and flat conversions DM Option 31)
 - infill, backland and garden development DM Option 32)
- requirements for the Thames Policy Area identified in the London Plan (DM Option 33)
- public realm and street furniture (DM Option 34)
- conserving the value and significance of Lewisham's historic environment - conservation areas, listed buildings and other non designated heritage assets (DM Options 35, 36, 37)
- masts and telecommunications (DM Option 38) and
- Public conveniences (DM Option 39).

4C. Community services

2.29 This section deals with options that can address issues relating to the provision, protection and enhancement of a range of community services and facilities. The options will implement the following Core Strategy strategic objectives and policies.

- Objective 11 by protecting and enhancing public and community facilities.
- Policy 19 Provision and maintenance of community and recreational facilities
- Policy 20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles

2.30 The key policy directions are:

- ensuring a range of community services are protected and provided, including health care, education and recreation and
- securing planning obligations to meet anticipated demand arising from new development.

2.31 However, the Core Strategy does not address the following issues in which are detailed below.

- Community facilities (DM Option 40)
- Nurseries and childcare (DM Option 41)
- Art, culture and entertainment facilities (DM Option 42) and
- Places of worship (DM Option 43).

Possible options, justification and alternative options

2.32 Having regard to the previous rounds of consultation, pre-consultation with community groups and businesses, national and regional policy, and the evidence base, the Council is considering the following options for inclusion as part of the draft DMLP. A justification for each option follows and where appropriate an alternative is provided. Each option and alternative is open for comment and additional options can be put forward as part of this consultation.

2.33 The following information is provided for each policy option:

| | |
|--------------------------------------|--|
| The aim of the policy option | This identifies the issue being addressed and why a policy is necessary. |
| Recommended policy option | The option that could be carried forward and developed into a final policy for inclusion in the draft and final plan. |
| Justification for the policy option | Having regard to national and regional policy, strategy and guidance, local evidence, other council documents, and the Sustainability Appraisal. |
| Discussion of any alternative option | In light of local evidence, previous consultation responses and the sustainability appraisal. |

2.2 Promoting health and wellbeing

2.34 The NPPF presumption in favour of sustainable development highlights the importance of achieving social, economic and environmental objectives, all three of which involve health issues and influence health outcomes. Thirteen sections within the NPPF support the delivery of sustainable development and section 8, entitled *Promoting healthy communities*, focuses specifically on the important role that the planning system can play in facilitating social interaction and creating healthy, inclusive communities (paragraph 69). Local Planning Authorities should create a shared vision with communities of the residential environment they wish to see. Local policies should promote opportunities for meeting through mixed use development, strong neighbourhood centres and active street frontages; safe and accessible environments and developments. A range of social, recreational and cultural facilities and services should be delivered including school places and access to quality open spaces.

2.35 NHS London's Healthy Urban Development Unit (HUDU) produced a report and checklist entitled *Watch out for health* (2009) to ensure that health and well-being is properly considered in the planning process. The report details both direct and wider, indirect influences, many of which are already considered and embedded by Lewisham's Core Strategy policies (CSP), the London Plan and Lewisham's Residential Standards SPD, as detailed below.

2.36 Direct influences include:

- **Housing:** CSP1 Housing provision, mix and affordability, CSP7 Climate change and adapting to the effects, CSP8 Sustainable design and construction and energy efficiency, Residential Standards SPD and the London Plan (Chapter 3).
- **Access to public services:** CSP19 Provision and maintenance of community and recreational facilities and CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
- **Opportunities for physical activity:** CSP12 Open space and environmental assets, CSP14 Sustainable movement and transport and the Residential Standards SPD.
- **Air quality, noise and neighbourhood amenity:** CSP7 Climate change and adapting to the effects, CSP8 Sustainable design and construction and energy efficiency, CSP9 Improving air quality, CSP12 Open space and environmental assets, Residential Standards SPD and the London Plan.
- **Accessibility and transport:** CSP14 Sustainable movement and transport, Residential Standards SPD and the London Plan.

2.37 Wider, indirect influences are also discussed and these include:

- **Crime reduction and community safety:** Core Strategy Spatial Policies 1-5, CSP4 Mixed Use Employment Locations, CSP15 High quality design for Lewisham.
- **Food access:** CSP12 Open space and environmental assets, CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
- **Access to work:** CSP3 Strategic Industrial Locations and Local Employment Locations, CSP4 Mixed Use Employment Locations, CSP5 Other Employment Locations, CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
- **Social cohesion and social capital:** CSP1 Housing provision, mix and affordability, CSP19 Provision and maintenance of community and recreational facilities.
- **Resource minimisation:** Core Strategy Spatial Policies 1-5, CSP8 Sustainable design and construction and energy efficiency, CSP15 High quality design for Lewisham.
- **Climate change:** CSP7 Climate change and adapting to the effects, CSP10 Managing and reducing the risk of flooding, CSP12 Open space and environmental assets, CSP14 Sustainable movement and transport.

2.38 At a local level, joint strategic needs assessments (JSNA) assess the health needs of a local population in order to inform policies and services that will improve the health and wellbeing of individuals and communities. Based on Lewisham's JSNA evidence for particular issues and areas of concern for the health of Lewisham's residents, nine priority outcomes have been identified as follows:

1. Increasing immunisation
2. Reducing the uptake and numbers of people smoking
3. Reducing alcohol misuse
4. Promoting healthy weight
5. Improving mental health and wellbeing
6. Improving sexual health
7. Delay and reduce the need for long term care
8. Reduce emergency admissions for long term and chronic conditions
9. Increase survival rates for colorectal, breast and lung cancer for 1 and 5 years.

2.39 One of the five objectives of the DMLP is *"to secure development that helps create a more sustainable Lewisham and facilitates its positive impact on health and well-being"*. The DMLP recommended policy options support this objective, add detail to the Core Strategy policies and provide further guidance as needed to ensure health and well-being are properly considered in decision making. The way the DMLP recommended policy options relate to HUDU's direct and indirect influences and to the JSNA nine priorities are detailed below:

- DM Option 1 supports the NPPF presumption in favour of sustainable development. The economic, social and environmental roles all influence health outcomes.
- Housing policy options (DM Options 2 – 7) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.
- Retail policy options (DM Options 11 - 15) direct significant development to town centres while also protecting accessible local shops. These policy options protect shopping areas as the heart of communities and encourage walking and cycling which supports a reduction car use.
- DM Option 17 - Take aways, limits access to unhealthy foods which can reduce obesity levels and associated health concerns.
- Environmental policy options (DM Options 21, 22, 23, 24, 25, 27 and 29) all contribute to improving Lewisham's living environment and enabling access to natural areas which positively impact on the community's health and wellbeing.
- DM Option 28 - Car parking, encourages public transport in appropriate locations which can help reduce air pollution and congestion and encourage physical exercise, through walking and cycling.
- DM Option 29, relating to general design and local character, and DM Option 18, looking at the design of shopfronts, promote an aesthetically appealing Lewisham which can contribute to community wellbeing.
- DM Option 31, focuses on housing design and space standards and specifically mentions the application of Lifetimes Homes and Wheelchair Housing standards.
- DM Options 40, 41, 42, and 43 promote access to community facilities and services such as community facilities, nurseries and childcare, and places of worship, which can contribute to community cohesion and wellbeing.

2.3 Presumption in favour of sustainable development

- 2.40** The NPPF states that Local Plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally (paragraphs 14 and 15). To support this approach, all policies in the Development Management Local Plan (once adopted) should be read in the context of Policy 1 Presumption in favour of sustainable development.

Council's recommended option 1

Presumption in favour of sustainable development

1. When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will work proactively with applicants to find solutions which mean that proposals secure development that improves the economic, social and environmental conditions in the borough.
2. Planning applications that accord with the policies in the Lewisham Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
3. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise, taking into account whether:
 - a. any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole or
 - b. specific policies in that Framework indicate that development should be restricted.

Context

- 2.41** The focus of the NPPF is on a presumption in favour of sustainable development and positive growth. The NPPF states that international and national bodies have set out broad principles of sustainable development including:
- Resolution 24/187 of the United Nations General Assembly, which defines sustainable development as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. (Brundtland Report)
 - The UK Sustainable Development Strategy Securing the future, which sets out five guiding principles of sustainable development.
 1. Living within the planet's environmental limits.
 2. Ensuring a strong, healthy and just society.
 3. Achieving a sustainable economy.
 4. Promoting good governance.
 5. Using sound science responsibly.

2.42 The Government believes that sustainable development can play three critical roles in England:

| | |
|---------------------------|---|
| Economic role | Contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places to support growth and innovation |
| Social role | Supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations, and by creating a high quality built development with accessible local services |
| Environmental role | Contributing to protecting and enhancing our natural, built and historic environment |

2.43 The presumption in favour of sustainable development should be seen as a golden thread running through both plan-making and decision making. The presumption is subject to two exceptions as outlined in part 3 to the policy.

2.44 The NPPF provides specific detail relating to 13 aspects of sustainable development which proposals and plan-making needs to comply with. These are:

- building a strong competitive economy
- ensuring the vitality of town centres
- supporting a prosperous rural economy
- promoting sustainable transport
- supporting high quality communications infrastructure
- delivering a wide choice of high quality homes
- requiring good design
- promoting healthy communities
- protecting Green Belt land
- meeting the challenge of climate change, flooding and coastal change
- conserving and enhancing the natural environment
- conserving and enhancing the historic environment and
- facilitating the sustainable use of minerals.

Alternative option/s 1

The are no reasonable alternatives associated with this option. The government requires this policy to be included in a Local Plan and it reflects the NPPF. To omit this policy may make the plan unsound when it is subject to an independent Examination in Public.

What does the sustainability appraisal say?

2.45 The policy option promotes sustainable development and encourages development to occur in a manner consistent with the Lewisham Local Plan and the NPPF policies and intent. This will allow for sustainable development that may have beneficial outcomes such as improved health and wellbeing and social inclusion for the local population. Sustained economic growth across a variety of sectors may also lead to the promotion of local employment opportunities and new enterprises in Lewisham to the benefit of the local population.

- 2.46** Sensible implementation of this policy option is important to ensure that the development occurs in a sustainable manner where policies are either out of date or not relevant. Without careful assessment, development may have the potential for adverse impacts on the local environment through increased waste generation locally, potential impacts on human health through air quality with increased construction and biodiversity through potential decreases in open/natural spaces.

2.4 Prevention of loss of existing housing

What is the aim of this policy option?

- 2.47** The aim of this policy option is to prevent the loss of existing housing except where a proposal meets certain criteria. A core principle of the planning system is the delivery of homes to meet housing need. The loss of housing arising from redevelopment is not consistent with the NPPF, in general conformity with the London Plan or in accordance with the Core Strategy. To ensure Lewisham's existing housing stock is maintained and adequately replaced, justification for any housing loss needs to be provided.

Council's recommended option 2

Preventing loss of existing housing

1. The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use in the following circumstances:
 - a. the proposed redevelopment would result in housing gain which regenerate and replace older housing estates in line with an agreed plan or strategy
 - b. the land or premises are allocated for another use in an adopted Local Plan
 - c. a change of use to a local community service or facility is proposed that meets an identified need
 - d. an economic viability study confirms that the dwelling/s cannot be rehabilitated to a satisfactory standard at reasonable cost
 - e. evidence shows that environmental problems are such that demolition and redevelopment is the only effective option.
2. The reconversion of a former single dwelling house with multiple dwellings to a single dwelling may be acceptable in predominantly residential areas suitable for family occupation subject to amenity considerations and DM Options 29, 30, 31 and 32.

Justification

- 2.48** Core Strategy Policy 1 (CSP1) states that 'development should result in no net loss of housing'. This reflects the London Plan where paragraph 3.13 states 'The Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners' and Policy 3.3 (Increasing housing supply) which emphasises the pressing need for more homes in London and the Lewisham's role in seeking to achieve and exceed its minimum borough annual housing target (1,105 dwellings) in order to meet local housing need.
- 2.49** The Council's recommended option is supported by the findings of the Lewisham Housing Market Assessment and the South East London Boroughs' Strategic Housing Market Assessment as well as the Lewisham Housing Strategy, which show overwhelming housing need. This is supplemented by the the London Strategic Housing Market Assessment and the Mayor's Housing Strategy (2011).
- 2.50** The Council's recommended option supports the demolition and net replacement of affordable housing provided this forms part of an identified regeneration plan for a housing estate. Replacement housing should meet the requirements of CSP1 and DM Policy Options 29, 30, 31, 32.

- 2.51** Given the overwhelming need for housing in the borough the loss of residential uses will not normally be acceptable. However, there may be circumstances where such loss is acceptable. A change of use may be permitted where a local need can be demonstrated to provide an essential local community service. The Lewisham Infrastructure Delivery Plan provides an evidence base for the provision of suitable facilities. Proposals will be considered on their merits having regard to the impact on the amenity of residents, car parking and traffic. The Council's approach to community facilities is set out in Core Strategy Policy 19 and DM Option 40.

Alternative option/s 2

The reasonable alternatives associated with this option are limited due to the evidence showing overwhelming local housing need and the importance placed on housing provision by the Government and Mayor of London. This need has been reflected in the Lewisham Core Strategy. However, alternative options could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a local policy.
2. Excluding parts 1d. and 1e. from DM Option 2.

What does the sustainability appraisal say?

- 2.52** The sustainability appraisal showed likely long term positive effects on social cohesion and public health and well-being. There are also likely to be indirect long term positive effects as the townscape and cultural heritage assets are maintained (and possibly enhanced), and features important to biodiversity (such as old buildings for bats), are safeguarded. Adverse impacts include land-use competition is likely to arise between the need for housing and requirement for other premises (such businesses and commercial enterprises). Protection of existing housing will make climate change and flood risk adaptation and mitigation more difficult, as retrofitting existing older buildings with sustainable design features may be expensive and problematic. Temporary adverse effects on air and noise quality during the construction phases were also identified.
- 2.53** Alternative 1 lacks detail for effective implementation. Alternative 2 provides similar positive and adverse effects to the recommended option, however the positive effects are likely to be reduced / negated as a larger number of derelict / unused buildings (which cannot be redeveloped due to the retention of housing policy) remain undeveloped. In the long term this may have adverse effects on the protection off the townscape and cultural/heritage assets, economic growth, crime and community safety if buildings are left unused.

2.5 Conversion of a single residential dwelling to two or more dwellings

What is the aim of this policy option?

- 2.54** The aim of this policy option is to appropriately manage the future subdivision of family dwellings and commercial space into self contained flats, in order to ensure that new dwellings provide a high standard of amenity, and to promote and retain housing choice in the borough.
- 2.55** Family housing (single dwellings with three or more bedrooms) is seen as a valuable resource which should be retained in order to meet identified housing need and provide housing choice. Smaller houses with fewer than three bedrooms should also be retained in order to provide housing choice.
- 2.56** The conversion of underused or vacant office and commercial space into flats can be a good way of providing new residential accommodation and ensuring that this space is well used. Office and storage space above shops will have permitted development rights for the change of use to up to two flats. The policy option below is intended to provide a framework for the appropriate conversion of office or commercial spaces into residential development.

Council's recommended option 3

Conversion of a single dwelling to two or more dwellings

1. The Council will not grant planning permission for the conversion of a single dwelling into flats other than in the following circumstances:
 - a. physical situation, environmental conditions or lack of external amenity space means that the dwelling is not suitable for family occupation and the dwelling has a net internal floorspace greater than 130 sq.m. And
 - b. any conversion permitted meets the general design requirements and housing standards in DM Option 24 (Landscaping and trees), DM Option 28 (Car parking), DM Option 29 (Urban design and local character), DM Option 30 (Alterations and extensions to existing buildings including residential extensions) and DM Option 31 (Housing design, layout and space standards).

Conversions of office space and other commercial properties into flats

1. The Council will support the conversion of office space and other commercial properties into self contained flats in the following circumstances:
 - a. the proposal does not conflict with other policies in relation to employment floorspace and shopping frontages (DM Options 8, 9, 10, 11, 13, 14, 15)
 - b. the proposal meets the standards set out for residential development in DM Option 31 (Housing design, layout and space standards)
 - c. the proposal achieves a good living environment with adequate access, parking and safety standards, refuse storage and collection arrangements and
 - d. the conversion of a public house for residential use will need to meet the requirements of DM Option 19 (Public Houses).

Justification

- 2.57** The conversion of single dwelling houses into flats will be permitted under the strict circumstances described in the policy option. Single dwelling houses in situations unfavourable to family occupation include properties adjacent to the Strategic Road Network, houses that lack sufficient external amenity space or other physical conditions that would be individually assessed. However, the Council is concerned that new flats in these dwellings should provide appropriate space standards for the occupiers and considers that a minimum floorspace standard should be retained to ensure that new converted flats provide a good standard of accommodation.
- 2.58** The NPPF (paragraph 50) states that 'To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes) and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand'. The above policy option is consistent with this guidance.
- 2.59** The London Plan Policy 3.8 (Housing choice) states that Londoners should have 'a genuine choice of homes that they can afford and which meet their requirements for difference sizes and types of dwellings in the highest quality environments.' This policy option is intended to provide that choice by ensuring that conversions of single dwellings into flats does not further reduce the provision of this type of housing. This is discussed further below.
- 2.60** The London Plan Housing Draft Supplementary Planning Guidance December 2011 (SPG) (paragraphs 1.2.13 - 1.2.17) states that since the early 1990s the conversion of houses to smaller flats represented nearly a third of London's Housing Capacity and was especially important in inner London. Since then conversions reduced in importance although continued to make a significant net contribution to housing output in appropriate locations. In some neighbourhoods where conversion pressures are particularly acute, proposals may lead to over development, so compromising local residential amenity.
- 2.61** The above mentioned London Plan SPG states that a balance has to be struck between realising the potential of residential conversions, especially to meet the needs of smaller households, and sustaining the residential quality of those neighbourhoods where pressure for conversion is particularly intense. Across the capital as a whole, the pan London SHMA identifies a surplus of large houses. Where this is confirmed at local level, the planning system can support their conversion into attractive smaller units, while ensuring proper safeguards for local amenity. The draft SPG considers that locally restrictive policies should not be applied along transport corridors or within reasonable walking distance of a town centre without robust justification.
- 2.62** The Lewisham Housing Conversions Study 2012 has been prepared to provide evidence for this policy option and uses data provided by the Valuation Office (VOA) to identify the potential for the conversion of single dwelling houses in the borough. The data is analysed into small areas called Lower Super Output Areas (LSOAs) which were prepared by the Office for National Statistics to be compact in shape, homogeneous both socially and in relation to the type of dwelling in each area e.g. detached or semi-detached and nature of tenure e.g. owner occupied, privately rented etc. The VOA provided data on the number and type of dwellings in each LSOA and also the number of properties at various floorspace sizes. This was used to assess the potential each LSOA had for the conversion of dwellings into flats at various floorspace thresholds.

- 2.63** The data showed a very wide variation in conversion potential across the borough. Wards such as Bellingham and Downham dominated by former London County Council Estates had very little potential for conversion in any of their LSOAs as the vast majority of dwellings fall below the saved UDP floorspace threshold of 130 sq.m. net floorspace (UDP Policy HSG 9 Conversion of residential property). Any conversion policy option chosen would have no significant impact in this ward. Telegraph Hill Ward showed one LSOA that had the potential for the conversion of 100% the remaining stock of unconverted houses into flats in an area where converted flats already predominate. Evelyn Ward which is predominantly flatted development has the potential to lose 20% (10 dwellings) of the remaining unconverted housing stock which would reduce housing choice in the area. Most wards present a more mixed picture but several have the potential for the conversion of large numbers of family sized dwellings which would reduce housing choice in the borough.
- 2.64** The Housing Conversions Study shows that the one bedroom flats represented 50% of conversion completions in 2010/11 and 52% of conversion completions in 2009/10. Of the total converted flats provided over the period 16% were three+ bed dwellings usually categorised as family dwellings. With the adoption of dwellings floorspace standards from the London Plan which provide more generous room sizes especially with respect to bedrooms, the provision of larger sized flats might not be possible in the future if the retained UDP policy threshold was to be carried forward to the DMLP. The Housing Conversions Study (paragraph. 6.160) also shows that over the past four year family sized dwellings have represented the minority of new dwellings coming forward with three to six bed dwellings representing an average of approximately 11% of new supply between 2008-2011. The study also shows that recent housing completions between 2008 and 2011, one and two bed dwellings predominate at on average 89% of all completions. The recent history of completions provides a further justification for the retention of family sized dwellings by this policy option.
- 2.65** The evidence in the Lewisham SHMA shows that the main need for housing in Lewisham is for family housing which is defined in the London Plan as houses having three or more bedrooms, and that the further conversion of houses into flats should be limited. The Council has ensured through the Strategic Site Allocations in the Core Strategy and the smaller other allocations in the Site Allocations Local Plan and Lewisham Town Centre Local Plan that the projected housing growth for Lewisham can be accommodated without the need for the further conversion of dwelling houses into flats and the consequent loss of high quality family accommodation.
- 2.66** This policy option will also meet the aims of Core Strategy Spatial Policy 5 (Areas of stability and managed change) which seeks to achieve mixed and balanced communities and preserve a choice of accommodation sizes in line with policies in the London Plan. The Lewisham Conversion Study estimates that the policy option would ensure the retention of up to 7,300 unconverted family dwellings (as compared to what could potentially be granted planning permission by retained UDP Policy HSG 9) in line with the need for this type of accommodation identified in the Lewisham SHMA. The VOA data shows that 54% of the entire housing stock is already in the form of flats and 18% of the total is in the form of conversions.
- 2.67** The recommended policy option allows for the conversion of houses not considered suitable for family occupation. The Council considers that the recommended policy option is appropriate and is the most consistent and effective way to prevent the conversion of dwellings suitable for family accommodation that will meet identified housing need.

- 2.68** The conversion of shops and offices and other commercial buildings into flats will be supported in appropriate circumstances as a valuable means of retaining the vitality of shopping centres by ensuring that vacant or underused space is brought back into use. Residential development is a valuable use for commercial properties that have become vacant and/or are no longer capable of offering suitable accommodation for retail or commercial uses.

Alternative option/s 3

The reasonable alternatives associated with this option are:

1. The conversion of houses into flats will not be permitted where the net floorspace of a dwelling falls below 200/175/150 sq. m. as originally constructed.⁽¹⁰⁾
2. Retain the UDP threshold (see saved UDP Policy HSG9 (Conversion of residential property) for allowing conversions at a net floorspace of 130 sq.m as originally constructed.
3. The conversion of houses in areas of the borough where there are a large number of family houses potentially available and/or where conversion of these would result in the number of flats in the area predominating over single family dwellings or an increase in the concentration of flats will not be permitted (known as Areas of Restraint).

Option 1 would have the benefit of increasing the stock of unconverted housing protected from conversion but would not take account or protect areas of larger housing from conversion and the cumulative impacts of this on small areas. The impact on these areas could be moderated by requiring the provision of flats suitable for larger families providing three or more bedrooms.

Option 2 would not reduce the loss of larger family sized units and would reduce housing choice across significant areas of the Borough. At this floorspace threshold it is usually possible to create two x two bed flats which are not considered to provide adequate family accommodation.

Option 3 could be implemented in various ways - some areas might be identified that do not have an acceptable level of public transport provision or where the cumulative impact of past conversions means that there is no capacity for further conversions to be accommodated without reducing the capacity of an area to sustain a mixed and balanced community or a range of housing choices.

What does the sustainability appraisal say?

- 2.69** The sustainability appraisal showed beneficial impacts on population, human health and material assets. The policy option will have positive effects on the population and human health through the promotion of sufficient housing with appropriate mix, promotion of social inclusion and addressing inequalities through the opportunity to live in a decent home. Adverse impacts were identified in respect of extra pressure being placed on retail space by allowing conversion to residential.

¹⁰ For further information on the method of floorspace calculation refer to the Appendix 2, Glossary

2.6 Sheltered housing and care homes

What is the aim of this policy option?

- 2.70** The aim of this policy option is to ensure sheltered housing and care homes are provided in appropriate locations. This form of housing provides a specific housing need and as the proportion of the population that is aged increases the Council needs to ensure it can meet demand for this type of housing.

Council's recommended option 4

Sheltered housing and care homes

1. The Council will support proposals for sheltered housing and care homes provided that the development:
 - a. will be suitable for the intended occupiers in terms of the standard of facilities, the level of independence, and the provision of support and or care
 - b. will be easily accessible to public transport, shops, services, community facilities and social networks appropriate to the needs of the intended occupiers as well as immediate proximity to local services.
2. In the case of market-led development of self-contained sheltered housing in Use Class C3, the Council will expect the development to make a contribution to the supply of affordable housing in accordance with Core Strategy Policy 1. In the case of care homes, particularly for older people, the Council will encourage a mix of tenures.
3. The Council will support development of care homes that combine independent living with the availability of support and nursing care.
4. The Council will resist development that involves the net loss of floorspace in sheltered housing and care homes unless:
 - a. adequate replacement accommodation will be provided that satisfies criteria 1. a and 1.b above or
 - b. it can be demonstrated that there is a surplus of care homes in the area and
 - c. it can be demonstrated that the existing care homes are incapable of meeting relevant industry standards for suitable accommodation.
5. Where the Council is satisfied that a development involving the loss of sheltered housing or care homes, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

Justification

- 2.71** Option 4 sets out criteria for assessing housing proposals for sheltered housing and care homes, including its appropriate location. The option supports the NPPF (paragraph 50) and the London Plan Policy 3.5 (Quality and design of housing developments) and Policy 3.8 (Housing choice).

- 2.72** A key criterion is the fit between the facilities and the needs of residents. However, the relationship between a development and its surroundings is also important. In promoting independence, the council will seek to ensure that residents have access to the services they need, and have the opportunity to play an active role in the community. Locations with access to existing social networks and facilities is one way of facilitating interaction and can help to prevent isolation. The Council defines accessible locations as those generally located at a distance of not more than 400 metres from the proposed development site and for this distance to be accessible by means of a suitable access pathway and gradient.
- 2.73** There is a market for the letting and sale of care homes particularly housing designated for older people, although the supply in Lewisham is limited at present. The Lewisham SHMA indicated that 17.9% of households in Lewisham were all older and another 5.5% contained at least one older member of the household alongside younger members.⁽¹¹⁾ The proportion of older households that live in the social rented sector accounts for 44% of all older person households in the borough.⁽¹²⁾ Around 20% were of older person households likely to consider sheltered housing or a flat in a block specifically built for older people.⁽¹³⁾
- 2.74** The ability of older people to access such accommodation varies considerably depending on whether they own their existing housing, have other assets and investments, and whether they have a pension. Therefore, new housing for older people, including care homes will need to be available at a range of costs and tenures.
- 2.75** Where self-contained housing is specifically proposed for older people to buy or lease, the council will seek affordable housing in accordance with Core Strategy Policy 1. Affordability and the financial support available to older people will also be considerations where care homes are proposed. The Council acknowledges that arrangements for assessing affordability to people of pensionable age will be different from assessing affordability to people of working age, especially when housing costs include an element of care. However, the council will encourage the providers of care homes to include a variety of tenures to suit older people from different backgrounds.
- 2.76** Where the Council accepts that an existing site or property is no longer appropriate for care homes, development for self-contained standard housing will be the preferred option, including the provision of an appropriate proportion of affordable housing. When considering redevelopment for self-contained standard housing, the Council will have regard to the criteria set out in Core Strategy Policy 1, and any need to generate funding for replacement housing for a care home elsewhere. If replacement housing is provided elsewhere, the council will consider the proportion of affordable housing provided across both sites. The council will resist proposals for non-residential development in accordance with Development Management Policy 1, and will seek to retain existing affordable housing in accordance with Core Strategy Policy 1.

11 Paragraph 7.28, Lewisham SHMA

12 Paragraph 7.30, Lewisham SHMA

13 Paragraph 7.39, Lewisham SHMA

Alternative option/s 4

The alternatives associated with this option could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a local policy.
2. Allowing this form of housing anywhere in the borough rather than seeking to locate close to public transport and other appropriate services and facilities.
3. Excluding part 2 from Option 3.

What does the sustainability appraisal say?

2.77 The sustainability appraisal showed the Council's recommended option promotes good quality, affordable, accessible housing for the elderly. This will have positive effects, allowing for increased health and well-being, social inclusion and better health equality. Implementation is key to ensure sustainable design principles are incorporated into new new designs and the impact on the townscape and cultural/heritage assets are positive. Alternative 1 recorded positive sustainability impacts but lacks detail for effective implementation. Alternative 2 has similar positive impacts but access to community facilities would be reduced affecting accessibility, social cohesion and potentially health equality. Alternative 3 would impact negatively on access to housing with potential impacts for health and well-being, social inclusion and better health equality.

2.7 Houses in multiple occupation

What is the aim of this policy option?

2.78 The aim of this policy option is to provide controls for Houses in Multiple Occupation (HMO). A HMO is classified as Use Class C4. HMOs are shared dwelling houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom. Without careful consideration a HMO can lead to the loss of family dwellings and impact the amenity of surrounding residential dwellings and the wider neighbourhood.

Council's recommended option 5

Houses in multiple occupation (HMO)

1. The Council will consider the provision of new Houses in Multiple Occupation where they:
 - a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher
 - b. do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood
 - c. do not result in the loss of existing larger housing suitable for family occupation
 - d. satisfy the housing space standards outlined in DM Option 31 and
 - e. satisfy the appropriate Environmental Health standards.
2. The Council will resist the loss of good quality Houses in Multiple Occupation.
3. The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.
4. All new HMOs are required to provide 10% wheelchair accessible rooms and must be fully fitted from occupation.

Justification

2.79 Houses in Multiple Occupation (HMO) refers to residential property that takes the form of shared houses, flats and non-self contained dwellings let to three or more unrelated tenants who form two or more households and share a kitchen, bathroom or toilet. Households are families, including single persons and co-habiting couples (whether or not of opposite sex).

2.80 A HMO is classified as Use Class C4 in planning law. The C4 Use Class applies to small scale HMOs shared by three to six people. However, permitted development rights allow changes of use between regular self contained housing in Use Class C3 and HMOs in Use Class C4 without the need for planning permission, unless a local authority has specifically identified an area in which planning applications will be required. This policy option will not apply to changes of use between Use Classes C4 and C3 unless Lewisham removes permitted development rights at a future date. HMOs within the C4 use class will be assessed as a C3 Use Class.

2.81 HMOs with more than six occupiers are not specifically defined within a separate use class and are classified as Sui Generis. This means that planning permission is required for a material change of use to or from a multi occupied property in this category. HMOs considered to be Sui Generis are covered by DM Option 5.

- 2.82** DM Option 5 supports Core Strategy Strategic Objective 3 and Core Strategy Policy 1.
- 2.83** HMOs that are of a good standard provide an important part of the provision of affordable housing in Lewisham, particularly for young people and those with low incomes. For some, the availability of bedsits or lodgings may be the only alternative to homelessness and for this reason the loss of existing good quality HMOs will be resisted.
- 2.84** It is important that the standard of HMO accommodation is of a good quality. This will mean sufficient internal space in accordance with the standards outlined in DM Option 31 (Housing design, layout and space standards), provision of amenity space for the occupants, and no significant adverse amenity impacts to the adjacent and/or surrounding residential neighbourhood.
- 2.85** The location of a HMO is generally not suitable for the Areas of Stability and Managed Change as shown in the Lewisham Core Strategy (Spatial Policy 5) due to the impact on social and physical infrastructure. These areas are largely residential or suburban in character and public transport accessibility is lower than other areas of the borough.
- 2.86** The 10% wheelchair accessible rooms should be fully fitted from the outset because leases are often short and turnover relatively high within this type of accommodation.

Alternative option/s 5

An alternative associated with this option could include:

1. Relying on the policies in the London Plan rather than a local policy.
2. Restricting HMOs to certain locations such as town centres or those with a high PTAL.

What does the sustainability appraisal say?

- 2.87** The sustainability appraisal showed the Council's recommended option promotes affordable, good quality housing for young people and those on low incomes. This will have positive effects on equality and health and well-being. There may also be positive effects for social enterprise and employment as a solid base (a good home) for young and on lower incomes may facilitate greater employment and stability for new enterprise. Sensible implementation is important to ensure that HMOs do not adversely impact the surrounding amenity of a neighbourhood and are placed in areas with access to public transport and community facilities. Alternative 1 recorded positive sustainability impacts but lacks detail for effective implementation. Alternative 2 has similar positive and adverse effects to Council's recommended option although access to services and community services is likely to be improved. Concentrating HMOs within certain areas may however intensify adverse effects relating to social cohesion and community health and well-being.

2.8 Affordable rent

What is the aim of this policy option?

2.88 The aim of this policy option is to provide policy requirements relating to the 'affordable rented housing' tenure. Affordable rented housing is a form of affordable housing introduced by the government and included within the NPPF. The government defines affordable rented housing as a form of social housing. To ensure the housing needs of existing and future residents can be met, the Council feels it is appropriate to specify when affordable rented housing will be considered.

Council's recommended option 6

Affordable rented housing

1. The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.
2. If providing affordable rented housing:
 - a. the percentage of dwellings designated for this tenure shall be negotiated with the Council to ensure homes are genuinely affordable for households on low incomes
 - b. rents should not exceed 'target rents' for dwellings of 3 bedrooms or more and
 - c. such dwellings are to remain at 'target rent' levels in perpetuity.

Justification

2.89 Core Strategy Policy 1 (CSP1) sets out a clear policy on affordable housing for the borough over the plan period. CSP1 requires housing development on qualifying sites (10 or more dwellings) to provide as much affordable housing as is financially viable. The starting point for negotiations is a contribution of 50%. The Core Strategy defines two types of affordable housing: social rented and intermediate housing. The required tenure mix is 70% social rented and 30% intermediate housing.

2.90 The Council carried out a number of studies to support its approach and the Core Strategy requirements are based on a balance between meeting the need for more affordable housing in and ensuring schemes are viable and can be delivered. Evidence underpinning the Core Strategy looked at housing need and viability, specifically the Lewisham Housing Market Assessment and the Affordable Housing Viability Study. The studies highlight the need for more affordable housing in Lewisham, particularly more social rented housing and also highlight the low average incomes of those in housing need.

2.91 Where the policy minimum requirement cannot be met, applicants are required to submit a financial appraisal to demonstrate why provision cannot be delivered. The council assesses the financial appraisal and the proposed scheme on a case by case bases.

2.92 Since the Core Strategy was adopted in June 2011 the government has made changes to the definition and delivery of affordable housing. This has now been reflected through the NPPF and these changes have also been included in recent amendments to the London Plan.

- 2.93** A category tenure called 'affordable rented housing' is now included within the NPPF definition of affordable housing. This new tenure is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent.⁽¹⁴⁾ Tenancy can range from two years to a lifetime and will be offered by registered providers of social housing through the usual letting and nomination process to new tenants. The introduction of this new tenure was driven by reductions in the availability of capital grant funding and not by the ability of local households to afford the new rent levels.

Alternative option/s 6

The reasonable alternative associated with this option could include:

1. The Council does not prescribe target rent levels for any type of affordable rented housing and leaves this for the housing provider to determine.

What does the sustainability appraisal say?

- 2.94** The sustainability appraisal showed the Council's recommended option promotes affordable homes for those on low incomes and is likely to have positive effects for health equality and community well-being. It is also likely to be positive for social enterprise and employment as a solid base (a good home) for the young and those on lower incomes may facilitate greater employment and stability for new enterprise. Implementation is important to ensure proposals do not adversely impact the surrounding amenity of a neighbourhood and are placed in areas with access to public transport and community facilities. Alternative 1 has similar positive and adverse effects to the recommended option although removal of either part 1a or 1b is likely to reduce the affordability of the housing with possible adverse effects on the population and human health. Access to affordable housing for low-income and vulnerable sections of the community will be made more difficult, this policy may also result in local workforce moving to other areas with more affordable housing.

2.9 Student housing

What is the aim of this policy option?

2.95 This policy aims to ensure student housing is provided in the the most appropriate and accessible locations and has due consideration to surrounding land uses. The need for student housing is associated with the provision of higher and further education institutions both within and adjoining the borough. Lewisham is the location of Goldsmiths College (University of London) at New Cross, Trinity Laban Conservatoire of Music and Dance at Deptford and Lewisham College with campuses at Deptford Bridge and Lewisham Way. There are also several campuses of Greenwich University in the Royal Borough of Greenwich and Lewisham is within easy reach of central London universities and colleges.

Council's recommended option 7

Student housing

1. The Council will support proposals for student housing provided that the development:
 - a. will not involve the loss of permanent self-contained homes
 - b. will not involve the loss of designated employment land
 - c. will not involve the loss of leisure or community space
 - d. will not prejudice the Council's ability to meet its annual London Plan housing target for additional self-contained homes
 - e. has an identified end user affiliated with an educational institution or student housing management company
 - f. is well served by public transport and is accessible to a range of town centre, leisure and community services
 - g. provides a high quality living environment and includes a range of unit sizes and layouts, with and without shared facilities, to meet the requirements of the educational institutions it will serve
 - h. complies with all relevant national and local standards and codes including ANUK and any relevant standards for houses in multiple occupation (HMOs)
 - i. demonstrates that it is suitable for year round occupation and that it has long term adaptability and sustainability, including adequate and suitable cycle parking
 - j. contributes to creating a mixed and inclusive community and
 - k. does not cause unreasonable harm to residential amenity or the surrounding area.
2. The Council will resist development that involves the net loss of student housing unless:
 - a. adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or
 - b. the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Lewisham or adjoining boroughs.
3. Where the Council is satisfied that a development involving the loss of student housing is justified, the replacement development is to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

Justification

- 2.96** The council considers student accommodation (purpose built or conversion of existing buildings that are not family housing) a suitable use provided that proposals can meet the criteria outlined above in DM Option 7.
- 2.97** The council will ensure that any student accommodation has a positive effect on the surrounding environment and image of the borough. It is important that proposals are of the highest design quality. The council will protect the borough against the construction of buildings that do not serve their intended purpose and run the risk of dereliction. To prevent such circumstances from occurring, speculative development will not be acceptable and the council will require applicants to secure a commitment of use by an educational institution or a recognised student housing management company prior to commencing development. The location of the occupying universities will also greatly affect the transport assessment required.
- 2.98** Site management and maintenance is considered key to successful student accommodation and will be secured by way of a Section 106 agreement, which may cover such matters as provision of on-site wardens, use of communal facilities, elimination of potential noise nuisance and security and safety for occupants.
- 2.99** The conversion of existing buildings to student accommodation is particularly sensitive given the requirements to provide a high quality living environment which is not always possible with the conversion of existing buildings not originally designed for that use. In particular, the council will not approve applications that cause a loss of residential, employment, retail, leisure or community space and would not accept student accommodation which would be unduly compromised by the layout or position of an existing building.
- 2.100** The council's housing trajectory will be used to monitor the amount of student housing and ensure that levels do not affect the borough's ability to meet its London Plan housing targets.
- 2.101** Applicants will be required to submit management plans for the student accommodation planned as part of the planning application process.

Alternative option/s 7

An alternative associated with this option could include:

1. Relying on the policies in the London Plan rather than a local policy.
2. Restricting student housing to certain locations such as town centres or those that are nearby or adjoin an education institution.

The option of allowing student accommodation anywhere in the borough is rejected as this is not considered sustainable due to amenity, traffic and sustainable development impacts.

What does the sustainability appraisal say?

- 2.102** The sustainability appraisal showed the Council's recommended option promotes environmentally sustainable and affordable student housing, the provision of which is likely to have long term positive effects for students and encourage education and skills development. The policy considers access to education facilities which is essential to minimises long term congestion and air quality impacts. Land-use competition is likely to

arise between the need for student housing and requirement for commercial premises. The provision of new student housing may therefore adversely impact townscape and cultural heritage assets. There is an element of nuisance / social disturbance associated with students and the night time economy - sensible implementation will be needed to avoid adverse effects on neighbours and the well-being of the community.

- 2.103** Alternative 1 recorded positive sustainability impacts but lacks detail for effective implementation. Alternative 2 may result in increasing environmental pressure on areas already under stress. Students will also be concentrated within certain areas which may lead to an intensification of adverse social issues. This may lead to greater social exclusion and an adverse effect on community safety and well-being.

2.10 Mixed use employment locations

What is the aim of this policy option?

2.104 The aim of this policy option is to set out how the mix and proportion of B Use Classes will be maintained in Mixed Use Employment Locations (MELs). MELs are sites within the borough which had or still have industrial uses which were assessed by the Lewisham Employment Land Study (ELS) to represent areas of older and poorer quality industrial uses at low densities, often incompatible with adjoining residential areas. The Core Strategy requires new developments on these sites to deliver a radical improvement in the physical quality of the urban environment and to attract further investment where the environment is poor and unemployment and levels of deprivation are high and to provide a proportion of floorspace within the B Use Class (office, workshops, industry and warehouses and storage). The policy option deals with how a development may change over time with applications for changes of use considered in the context of the Core Strategy aims for these areas.

Council's recommended option 8

Mixed use employment locations

1. The Council will require applications for changes of use of B Use Class floorspace to ensure that these sites continue to meet the Core Strategy aims for high density mixed use development that contributes to the local economy and provides a range of local employment opportunities. Core Strategy Policy 4 requires 20% of the built floorspace of mixed use developments on these sites to be in the B Use Class. Future changes of use should ensure that the proportion of B uses within the development does not fall below that which was originally granted permission in line with the aims of the Core Strategy.
2. New development or proposals for a change of use, should ensure that a variety of uses continues to be provided that take advantage of the location which is close to central London, to supply spaces in flexibly specified buildings that allow for the continued employment functioning of an area in line with Core Strategy Policy 4, for businesses in identified growth sectors such as business services, food and the creative industries.
3. New proposals will need to be provided with an internal fit out to an appropriate level to ensure the deliverability and long term sustainability of the employment uses on the site and be designed to ensure future flexibility of use by a range of businesses in the B Use Classes in line with Core Strategy Strategic Site Allocations 2, 3, 4, 5.
4. Proposals for changes of use of non residential floorspace to residential use will not be considered appropriate on MELs due to the need to ensure that the balance of uses on the site is retained.

Justification

2.105 MELs promote high density mixed use residential/commercial developments. They are central to implementing the Core Strategy aims for the regeneration of the Deptford/New Cross area through improving the quality of the local environment, providing new housing and facilities in a deprived area of the borough. The MELs are also central to the economic strategy for the borough by providing new buildings capable of attracting and accommodating a wide variety of new and established businesses on sites in industrial use which no longer provided a good quality environment for businesses to prosper, poor quality buildings and a low job density. The Council will expect to see a high proportion of smaller business units provided on these sites for growth sectors identified in the ELS such as creative industries, and business support services and food manufacturing in line with the aims in the Core Strategy.

- 2.106** Flexibly specified buildings are considered essential to ensure the long term sustainability of employment uses on these sites. Flexible buildings will allow the reconfiguration of internal space to suit new occupiers with different space requirements and also allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to the requirements of new users. An internal fit out to an appropriate level rather than provision of a 'core' and 'shell' will also be considered necessary to ensure the deliverability and long term sustainability of employment uses in these locations by ensuring that these buildings are attractive to new occupiers. The NPPF has a central principle that all development must be sustainable this policy is designed to ensure the future sustainability and deliverability of units in the B Use Class on these locations. The Council will seek to secure the delivery of the non-residential uses on sites and early thought should be given to potential end uses and users.
- 2.107** The ELS has identified clusters of industries that represent growth sectors in the local economy. The sites that have received proposals for development to date have not necessarily reached the 20% requirement of built floorspace to be within the B Use Class, but have proposed alternative forms of employment generating use in order to achieve a vibrant and sustainable development that meets the overall aims of the Core Strategy. The ELS provided a strong case for the viability of a requirement for 20% of the floorspace to be within the B Use Class which would support growth sectors in the local economy and would not wish to see the B Use Class elements on these sites diluted further.

Alternative option/s 8

There are no alternative options proposed as it is considered that the recommended policy option is in line with the adopted Core Strategy.

What does the sustainability appraisal say?

- 2.108** The sustainability appraisal identified beneficial impacts on population, human health, material assets. This policy option seeks to protect employment land and promote mixed-use and local business development within Lewisham and aims to encourage new buildings capable of attracting and accommodating a wide variety of new and established businesses on sites in industrial use. Through the improvements, there are positive effects on the population through encouraging sustained economic growth and promoting employment and enterprise in Lewisham. This may have indirect positive impacts through making the borough a nice place to live and work through improving the amenity and enhancing opportunities for residents. The SA identifies adverse impacts through restrictions on developers that may have an indirect (and temporary) negative effect on economic growth in the borough. However, this will be off-set by the potential beneficial impacts through ensuring mixed use development in Lewisham is managed.
- 2.109** The recommended option is in accordance with the Lewisham Core Strategy, and therefore this alternative would have similar impacts as those listed above. However, the policy option is a lower tier policy with more detail and therefore may allow for greater clarity at implementation.

2.11 Local employment locations

What is the aim of this policy option?

2.110 The aim of this policy option is to ensure the continued functioning of Local Employment Locations (LELs) as a valuable element of the local economy by protecting B Use Classes (office, workshops, industry and storage/warehousing). The LELs are small, well defined clusters of good quality buildings in office, industrial and warehouse uses, often within walking distance of town centres. They form an important element in the local economy by providing a flexible range of modern premises with appropriate servicing facilities that can host a wide variety of local suppliers of goods and services that are less suitably located in town centres. These locations are therefore very valuable in maintaining the local economy.

Council's recommended option 9

Local Employment Locations (LEL)

1. The Council will consider uses within the B Use Class, within a Local Employment Location, subject to:
 - a. the use being appropriate in the location in relation to the surrounding built context,
 - b. the intensity of the use, and
 - c. the new use meeting the aims in the Core Strategy Policy 3.
2. Permission for self-storage facilities, and larger scale storage facilities and warehouses (Use Class B8) will not be granted unless part of the development re-provides the floorspace for Small and Medium Enterprises in line with Core Strategy Policy 3 which protects Local Employment Locations for a range of business uses.
3. New build premises in these locations will be required to be flexibly specified and provided with an internal fit out to an appropriate level to ensure the deliverability of the units and the long term sustainability of the employment uses.
4. Planning permission for the change of use of a building from business use to residential use, or other uses such as day nurseries, churches and other community facilities will not be granted due to the effect the proposal would have on the continued commercial functioning of the area as a whole and their incompatibility with the uses on the LEL.

Justification

- 2.111** The Lewisham Employment Land Study (ELS) supports the provision of the types of buildings offered by LELs which provide business units capable of being used by a wide variety of firms in growth sectors of the economy including small and medium enterprises (SMEs). These can typically range between 100 and 250 square metres in size.
- 2.112** The ELS also considers that business units should be flexibly specified to be able to meet the needs of a wide range of businesses. The built format of larger scale warehousing units or self storage facilities often do not provide flexible reuse and provide limited employment opportunities, although it is acknowledged that self storage facilities may provide valuable storage space for smaller mail order businesses and town centre businesses. However, the Council does not wish these larger scale storage uses to predominate on what is, in Lewisham, a very limited supply of business land supporting a small local economy with few locally provided jobs. LELs typically supply relatively good quality premises for small businesses which are in demand in Lewisham and which should be re-supplied in any new development. The LELs should therefore be managed to support a variety of business uses

that can respond to and take advantage of Lewisham's location close to wider London markets. The Council may apply conditions on planning permissions to ensure the maintenance of employment space.

- 2.113** Changes of uses outside the B Use class will not be considered on LELs. As noted above most of the LELs are within walking distance of local shopping centres and transport public transport facilities. It should not be necessary to provide facilities such as day care nurseries or cafés on these sites to support their functioning. Churches and community facilities are considered incompatible with business and commercial functioning on these sites which are largely in workshop and storage uses with large numbers of vehicle movements in open servicing areas.
- 2.114** Flexibly specified buildings are considered essential to ensure the long term sustainability of employment uses on these sites. Flexible buildings will allow the reconfiguration of internal space to suit new occupiers with different space requirements and also allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to meet the requirements of new users.
- 2.115** The NPPF (paragraph 17) has a central principle that all development must be sustainable. Councils should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.' A full internal fit out for particular schemes could include the installation of sanitary and kitchen facilities, power points and IT connections (broadband), wall and ceiling finishes and plumbing/heating and related works. A finished unit comprising of a 'shell' and 'core' only will not be acceptable as it will not be considered deliverable or sustainable in the long term by being unattractive to potential occupiers.
- 2.116** The NPPF (paragraph 22) states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The London Plan Policy 4.4 (Managing Industrial Land and Premises) sets out criteria whereby the boroughs stock of industrial land should be managed including 'the need to identify and protect locally significant industrial sites where justified by evidence of demand.' The council considers that the LELs represent good quality industrial land in short supply in Lewisham currently in active use.

Alternative option/s 9

An alternative associated with this option could include:

1. Allowing free changes of use within the B Use Class within appropriate environmental parameters. This may have the disadvantage of allowing certain uses such as warehouses to predominate which might militate against the flexibility of use that smaller premises would allow for and reduce the number of jobs created in these areas.

What does the sustainability appraisal say?

- 2.117** The sustainability appraisal identifies beneficial impacts on population, human health, and air. The policy option seeks to protect employment land and promotes the considered and balanced development of local employment locations which will encourage sustained economic growth across a variety of sectors in Lewisham. This may have benefits to the social inclusion and ensure equitable outcomes for the community. Considerations of intensity and flexibly specified spaces promote the minimisation of material use and encourage longevity of the development. This may also result in decreased pollution from reduced lifetime construction requirements. Adverse Impacts were noted in respect of population and climate change. Land use competition may arise between the need for employment land and residential or other community developments. Protection of existing employment developments will make climate change and flood risk adaptation/mitigation more difficult as retrofitting existing older buildings may be expensive and problematic.
- 2.118** The alternative to allow free changes of uses within the B Use Class will likely have similar impacts as the recommended option, however, this may have the additional adverse impact of allowing certain classes of use to predominate in local employment locations. This has the potential to limit the strategic mix of commercial uses which reduces the flexibility of use that smaller premises allow for.
- 2.119** Reliance on the London Plan and Core Strategy rather than a separate DM policy would not provide the same level of detail at the implementation stage and could reduce certainty for development.

2.12 Other employment locations

What is the aim of this policy option?

- 2.120** This aim of this policy option is to retain employment uses where possible on the many smaller sites in office, industrial and warehouse/storage use and builders and scaffolding yards in and around town centres, district and local hubs and also embedded in residential areas on backland sites and sometimes on otherwise residential streets. These sites lie outside the formally designated employment sites. Core Strategy Policy 5 provides a framework in which applications for the change of use or redevelopment of these sites will be considered.

Council's recommended option 10

Other employment locations

Sites in Town Centres, District and Local Hubs and other clusters of commercial and/or retail uses

1. The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, District and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses and where the use is compatible with the surrounding built context by reason that they:
 - a. are well located in relation to the highway network
 - b. are well located in relation to town centres and public transport
 - c. offer the potential for the expansion of existing in-situ businesses
 - d. offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area and
 - e. provide lower cost industrial accommodation suitable for small, start-up businesses.
2. Redevelopment of a site on a commercial street frontage will be supported when the site or building is redeveloped to a high standard of environmental and design quality in line with the other policies in this plan, and a business use is retained on the ground floor and a business and/or residential development on upper floors where an appropriate standard of amenity can be achieved. Uses not within the B Use class, such as retail or other uses appropriate to a town centre or district/local hub will be considered as part of a mix of uses where the number of jobs created by the proposal outweighs the loss of an employment site.
3. Where uses are proposed for a site or building in employment or retail use that propose that do not involve any job creation or retention, the Council will require evidence that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.
4. The change of use of the ground floor of a building in retail use to residential will be supported when the criteria in the retail policies in the plan are met.

Council's recommended option 10

Cont...

Sites in residential areas

5. Applications for redevelopment for change to other business uses suitable for a residential area will be approved where:
 - a. the site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing or an alternative business use by reason of access difficulties or environmental incompatibility, and
 - b. that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.

6. A mix of uses in a new scheme will be considered positively subject to the context of the site and meeting the requirements of other policies in this plan, including, in the case of any residential development proposed as part of a scheme an appropriate level of amenity and the suitability of the site for this use.

All sites

7. The Council will seek contributions to training and/or local employment schemes where there is loss of local employment as a result of redevelopment or change of use.

8. New build business and retail premises should be provided with an internal fit out to an appropriate standard to attract new occupiers and ensure long term sustainable development.

Justification

- 2.121** Many of these smaller sites provide a valuable resource supporting local services and the vitality and viability of the local economy. Town Centres and other commercial and retail areas provide a variety of local services that are complementary to and support retail uses. A sustainable future for the borough will require the retention of these businesses and local services to reduce the need for local residents to travel and to supply local job opportunities. The Council will also support the provision of new business premises. These sites support the Core Strategy Spatial Policies 2, 3 and 4.
- 2.122** Extensive marketing evidence that a business use is no longer viable on a site or building that meets the criteria in clause 1 of the policy option will be required. The London Plan SPG 'Land for Industry and Transport' (September 2012) considers that the time period for this should normally be for at least two years and up to five years in areas of strong demand for particular types of premises. The Council supports this approach. The ELS identified a demand within Lewisham for good quality premises suitable for a variety of SMEs. The Council is also concerned that in areas of high demand for residential development, this will be in competition with B Uses vital to sustaining the local economy.

- 2.123** The Council will assess whether the marketing required by the policy option has been appropriate and will require documentary evidence that the terms on which the premises were offered were in line with prevailing market conditions for new occupiers in the B Use Class. The Council will assess whether a building or site has been maintained to an appropriate standard to attract new occupiers and will not consider marketing evidence to be valid in the absence of an appropriate level of maintenance where this would be reasonably provided. The Council will meet and exceed housing targets through sites identified in the Core Strategy, and does not require the release of good quality industrial land and buildings to assist in this.
- 2.124** Core Strategy Spatial Policy 5 covers the residential areas of the borough and envisages that these areas will be supported by a network of local services and facilities. These are identified in the policy. Other business sites not identified in the policy may have site specific environmental problems, particularly backland sites embedded in residential areas and in line with the Core Strategy Spatial Policy which supports the provision of quality living environments, residential uses would be supported. Other sites might still have the capacity to contribute to the network of services and facilities as well as recreating or repairing a street scene. Mixed use development will be sought in these circumstances. In the case of complete loss of employment sites of whatever type S106 contributions to local employment or training initiatives will be sought.
- 2.125** The policy seeks to achieve a balance by retaining the best of these buildings in appropriate locations or seeking their replacement by mixed use development which will both contribute to the local economy and contribute to housing provision thereby achieving sustainable development. In particular the Lewisham Employment Land Study 2008 (ELS) identified clusters of creative industries, and growth sectors in food and business services which may be able to use these buildings.
- 2.126** The NPPF supports flexible working practices such as the integration of residential and commercial uses within the same unit, and planning for the location, promotion and expansion of clusters or networks of creative industries.
- 2.127** The London Plan Supplementary Guidance Document Land for Industry and Transport (September 2012) paragraph 4.9 states that 'other industrial' sites combined with Locally Significant Industrial Sites (in the Lewisham Core Strategy these are called Defined Employment Locations) provided 50% of industrial land in 2010 and cumulatively are of strategic importance in meeting London's industrial requirements and, if surplus to demand, in meeting other land use needs. The draft SPG provides criteria that may be adopted in Local Pan policies to manage these smaller sites. These are based on general economic and land-use factors and indicators of industrial demand.
- 2.128** The ELS identifies a mis-match between the types of premises in the borough and the demand for new modern quality premises for SMEs.
- 2.129** An internal fit out for particular schemes could include the installation of sanitary and kitchen facilities, power points and IT connections (broadband), wall and ceiling finishes and plumbing/heating and related works. Provision of 'core' and 'shell' only for new buildings will not be considered to support or attract occupation by businesses and will not be considered to provide a sustainable contribution to economy of Lewisham. This requirement is to ensure the attractiveness, deliverability and marketability of the units and to ensure the future sustainability of new developments. The Council will seek to secure the delivery of the non-residential uses on sites and early thought should be given to potential end uses and users.

- 2.130** Live work units are self contained units small business units designed so that a proportion of the accommodation is capable of being used for residential purposes on a permanent or semi-permanent basis. These uses have been successful in ensuring continued use of some older warehouse/workshop buildings for example in Havelock Walk in Forest Hill. In many cases particularly in new build developments they have been less successful in generating employment uses. Where these uses are proposed evidence will be required as to the sustainability of employment uses that could be generated by the development.

Alternative option/s 10

The reasonable alternative associated with this policy option could include:

1. Grant planning permission for residential use on business sites and buildings in residential areas. This may result in a depletion of services in residential areas, a reduction in the number of buildings available for commercial/business use which might meet demand for good quality smaller premises and a reduction in the vitality and viability of the local economy.

What does the sustainability appraisal say?

- 2.131** This policy option seeks to protect employment land and promote mixed-use and local business development within Lewisham. It seeks to promote sustainable development in employment locations in Lewisham. Ensuring that employment related development is considerate of mixed use opportunities and contributes to employment generation in the local community the environmental impacts will likely produce a substantially beneficial outcome for Lewisham. It may contribute to sustained economic growth, promote employment and new enterprises, promote social inclusion and ensure equitable outcomes for the community. Additionally, by specifically addressing sustainable environmental outcomes and transport accessibility, the pollution impacts of vehicle transportation, air quality and natural resource use are addressed for the borough. The allocation for seeking contributions for education/training may also have benefits for improved education, training and skills for the population in Lewisham.
- 2.132** Enhancement, regeneration and new development of existing buildings will require resources for construction and operation of the buildings. Materials will need to be sourced and transported to the site and construction waste will be produced in the process. These adverse impacts will however be short term. Implementation of appropriate sustainability considerations will need to be undertaken to ensure that growth in employment locations will not have adverse local impacts on resource use, climate change contribution and waste generation as this may have an adverse impact on the health and wellbeing of the local population.
- 2.133** The alternative is likely to have similar impacts as the recommended policy option. However, the granting of residential development on employment locations may result in a depletion of available land for commercial/business which impacts on local economic growth and employment opportunities. Specifically it may lead to a greater reduction in the number of buildings/spaces which may meet the demand for good quality smaller premises for SME opportunities which would impact on the vitality and viability of the local economy. Additionally, it may result in a depletion of services in residential areas for the local population.
- 2.134** The alternative of relying on the London Plan and Core Strategy has similar beneficial and adverse impacts. However, the comprehensive detail in the policy option is based on local information and should allow for greater certainty for developers which will assist in clarity in implementation.

2.13 Town centre vitality and viability

What is the aim of this policy option?

- 2.135** The aim of this policy option is to support the vitality and viability of town centres which are at the heart of Lewisham's communities. Town centres provide the focus for retailing activities, as well as entertainment, leisure and night-time uses within the borough and the Council actively supports a range of appropriate uses to ensure their continued health and ongoing vitality and viability.

Council's recommended option 11

Town centre vitality and viability

1. Proposals within a designated town centre, as shown on the Policies Map, will be resisted unless the viability and vitality of the town centre is sustained and enhanced through the:
 - a. provision of a mix of uses to encourage a range of uses through the day and evening
 - b. incorporation of design principles such as active frontages at ground floor and effective street lighting with a view to making the town centre a safer place and
 - c. provision of high quality shopfronts, in accordance with DM Option 18.

Justification

- 2.136** The NPPF directs local authorities to pursue policies to support the vitality and viability of town centres. This option supports healthy town centres by encouraging a range of uses in a safe and attractive environment. It supports the implementation of Core Strategy Policy 6 and Core Strategy Policy 15 which relate to retail and high quality design respectively. This approach is also supported by the London Plan, particularly Policy 7.3 (Designing Out Crime) and Policy 7.5 (Public Realm) which encourage the use of design to improve the quality and safety of buildings and places.
- 2.137** Promoting mixed use development is one of the twelve core planning principles set out in the NPPF that should underpin both plan-making and decision-taking. The London Plan broadly supports this approach by supporting safe neighbourhoods with easy access to services and facilities (Policy 7.1: Building London's Neighbourhoods and Communities). Focusing new mixed use schemes in the town centres will support the growth of the centres and provide accessible goods and services to local people. Locations outside of designated town centres but with good public transport connections in close proximity may also be acceptable locations for mixed use developments.
- 2.138** The London Plan Policy 7.3 encourages a mix of land uses that maximise activity through the day and night to create safe environments. In addition to shops, a range of uses will attract a variety of visitors throughout the day and into the evening. Encouraging the evening economy contributes to a safe and vibrant centre, particularly after shops close for the day.
- 2.139** The Council expects high quality design and shopfronts which positively contribute to a safer and more attractive town centre environment. The design of new shopfronts and alterations to existing shopfronts is important to the appearance of individual properties, to the character and appearance of shopping areas, and provides visual connections between ground floor shops and the street. DM Option 18 provides further guidance on the design of shopfronts.

- 2.140** The speculative development of retail units, office space and other employment generating uses will not be acceptable. To ensure that any development is deliverable and in order to avoid long-term vacancies, the Council will require developers to secure end users prior to the commencement of development.

Alternative option/s 11

It is not considered there are alternatives for this option as supporting the vitality and viability of town centres is a key aim of the NPPF and local authorities are directed to pursue policies to support this.

What does the sustainability appraisal say?

- 2.141** The sustainability appraisal identified likely long term socio-economic benefits for Lewisham however it also identified potential adverse impacts in relation to the resources required for the construction, operation and maintenance of the town centres. Adverse impacts relating to construction materials and waste will be short term however the ongoing maintenance of a vibrant town centre is likely to require increased resource use such as heat, energy, and water, resulting in longer term adverse impacts. Mitigation through the design and operation of town centres could reduce the long term impacts of growth, resource use and waste production.

2.14 Location of main town centre uses

What is the aim of this policy option?

- 2.142** The aim of this policy option is to focus main town centre uses within the major and district centres. The health of Lewisham's major and district town centres depend on a range of shops and other town centre uses concentrated on the centre. Town centre uses outside these locations could adversely impact the growth of existing centres and these impacts should be thoroughly assessed before planning permission is considered.

Council's recommended option 12

Location of main town centre uses

1. The location of main town centre uses needs to be in accordance with Core Strategy Policy 6. For major retail development (over 1,000 square metres), if suitable sites are not available in the major and district centres then edge of centre sites should be considered, followed only then by out-of-centre sites in locations that are accessible by public transport, walking and cycling and are well connected to the town centre.
2. Proposals for retail provision of 1,000 square metres gross floorspace or more on the edge or outside of the major and district centres will require an impact assessment and will only be considered if the following criteria are satisfied:
 - a. there is a quantitative and qualitative need for the proposal
 - b. there are no other sites available in accordance with the sequential test
 - c. the proposal, either by itself or together with other recently or committed developments, would not demonstrably harm the vitality and viability of an existing shopping centre
 - d. the proposal is of an appropriate scale in relation to the size of the centre and its role in the hierarchy of centres
 - e. the proposal is sited so as to reduce the number and length of car journeys and can serve not only car journeys but also those on foot, bicycle or public transport
 - f. the proposal is not on designated employment land as shown on the Proposals Map and for which a demand can be established and
 - g. if planning permission were to be granted then a planning obligation may be negotiated.

Justification

- 2.143** The NPPF promotes 'competitive town centre environments' and recognises that town centres are integral to communities and therefore their viability and vitality should be supported. One way of positively contributing to town centres is by encouraging major development within the centres and restricting it in locations outside centres which would divert visitors and trade. London Plan Policy 4.7 (Retail and Town Centres) supports this approach.
- 2.144** The NPPF requires the application of the sequential test for planning applications proposing main town centre uses that are not in an existing centre. This is supported by Core Strategy Policy 6 which states that major development should be located within the major and district centres and, if not, proposals would require assessment against the sequential test.

- 2.145** The sequential test will apply and applicants will be required to submit an impact assessment for applications on the edge of or outside town centres that exceed the locally set floorspace threshold of 1,000 square metres. An assessment of the locally set threshold is set out in the Supplementary Report to Lewisham's Retail Capacity Study 2009 (September 2010) which concludes that 1,000 square metres is an appropriate local threshold for Lewisham.
- 2.146** The Council sees 'suitable sites' as also being viable and available and in deciding on an appropriate location for major retail development these factors should be assessed.

Alternative option/s 12

The alternatives associated with this option are limited as the application of the sequential test is required by the NPPF. Flexibility regarding the requirement for an impact statement depends on a locally set floorspace threshold. An alternative associated with this option could include:

1. Not setting a local threshold and relying on the 2,500 square metre default threshold set out in the NPPF.

What does the sustainability appraisal say?

- 2.147** The sustainability appraisal identified that there are likely to be long term benefits for the community through improved accessibility. Using sustainable modes to access centres may also have longer term benefits for the environment. Large scale developments, regardless of their location, are likely to result in increased resource use and production of waste. Depending on their location there may also be adverse effects for biodiversity, open spaces and potentially the local townscape. Temporary adverse effects on air and noise quality during construction were also identified.
- 2.148** The alternative option sets the threshold for an impact assessment at 2,500 square metres which would result in less developments with potentially significant effects being assessed. This reduced level of assessment may result in long term adverse effects on the environment and possibly on community wellbeing.

2.15 District centres primary and secondary frontages

What is the aim of this policy option?

2.149 The aim of this policy option is to protect shops (A1 Use Class) and therefore the primary retail function of the the district centres. After the major centres (Lewisham and Catford), the seven district centres, Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham, contain the largest concentration of retail in the borough and this important role should be protected.

Council's recommended option 13

District centres shopping frontages

1. Within the primary shopping frontages of the Blackheath, Deptford, Downham, Forest Hill, Lee Green and Sydenham district centres (as shown on the Policies Map), the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:
 - a. not harm the predominant retail character of the shopping frontage
 - b. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together and 70% of A1 uses maintained in the primary shopping frontage
 - c. generate a significant number of pedestrian visits, thereby avoiding the creation of an area of relative inactivity in the shopping frontage
 - d. occupy a vacant unit, having regard to both their number within the district centre as a whole and the primary frontage and the length of time the unit has been vacant
 - e. not introduce a residential use at ground floor level, and
 - f. not result in adverse effects caused by crime, disorder and anti-social behaviour.

2. Within the secondary shopping frontages of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Policies Map) the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would:
 - a. introduce an A2, A3, A4, A5 or D2 use
 - b. not harm the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
 - c. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together
 - d. not harm the retail character, attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units
 - e. retain an appearance which is compatible with adjoining shop units including window presentation
 - f. provide an active frontage at ground floor level
 - g. not introduce residential uses at ground floor level.

Council's recommended option 13

Cont...

3. Outside the primary and secondary shopping frontages areas of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Policies Map) the Council will consider applications for development or a change of use from a ground floor shop (Class A1) where the following are met:
 - a. the amenity of adjoining properties is not harmed
 - b. the character, attractiveness, vitality and viability of the centre as a whole is not harmed
 - c. in the case of a change to a residential use, the proposal would not result in a harmful break to the continuity of the retail frontage.

Justification

- 2.150** The NPPF directs local authorities to define the primary and secondary frontages within centres and set policies that make it clear which uses will be permitted in the primary and secondary frontages. Core Strategy Policy 6 refers to the frontage designations to ensure essential services are maintained and contribute to the vitality and viability of the centres.
- 2.151** A review of the extent of the primary and secondary frontages was undertaken and reported in the Supplementary Report to Lewisham's Retail Capacity Study 2009 (September 2010) and a number of recommendations were made which are now reflected on the Policies Map.
- 2.152** While a wide range of uses are located in the district centres, their primary function is shopping and this should remain the principle land use. In seeking to retain the retail function the Council will strongly resist proposals for a change of use from A1 retail to another use. Uses other than A1 retail will only be considered where the predominant retail character is not unduly harmed.
- 2.153** The Council recognises that in order for town centres to be successful and competitive they must provide customer choice and a diverse retail offer. While it is important that a critical mass of retail uses are maintained within the primary shopping area, a more flexible approach is taken within the secondary shopping frontages where a range of other town centre uses may be appropriate. In particular, restaurants, cinemas, businesses, community uses, banks, policing facilities, building societies, employment centres, advice centres and other health and welfare services may be appropriate.
- 2.154** To help maintain the predominant retail character and vitality and viability of the primary shopping area, the Council will seek to achieve a target of 70% A1 retail uses in the primary frontages of the district centres. The Council's 2011 district centre retail survey showed a range from 42% to 75% for the number of A1 uses in the primary frontages. In order to protect and promote the primary retail function of the centres the Council considers a target of 70% is appropriate. While some the percentage of A1 uses in some centres is currently below 70%, as a target it is not considered unrealistic and if achieved would help support a healthy district centre.

- 2.155** It is acknowledged that certain types of uses (such as hot food take-aways (A5) and betting shops) can cause detrimental impacts as a result of their location or concentration. The Council will resist proposals that would result in an unacceptable concentration of such uses in one area, detrimentally affect amenity or result in adverse effects arising from crime, disorder or anti-social behaviour.
- 2.156** Town centre areas located outside both the primary and secondary frontage generally contain a much greater variety of uses and therefore a much more flexible approach to the change of use will be encouraged. This includes a change of use back to residential in appropriate locations and where it would not result in an unreasonable break in the shopping frontage.

Alternative option/s 13

An alternative associated with this option could include:

1. The percentage of A1 uses in primary shopping frontages in the district centres ranges from 42% to 75%. Blackheath, 58%; Deptford, 75%; Downham, 75%; Forest Hill, 42%; Lee Green, 52%; Sydenham, 67%. One option could be to set the percentage of A1 uses in the primary shopping frontage at levels that are specific to individual centres, based on the existing percentages.
2. The percentage of A1 uses in secondary frontages in the district centres ranges from 35% to 63%. Blackheath, 48%; Deptford, 42%; Downham, 63%; Forest Hill, 43%; Lee Green, 45%; New Cross & New Cross Gate, 35%; Sydenham, 51%. One option could be to set the percentage of A1 uses in the secondary shopping frontage at levels that are specific to individual centres, based on the existing percentages.
3. The average percentage of A1 uses in secondary frontages in the district centres is 47%. One option is to set a blanket percentage of A1 uses in the secondary shopping frontages at or close to this figure, 50% for example.

What does the sustainability appraisal say?

- 2.157** The sustainability appraisal showed that the recommended policy option is likely to promote economic growth within district centres and may encourage and promote employment and enterprises across Lewisham. The policy option may result in benefits to the local population and human health with improved community safety, conservation of heritage assets and promote social inclusion. The focus on retail and other commercial spaces may impact on housing options in the borough however in the context of other policy options the impact may be minor. The focus on the primary retail function of the centres may result in some minor negative impacts on climatic factors from residents to travelling.
- 2.158** Alternative options 1 and 2 are likely to have similar impacts as the policy option. Alternative option 3 is likely to have negative impacts as a detailed assessment is lacking.

2.16 Neighbourhood local centres

What is the aim of this policy option?

2.159 The aim of this policy option is to retain shops (A1 Use Class) in order to protect the existing neighbourhood local centres and ensure the on-going provision of an adequate range of shops that meet the daily needs of the local community. The five neighbourhood local centres, Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, play an important role in the retail hierarchy by providing for the everyday needs of the community.

Council's recommended option 14

Neighbourhood Local Centres

1. Within the designated neighbourhood local centres of Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, the Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.
2. A change of use to non-A1 uses will only be considered if the following criteria are satisfied:
 - a. a high standard of design and appropriate layout is achieved, including high quality shopfronts, in accordance with DM Option 18
 - b. provision of an attractive window display
 - c. reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent
 - d. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)
 - e. a balance to the number and type of units within the centre (where 40% of A1 uses are maintained)
 - f. there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
 - g. there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation
 - h. that adequate provision for access for people with disabilities is made and
 - i. the use would not result in adverse effects caused by crime, disorder and anti-social behaviour.
3. A change of use to residential at ground floor will only be permitted at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage.

Justification

2.160 Neighbourhood local centres complement Lewisham's larger town centres and play an important role in providing an adequate range of local shops to meet the day-to-day needs of residents across the borough. These centres provide locally accessible facilities that are particularly important for the elderly, people with mobility difficulties and those who can not easily reach the larger centres.

- 2.161** In accordance with London Plan Policy 4.8 (Supporting a Diverse and Successful Retail Sector) and Core Strategy Policy 6, the Council will seek to retain accessible retail uses in neighbourhood local centres and will only consider a change of use where marketing evidence shows that there is no economic prospect of such uses continuing. The Council realises the value in the role of the neighbourhood local centres as accessible locations providing for the daily needs of residents. Therefore proposals for the change of use of an existing retail unit must show that there are other essential daily goods and services within a short walking distance.
- 2.162** In considering whether there is adequate provision of alternative shopping facilities within walking distance, the Council will whether the shops provide for the everyday needs of residents, including the provision of convenience stores, chemists, post offices, news agents, dry cleaners, hairdressers and laundrettes.
- 2.163** The Council will always seek to maintain a balance of uses within a parade as certain types of uses (such as hot food take-aways (A5) and betting shops) can cause detrimental impacts as a result of their location or concentration. The Council will resist proposals that would result in an unacceptable concentration of such uses in one area, detrimentally affect amenity, or result in adverse effects arising from crime, disorder or anti-social behaviour.
- 2.164** The Council's 2012 neighbourhood local centre survey showed a range in the number of A1 units in each centre (from 33% to 44%) and an average of 37% A1 uses. In order to protect the provision of local shops, particularly the provision of essential daily goods, the Council will always seek to maintain 40% of A1 uses. While some the percentage of A1 uses in some centres is currently below 40%, as a target it is not considered unrealistic and, if achieved, would help support a healthy district centre.
- 2.165** A number of local shops have been converted to residential in recent years. Where these changes occur in the middle of the parade, the result is a fragmented shopping strip. To avoid this, the Council will seek to reduce the interruption by directing residential conversions to the ends of the shopping parade, but not to corner shop units, regardless of whether there are existing breaks mid-parade. Corner shop units often make an important contribution to the local streetscape through their character and design, even when they exist in isolation, and should be retained.
- 2.166** Design techniques should be employed which result in high quality frontages which reflect the existing design of any upper floors, achieve a high standard of amenity for occupants and do not materially harm the character of the street.

Alternative option/s 14

An alternative associated with this option could include:

1. Exclude 2(d) from the assessment criteria, which would not require similar shops to be within walking distance. This could allow additional shops to convert from A1 uses to other uses and it may negatively impact on the provision and accessibility of essential daily goods.

What does the sustainability appraisal say?

- 2.167** The sustainability appraisal showed that there are likely to be long term positive effects on community wellbeing through increased access to services and reducing deprivation. There may be long term positive effects on climate change mitigation through reducing the need

for local residents to travel. Future developments are likely to produce construction waste and associated noise and vibration which may result in short term adverse impacts on waste production and human health.

- 2.168** The alternative option may result in shops being less accessible to part of the community which is likely to have long term impacts on local wellbeing, increase deprivation and potentially increase car use and travel, which may have adverse impacts on the environment.

2.17 Local shopping parades and corner shops

What is the aim of this policy option?

- 2.169** The aim of this policy option is to protect shops (A1 Use Class) in the local shopping parades in order to provide for the day-to-day needs of local residents and supplement the facilities available in other larger shopping centres. The Council needs to protect the local shopping parades to ensure everyone, particularly the elderly and those with mobility difficulties have access to a range of goods.

Council's recommended option 15

Local shopping parades and corner shops

1. The Council will require the retention of Class A1 shops located in a local shopping parade or operated as a corner shop in order to preserve or enhance the local character and support the provision of essential daily goods and services, unless an applicant can demonstrate:
 - a. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)
 - b. a balance to the number and type of units within the parade
 - c. that reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent
 - d. the replacement use will result in no harm to the amenity of adjoining properties
2. A change of use to residential at ground floor will only be permitted at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage.

Justification

- 2.170** There are over 80 local shopping parades within the borough and they vary in size and the range of shops available. The main function of local shopping parades is providing for the daily needs of local residents and the Council seeks to protect this function.
- 2.171** The Council will always seek to maintain a balance of uses within a parade as certain types of uses (particularly hot food take-aways (A5) and betting shops) can cause detrimental impacts as a result of their location or concentration. The Council will resist proposals that would result in an unacceptable concentration of such uses in one area, cause disturbance or detrimentally affect amenity.
- 2.172** Marketing evidence will be required for proposals to change the use of existing retail units. The applicant is required to demonstrate that similar alternative shops are within walking distance, there is a healthy mix of uses existing within the parade, and that the amenity of adjoining properties is not adversely affected.
- 2.173** A number of local shops have been converted to residential in recent years. Where these changes occur in the middle of the parade, the result is a fragmented shopping strip. To avoid this, the Council will seek to reduce the interruption by directing residential conversions to the ends of the shopping parade, but not to corner shop units, regardless of whether there are existing breaks mid-parade. Corner shop units often make an important contribution to the local streetscape through their character and design, even when they exist in isolation, and should be retained.

- 2.174** Design techniques should be employed which result in high quality frontages which reflect the existing design of any upper floors, achieve a high standard of amenity for occupants and do not materially harm the character of the street.

Alternative option/s 15

An alternative associated with this option could include:

1. An additional criteria, expanding on 1(b), where various types of uses are restricted, for example proposals for hot food take-aways and betting shops will be resisted where they are in proximity (400 metres or less) to schools or sensitive community facilities.

What does the sustainability appraisal say?

- 2.175** The sustainability appraisal showed that there are likely to be long term positive effects on community wellbeing through increased access to services and reducing deprivation. There may be long term positive effects on climate change mitigation through reducing the need for local residents to travel. Future developments are likely to produce construction waste and associated noise and vibration which may result in short term adverse impacts on waste production and human health.
- 2.176** The option to restrict various types of development may adversely impact on the local economy however the benefits to community safety and well-being has the potential to balance this out.

2.18 Restaurants and cafes

What is the aim of this policy option?

- 2.177** The aim of this policy option is to manage the potentially negative effects that can arise from restaurants, cafés and other food and drink shops. While these uses make an important contribution to a vibrant town centre and shopping area and draw visitors to centres they can also create negative impacts that need to be managed.

Council's recommended option 16

Restaurants and cafés (A3 uses) and drinking establishments (A4 uses)

1. The Council will consider proposals for restaurants and cafés (A3) and drinking establishments (A4) provided the following are met:
 - a. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area
 - b. there is no harm to the living conditions of nearby residents, including that created by noise and disturbance from users and their vehicles, smell, litter and unneighbourly opening hours
 - c. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians
2. In addition, applicants will be expected to provide acceptable arrangements for:
 - a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
 - b. the collection, storage and disposal of bulk refuse and customer litter
 - c. sound proofing, especially if living accommodation is above or adjacent
 - d. the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00 am to 11.00 pm in neighbourhood local centres and local parades.

Justification

- 2.178** The Council acknowledges the important role that food and drink shops play in contributing to the vibrancy and vitality of town centres, particularly to the night time economy. However, it is also acknowledged that these uses can create negative impacts for nearby residents. Where new food and drink premises are established, the Council seeks to control and minimise these impacts.
- 2.179** The London Plan (Policy 4.6) encourages boroughs to influence the night time economy, particularly in relation to the use classes, time of operation, size of premises and proportion of retail frontage. Lewisham's Core Strategy (Policy 6) further details that secondary frontages in particular will help provide for uses that are appropriate to the night time economy. This policy option should be read in conjunction with DM Options 13, 14 and 15 which relate to the retention of shops (A1 uses).

- 2.180** This policy option seeks to manage potential negative impacts, particularly in relation to noise, smell and litter, as well as impacts on the road network. Applicants will be expected to provide details of how these impacts will be managed, along with the proposed opening hours.

Alternative option/s 16

An alternative associated with this option could include:

1. A new criteria 1(d) stating that the proposals for restaurants, cafes and drinking establishments in the town centres and local parades will not exceed 15% of the number of units in that centre/parade.

What does the sustainability appraisal say?

- 2.181** The sustainability appraisal showed that the policy option promotes enterprise within Lewisham and is likely to have a long term positive effect on employment and the local economy. The policy option is likely to reduce adverse impacts such as noise and anti-social behaviour although implementation and monitoring will be critical.

2.19 Hot food take-away

What is the aim of this policy option?

2.182 The aim of this policy option is to prevent the establishment of new hot food take-away shops in close proximity to primary and secondary schools. In areas further away from schools, the policy option seeks to limit the number of hot food take-aways. While hot food take-aways make up a significant number of the borough's retail units and can, as part of a mix of uses, make an important contribution to a vibrant town centre and shopping area, they can also have a negative impact on human health. The Council seeks to address the health impacts of hot food take-aways while also managing potential environmental impacts.

Council's recommended option 17

Hot food take-away shops (A5 uses)

1. The Council will not grant planning permission for new hot food take-away shops (A5) that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).
2. The Council will only consider granting planning permission for new hot food take-away shops (A5) outside of the exclusion zone where:
 - a. the percentage of hot food take-aways (A5) in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10%
 - b. the number of hot food take-aways (A5) in Local Parades of nineteen units or less does not exceed one hot food take-away shop
 - c. the number of hot food take-aways (A5) in Local Parades of twenty or more units does not exceed two hot food take-away shops
 - d. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area (in accordance with DM Option 18 - Shopfronts)
 - e. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and
 - f. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.
3. In addition, applicants will be expected to provide acceptable arrangements for:
 - a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
 - b. the collection, storage and disposal of bulk refuse and customer litter
 - c. sound proofing, especially if living accommodation is above or adjacent and
 - d. the impact on neighbours of the proposed opening hours, which will normally be restricted to 8.00 am to 12 midnight in the district centres and 8.00 am to 11.00 pm in neighbourhood local centres and local parades.

Justification

England has one of the highest rates of obesity in Europe and in the developed world. The Department of Health (Healthy Lives, Healthy People, 2010) acknowledges that overweight and obesity is one of the most widespread threats to health and wellbeing in the country and that there is a link between excess body weight and diseases such as type 2 diabetes, cancer and heart disease.

The Foresight report *Tackling Obesity: Future Choices* (2007) states that diet is one of the key determinants of obesity levels and hot food take-aways are a source of cheap, energy-dense and nutrient-poor food. This means they tend to be high in fat and sugar but low in vitamins and nutrients. Increasing access to healthy foods while also limiting access to unhealthy foods are ways that local authorities can influence environmental factors that affect health and wellbeing. The Department of Health also highlights the importance of the use of planning powers in shaping the built environment and acknowledges that the planning system can be used to limit the growth of take-aways.

The NPPF requires local authorities to promote healthy communities, use evidence to assess health and wellbeing needs and work with public health leads and organisations. Paragraph 69 acknowledges the important role that planning can play in facilitating social interaction and creating healthy, inclusive communities.

The London Plan (Policy 3.2) directs boroughs to promote the health and well-being of communities and identify and address significant health issues, for example by increasing access to healthy foods and developing local policies to address concerns over the development of fast food outlets close to schools.

Lewisham's Core Strategy (Policy 12) promotes and supports local food growing and urban agriculture which is one way to increase access to healthy food, however the Council is also concerned about restricting access to unhealthy foods. The Council encourages all take-aways shops to source their food from ethical and sustainable suppliers.

The Foresight report also found that obesity levels tend to be higher in deprived areas than in wealthy areas and the National Obesity Observatory has found that there is a strong association between deprivation and the density of fast food outlets, with more deprived areas having more fast food outlets per population. A recent UK review of 33 studies looking at the location of take-away shops points out "*[m]ost of the studies have found a positive association between availability . . . of fast-food outlets and increasing deprivation . . . This is an important issue to highlight to policy decision makers as land use restrictions on new fast-food outlets may help to stop the 'deprivation amplification' effect*"⁽¹⁵⁾

The Council's retail surveys (2011 and 2012) show that there are 282 hot food take-away shops across the borough and the National Obesity Observatory research shows that Lewisham has the thirteenth highest density of hot food take-away shops per head of population in England. Lewisham is also the 39th most deprived borough in the country, with 8 out of 166 Super Output areas in the 10% most deprived and 64 in the 20% most deprived.

Given local and Government concerns about the impact of hot food take-aways on human health, and the combination in Lewisham of an over-concentration of take-away shops and high levels of deprivation, the Council seeks to manage the development of new hot food take-away premises in the borough.

Childhood obesity is a growing threat to children's health and Lewisham has a high proportion of children identified at risk of obesity. Additionally, the Department of Health (*Healthy Lives, Healthy People*, 2010) finds that obese children are more likely than children of a healthy weight to become an obese adult with associated health problems later in life. Obesity in school children in Lewisham is significantly higher than the England average and results for 2010/2011 show that 11.1% of Reception children and 24.4% of children in Year 6 are obese in Lewisham, compared to 9.4% of Reception children 19% of Year 6 children in England.

15 Fraser et al. (2010) "The Geography of Fast Food Outlets: A Review" in *International Journal of Environmental Research and Public Health*, 7, pp2290-2308

The Council considers that restricting children's access to take-away shops is one way that the Council can discourage unhealthy eating and seek to stop the rising levels of obesity in the borough. For these reasons, when considering applications for hot food take-away shops, the proximity of the site to schools will be considered and in order to reduce access to fast food outlets by children, applications for hot food take-aways within easy walking distance (400 metres or less) of primary and secondary schools will be resisted.

Where hot food take-away shops are proposed more than 400 metres from a school, the Council will have regard to the number of existing hot food take-away premises in the immediate area. The Council will not permit more than the relevant percentage in the centre/parade to be occupied by A5 uses. The relevant percentages are based on the Council's 2011 major and district centre surveys which showed that close to 5% of shops are occupied by A5 uses and the 2012 local centre survey which showed that an average of 10% of units were occupied by A5 uses.

The 2011 local parades survey shows a wide variation in the percentage of A5 units that make up the total number of a parade, with the average at 12%. There are over 80 local parades across the borough that vary greatly in size, from 4 units to 59 units and the number of take-away units also vary greatly, from no take-aways in 22 of the parades, increasing to 43% of units in one particular parade. Given this wide variation it is not considered appropriate to apply the average percentage to all parades and a more tailored response, relating to the number of units and the size of the parade is considered appropriate.

Potentially negative environmental impacts, particularly in relation to noise, smell and litter, as well as impacts on the road network should be controlled and where new take-away premises are proposed, the Council seeks to control and minimise these impacts.

Alternative option/s 17

An alternative associated with this option could include:

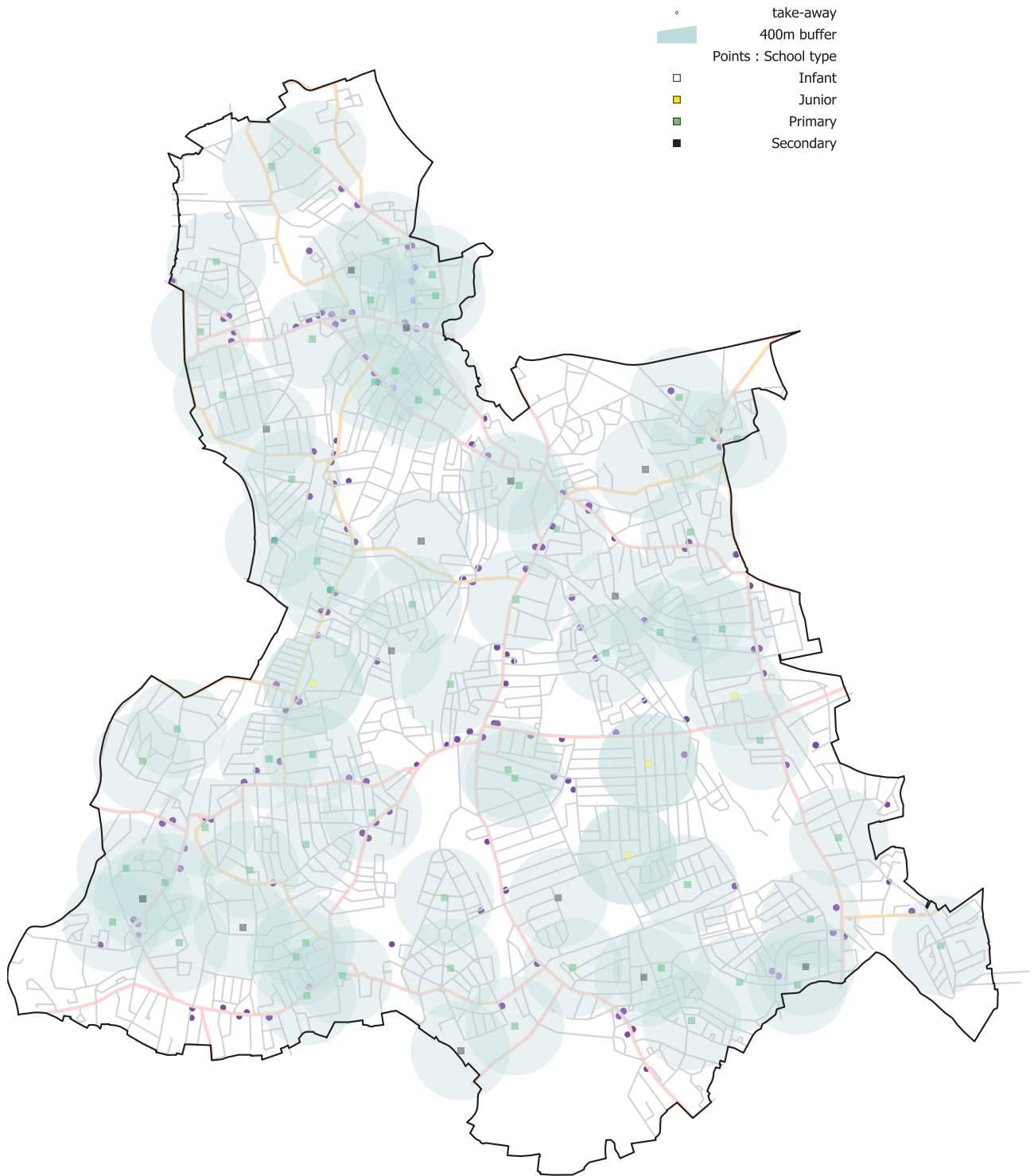
1. Set the percentage of A5 uses in a shopping area to a blanket percentage of 10%, regardless of the type of centre/parade.

What does the sustainability appraisal say?

The sustainability appraisal showed that there are likely to be beneficial impacts on the local population in terms of human health and addressing health inequalities in the borough. Part 3 of the policy option, aimed at managing the potential environmental impacts of A5 development, may also have potential beneficial effects on the local population. Adverse impacts from the restriction of new A5 enterprises in the borough may arise, which could have minor negative effects on economic growth in the borough. It is likely that the adverse impacts would be off-set by the availability of space for other retail uses.

The alternative option provides less of a restriction in development of hot food take-aways in the different types of shopping centres and parades in Lewisham. As the borough already has a significantly higher density of A5 uses and incidences of obesity, this alternative may lead to increased development of hot food take-aways leading to an increased negative impact on the health of the local population and subsequently health inequalities.

Figure 2.1 Take away 400 metre exclusion zone



2.20 Shopfronts, signs and hoardings

What is the aim of this policy option?

- 2.183** The aim of this policy options is ensure that shopfronts are well designed and relate well to the scale and character of the original building and surrounding area. Shopfronts are frequently changed or renewed and it is important that they make a positive contribution to the appearance of an individual property as well as to the character and appearance of the shopping area as a whole.

Council's recommended option 18

Shopfronts, signs and hoardings

1. Shopfronts should be designed to a high quality and reflect and improve the character and quality of their surroundings. This will be achieved by the following:
 - a. retention of high quality shop fronts both within and outside Conservation Areas. This includes retention of original fascia, pilasters and columns including where shops units are combined. Where retention is not possible replacements should use high quality materials and use a design appropriate to the period and character of the building
 - b. new shopfronts and the replacement of non-period shopfronts should use high quality materials and use a design that relates well to the proportion, scale and detailing of the entire host building and makes a positive contribution to the streetscape. Where possible existing original pilasters, brackets and fascia should be retained and new shopfronts should relate well to these features
 - c. new shop signs should relate successfully to the architectural features and detailing of the building. Architectural features such as cornices, pilasters and columns should not be obscured
 - d. provision of separate access to any residential accommodation on other floors and encourage the restoration of such access if already removed
 - e. provision of suitable access for people with disabilities in new shop fronts
 - f. provision of storage for refuse bins where possible
 - g. refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and character of an area
 - h. roller grilles and shutters for security purposes should be of an open mesh variety leaving the shop window visible, with the box for any grille or shutter contained behind the fascia where possible
 - i. within Conservation Areas and residential areas, internally illuminated box signs and projecting signs will not be permitted unless they are successfully related to the design and detailing of the building and positively contribute to the special character of a group of buildings or the street.
2. The Council will not grant planning permission for the display of poster hoardings which are considered to be out of scale and character with the building/site on which they are displayed. Temporary hoardings may be suitable for some form of public art.

Justification

- 2.184** Lewisham's shopping areas are an important part of the community. They often have their own distinctive character and history (see Lewisham's Borough Wide Character Study, 2010). Well designed shopfronts of architectural or historic interest make an important contribution to the character and appearance of an area and the borough as a whole. Good examples of shopfronts should be retained wherever possible.
- 2.185** The Council will seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. The standardisation in much of current shop design can gradually devalue the character and individual qualities of buildings in shopping areas. It is important that the design and materials of new and replaced shopfronts relate well to the scale of the building and surrounding buildings as well as the original features of the building and improve and enhance the setting and character of the area.
- 2.186** The Council considers that the design and quality of shopfronts can be maintained by referring to the architecture of the host building and neighbouring units and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character and attractiveness of the centre or parade it is located in. The detailing, quality of materials, execution and finishes are very important in shopfront design as they are viewed close-up.
- 2.187** Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all. If a shopfront is replaced or altered, the design should respect the characteristics of the host building and, where appropriate, shopfront windows and framework features, such as pilasters, brackets and fascias should be retained or restored.
- 2.188** Poster hoardings that are out of keeping with the street scene can be intrusive and inappropriate to the character of the area and can lead to visual clutter. They may devalue the character and quality of both shopping and residential areas. Hoardings can be beneficial in screening unsightly area awaiting development and provide both public art and information about the nature of the development. NPPF para 67 supports this policy option.

Alternative option/s 18

It is not considered there are any alternatives for this option as the effects from poorly designed shopfronts on the character of an area must be appropriately controlled.

What does the sustainability appraisal say?

- 2.189** The sustainability appraisal showed that improving the aesthetic appeal of the centres is likely to have indirect long term positive effects for the the economy and for the general wellbeing for local residents. Incorporating sensitive design into shopfronts is likely to result in long term positive effects to townscape and cultural heritage assets.
- 2.190** Short term adverse effects are likely in relation to waste production and resource use. Short term adverse effects are likely in relation to air quality and fossil fuel use from sourcing and transporting materials. There are also likely to be short term adverse effects in construction related noise and disturbance.

- 2.191** In the absence of this policy option and detailed guidance in the Core Strategy, adverse impacts may arise from shop fronts that detract from the townscape and further indirect socio-economic effects.

2.21 Public Houses

What is the aim of this policy option?

2.192 The aim of this policy option is to prevent the loss of public houses or pubs unless robust evidence is provided to justify the loss and the proposed change of use has been adequately assessed as suitable. In recent years, the loss of many local pubs across the borough has been cause for concern. Lewisham's pubs are an important community resource. Pubs can provide a central focus to an area or enhance the vitality of a residential neighbourhood. Pubs can be hubs for generating social interactions and can provide important space for community groups to meet. Some pubs are housed in buildings of cultural, architectural and historic value, which means their use as pubs may preserve important assets for citizens.

Council's recommended option 19

Public houses

1. The Council will only permit the change of use or redevelopment of a public house (A4) after an assessment of the following:
 - a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including the length of time the public house has been vacant, evidenced by the applicant of active and appropriate marketing for a constant period of at least 36 months at the existing use value
 - b. the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision, including evidence that the premises have been offered to use or to hire at a reasonable charge to community or voluntary organisations over a 12 month period and there is no longer a demand for such use
 - c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance
 - d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.
2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained, and for the ground floor to remain in use for a range of non-residential uses, including D1, as appropriate.
3. The proposed change of use of a public house for residential use will only be acceptable where:
 - a. the proposal has been assessed against parts 1c and 1d of this policy option and the impact of the proposal on these features and
 - b. where the Council is satisfied that residential use is acceptable, the accommodation to be provided is to be of the highest quality and meet the requirements outlined in DM Option 31 (Housing design, layout and space standards).

Justification

- 2.193** The NPPF (paragraph 70) identifies public houses as a community facility that contributes to enhancing the sustainability of communities and residential environments. As such, pubs should be safeguarded and retained for the benefit of the community and planning policies and decisions should guard against the unnecessary loss.
- 2.194** This approach is supported by the London Plan (Policy 3.16 Protection and enhancement of social infrastructure) which cites the protection and enhancement of social infrastructure, which can include pubs. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.
- 2.195** The Council has prepared a report 'Pubs in Lewisham: an evidence based study' (2012) which draws together information about public houses in Lewisham and the UK and provides the evidence base for this policy option. The report shows there are currently 92 pubs in the borough down from 163 pubs in 1994, and during the period 2001 to 2011, 53 pubs were closed. This follows a national trend where pub numbers have been falling for many decades.
- 2.196** The General Permitted Development Order currently allows public houses (A4 Use Class) to change to some other uses including retail, professional and financial services, and restaurants without the need for planning permission. In instances where planning permission is required, the council will resist the loss of public houses as they fulfil the following important community role:
- a **social** role in supporting local community interaction and activities to help maintain sustainable neighbourhoods
 - an **economic** role in contributing to the vibrancy and vitality of shopping and commercial areas, and the vibrancy of residential areas contributing to a mix of land uses and
 - an **environmental** role in their intrinsic value to the cultural and historic heritage of local neighbourhoods.

Viability report

- 2.197** In order to ensure that the Council can make a sound assessment when a change of use is proposed, applicants will be required to submit a viability report. This will need to include:
- i. Evidence in the form of at least the last three trading years of audited accounts.
 - ii. All reasonable efforts have been made to preserve the public house (including all diversification options explored) and evidence supplied to illustrate that it would not be economically viable to retain the building or site for its existing use class. Examples of the initiatives or proposals that could be explored are as follows:⁽¹⁶⁾
 - adding a kitchen and serving food, or improving the existing food offer
 - making the pub, garden, food offer more 'family-friendly'
 - providing events and entertainment such as quiz nights, amplified or non-amplified live music, comedy/cabaret nights
 - hiring rooms out or otherwise providing a venue for local meetings, community groups, businesses, youth groups, children's day nurseries
 - offering take-away food and off-licence services
 - provision of bed & breakfast or other guest accommodation

¹⁶ This list is not exhaustive and not all ideas will apply to every public house

- sharing the premises with other businesses
 - altering opening hours.
- iii. Details should also be provided of any changes to the public house in the period that corresponds with the trading information plus 1 year beforehand (so 4 years in total) that may have impacted on the business. For example.⁽¹⁷⁾
- Did the opening hours alter so that the pub opened less often or less frequently?
 - Were any facilities (e.g. kitchen, darts board, pool table etc) removed or regular events (e.g. quiz) cancelled?
 - Was space for meetings redeveloped or were any local groups told they could no longer use the space?
- iv. The local planning authority will require evidence that demonstrates that the public house has been operated positively i.e. that it has not been run poorly in order to smooth the way for redevelopment. Applicants should be aware that local people/customers will provide anecdotal evidence in response to neighbourhood consultations on any planning application submission.
- v. Any ancillary use associated with a public house, such as accommodation for staff or otherwise, will need to be assessed as part of the viability report.

Marketing

2.198 The Council will require clear evidence of appropriate marketing to show a lack of demand for the pub. This will mean the submission of evidence showing the following:

- i. Details of the company/person who carried out the marketing exercise.
- ii. The marketing process should last for at least 36 months.
- iii. The asking price should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional RICS valuer with expertise in the licensed leisure sector and who is not engaged to market the property.⁽¹⁸⁾
- iv. The marketing exercise should be sufficiently thorough and utilise all available forms of advertising media and therefore include as a minimum:⁽¹⁹⁾
 - a For Sale/For Rent signboard
 - adverts in the local press
 - adverts in appropriate trade magazines/journals
 - adverts on appropriate trade websites
 - adverts through both national and local estate agents (including their websites) and
 - a targeted mail shot or email to an agreed list of potential purchasers.

Copies of all sales literature (and in the case of a signboard, dated photographs) will be required.

- v. Both freehold and leasehold options should be made available without a 'tie' requiring the purchase of drinks through the vendor and without restrictive covenants that would otherwise prevent re-use as a public house such that other pub operators, breweries, local businesses or community groups wishing to take over the premises and trade it as a pub are not excluded.

17 This list is not exhaustive and the local planning authority may seek evidence through standard community consultation procedures

18 The asking price(s) should be based on the valuation of the site as a trading pub without tie

19 Adverts should contain a similar amount of detail as a property listing in an estate agents

- vi. Copies of all details of approaches and offers should be provided together with full reasons as to why any offer has not been accepted.
- vii. As part of the community consultation exercise (see below), the public are to be informed about the marketing strategy and allowed the opportunity to put together their own bid.
- viii. Any attempts to sell the business at a price which reflects its current use should relate to the business in its entirety, and not to parts of it.

Local consultation and use of the public house by community and voluntary organisations

- 2.199** The use of pub space for community groups is a valued resource and evidence will be required demonstrating consultation has taken place with local community and voluntary organisations. The applicant will be required to carry out an assessment of the needs of the community for community facilities to show that the existing or former public house is no longer needed and that alternative provision is available in the area.
- 2.200** Where there is local need, this use should be retained or replaced within the building, unless an alternative approach can be identified and agreed. The retention of the ground floor for non-residential use will help maintain street activity and a mixed use neighbourhood.
- 2.201** The Council may also consider adding certain public houses to the Community Assets Register if the community support for their retention is significant.

Townscape, streetscape and historic significance

- 2.202** The townscape, streetscape and heritage significance of the pub building will need to be assessed, where relevant.
- 2.203** This will mean submitting a report prepared by a suitably qualified professional, and where the heritage significance needs to be assessed, the submission of a heritage statement assessing the heritage values of the building as set out in English Heritage's Conservation Principles: Policies and Guidance (2008), including a townscape appraisal. This report should be undertaken by a suitably qualified conservation professional and assess the following:
- i. The aesthetic merits of the building deriving from the quality of design, detailing, materials and craftsmanship, including its visual contribution to town- and streetscape of the area and any landmark qualities it may exhibit
 - ii. Any evidential value and significance the building may hold in terms of the development and social history of the area and its use.
 - iii. Any historical value the pub may hold by way of illustrating the intention of the builder or demonstrating aspects of use or social organisation; or association with an important organisation, patron, architect or historic event.
 - iv. Any commemorative or symbolic value the building may hold, or social value as a place that people perceive as a source of identity, distinctiveness, social interaction and coherence.
- 2.204** Where the building is deemed significant but the retention of the public house use is shown not to be economically viable, then the building itself or the identified significance will need to be retained. Where, after a full assessment, the Council considers a change of use appropriate, consideration will need to be given to DM Option 18 Shopfronts, where relevant.

Alternative uses

- 2.205** The Council will consider alternative uses for a public house only after the submission and assessment of the evidence and documentation outlined above. Non-residential institutions and assembly and leisure uses may be appropriate. The use of the building for residential use will need to provide the highest quality of accommodation.
- 2.206** The Council may consider the use of an Article 4 direction to protect a pub where the change of use or demolition of a pub would otherwise harm local amenity or the proper planning of the area.

Alternative option/s 19

An alternative for this option could include:

1. Reducing the 36 month time period specified in 1a. to 24 months
2. Not requiring a viability report to justify the loss of a public house
3. Not requiring a building to be retained if loss of the A4 use is deemed acceptable

What does the sustainability appraisal say?

- 2.207** The sustainability appraisal showed there may be minor positive impacts on population and human health through social inclusion and access to community infrastructure. There may also be minor positive impacts through the maintenance and enhancement of local townscapes and the promotion of employment opportunities in Lewisham. The policy option presents restrictions which may increase the cost of development leading to adverse effects on the local economy.
- 2.208** Alternative option 1 is likely to have similar impacts to the recommended policy option, however, the shorter timeframe would allow redevelopment of public houses which may reduce the financial pressure on developers. Alternative 2 is likely to have similar impacts to alternative 1 however there is an added minor negative impact through the potential greater loss of public houses to other use. Alternative 3 may have additional negative impacts on townscape/streetscape, and on air, water, waste and natural resources through increased new build work.

2.22 Mini cab and taxi offices

What is the aim of this policy option?

- 2.209** The aim of this policy option is to manage the operational effects of mini cab and taxi offices such as traffic and parking impacts, as well as potential noise disturbance, particularly from customers.

Council's recommended option 20

Mini cab or taxi offices

1. The Council will consider planning permission for mini cab or taxi businesses only in locations where they:
 - a. would not cause any adverse impact on the surrounding area by virtue of traffic congestion, including parking, which would be of detriment to the safety of other vehicle users, pedestrians and cyclists
 - b. are well lit and have good CCTV facilities and
 - c. would not have a detrimental effect on the amenities of adjoining property, especially residential occupiers, including that caused by noise disturbance.

Justification

- 2.210** The Council acknowledges the employment opportunities generated mini cab and taxi offices while also seeking to reduce any adverse impacts resulting from their operation. A mini cab or taxi office will involve vehicle movements, particularly arising from pick-ups and parking. The Council seeks manage the location of mini cab and taxi offices in order to limit any highway and traffic problems, including safety concerns.
- 2.211** The presence of an office open at night can improve security and provide natural surveillance, however it can also result queueing or waiting late at night which raises safety concerns. Therefore, in order to manage these effects, a well lit area with good CCTV facilities should be provided.
- 2.212** Mini cab and taxi offices often operate at night and can cause disruption to surrounding residents with frequent traffic movements, impact on parking and late night noise and disturbance. This policy option seeks to manage these effects by not granting planning permission for this use in locations where there would be a detrimental effect on the amenities of surrounding properties.

Alternative option/s 20

It is not considered there are any alternatives for this option as the effects arising from the operation of mini cab / taxi offices must be controlled.

What does the sustainability appraisal say?

2.213 The sustainability appraisal showed that this policy option has minor positive effects on the local population through enhancing community safety, health and well-being as well as maintaining the townscape aesthetic. There may also be minor positive effects from the encouragement of new enterprises. Minor negative effects as a result of this policy include the impacts associated with increased car travel on air and climate change. The Core Strategy does not explicitly provide guidance and the policy option provides clear direction for this type of development in the borough. This provides greater certainty in the implementation for developers.

2.23 Sustainable design and construction

What is the aim of this policy option?

- 2.214** The aim of this policy option is to ensure that development is environmentally sustainable. The use of measures such as passive design, the cooling hierarchy and environmental standards for the conversion and extension of existing buildings help to tackle climate change and reduce energy consumption and carbon emissions in the borough. Environmental sustainability is a core principle of the planning system.

Council's recommended option 21

Sustainable design and construction

1. The Council will require all developments to maximise the incorporation of passive design measures to manage heat gain and deliver passive cooling using the following hierarchy:
 - a. passive solar design to optimise energy gain and reduce the need for heating,
 - b. passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat,
 - c. mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical cooling followed by air conditioning, and
 - d. full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.
2. For conversions to residential from other uses, the Council will require cost effective and proportional energy efficiency measures to be carried out where feasible to a value not exceeding 10% of the overall construction costs.
3. For minor residential extensions, the Council will seek to deliver the highest BREEAM standard provision possible for the new part and will encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.
4. For non-residential extensions and conversions, the Council will seek to deliver the highest BREEAM standard provision possible for both the new and existing parts of the development. Evidence will be required to justify the standard proposed.
5. In relation to Core Strategy Policy 8 bullet 4, where industrial (B2 and B8) uses cannot achieve a minimum of BREEAM 'Excellent' standard, the Council will ensure that a minimum of 'Very Good' is achieved, scoring the maximum BREEAM points possible.

Justification

- 2.215** Recommended option 21 implements Core Strategy Policy 7 (CSP7) and Policy 8 (CSP8). These policies deliver the approach in the London Plan Policy 5.2 (Minimising carbon dioxide emissions), Policy 5.3 (Sustainable design and construction) and Policy 5.9 (Overheating and cooling) and are supported by the London Plan SPG: Sustainable Design and Construction, 2006. The recommended option is consistent with the principles identified in the NPPF (paragraph 95) that encourage better energy efficiency in buildings and the reduction of greenhouse gas levels.
- 2.216** Heating and cooling are the main energy consumers in buildings and they are required to adapt to the changing climate and provide occupants comfort by avoiding and mitigating overheating in summer. Passive solar design helps to optimise solar gains in winter to reduce

the need for space heating, ventilation and artificial lighting. Passive cooling design and natural ventilation helps to slow heat transfer and remove unwanted heat. The passive heating and cooling hierarchy used in the recommended option is set in accordance with London Plan Policy 5.9 to minimise energy consumption.

- 2.217 Core Strategy Policy 8 sets out the Councils sustainable design and construction requirements for new developments using the Code for Sustainable Homes (CSH) and Building Research Establishment Environmental Assessment Method (BREEAM) standards. Residential developments must deliver Level 4 CSH standard from 1 April 2011 and Level 6 from 1 April 2016, while non-residential developments must deliver BREEAM 'excellent' standard.
- 2.218 Parts 2 and 3 of the recommended option add to the Core Strategy policy by detailing the Councils approach to the delivery of energy efficiency measures in extensions and conversions to residential buildings. Measures could include upgrading loft insulation, insulating cavity walls, solid wall insulation, floor insulation, improving heating controls, hot water insulation, installation of low energy lighting (e.g. LED), Sustainable Urban Drainage Systems (SUDs) or upgrading the boiler. Note that planning permission may be required for solid wall insulation and SUDs.
- 2.219 The Council consider BREEAM to be a comprehensive and appropriate standard on which to base the assessment of new non-residential developments. However, it has become clear in the implementation of Core Strategy Policy 8 that it is not feasible for some B2 or B8 uses to achieve the 'excellent' standard of BREEAM in all circumstances. Specifically, the development of large empty industrial 'sheds' without a defined end user are not always able to meet the standard required. In these circumstances it may not be possible for the developer to meet enough of the required BREEAM criteria without 'fitting out' the units, which would then limit the number of potential end users. Therefore, the Council may accept a lower level of BREEAM standard, providing robust evidence including a BREEAM pre-assessment to support the reasoning, can be provided by the applicant.
- 2.220 Listed Buildings, buildings within a conservation area and heritage assets have to maximise energy efficiency and carbon reductions whilst protecting the historic and architectural value of a historic asset. Applicants undertaking extensions, conversion or refurbishment of designated heritage assets should give consideration to the energy efficiency requirements detailed in Recommended Option 35. English Heritage has published guidance on historic buildings and climate change to help in minimising carbon emissions by reducing energy consumption.⁽²⁰⁾

Alternative option/s 21

A reasonable alternative to the recommended option could be:

1. Relying on Building Regulations, London Plan Policy 5.4 and Policy 5.9, London Plan Sustainable design and construction SPG (2006, and forthcoming draft in 2012) and the Mayor's Climate Change Mitigation and Energy Strategy (2011) rather than a separate DM DPD policy.
2. For Part 3 of the recommended Option, do not encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.

20 More information can be found on "Climate Change and Your Home" at <http://www.climatechangeandyourhome.org.uk>

What does the sustainability appraisal say?

- 2.221** Recommended Option 21 promotes the incorporation of sustainable design into conversions, refurbishment and change of use developments within Lewisham. Implementation of the policy option is likely to have long term positive effects for the environment, with sustainable design and the adoption of BREEAM standards in construction promoting (both directly and indirectly) energy efficiency, waste reduction, climate change and flood risk adaptation, and biodiversity enhancement. Environmental improvements are likely to have indirect positive effects for human health and social cohesion within the community, which are likely to lead to potential economic benefits in the long term as Lewisham becomes a more desirable place to live and work. The recommended option imposes certain restrictions/conditions on developers, and this may have short term adverse effects on development and economic growth. Incorporation of sustainable design principles into historical assets may be difficult, and conflicts may therefore arise.
- 2.222** Alternative 1 would result in a similar approach as through the recommended option but is less detailed and prescriptive and is therefore unlikely to be as clear for developers and interested parties to follow in order to deliver the beneficial and adverse impacts detailed above. Alternative 2 would result in similar benefits, albeit at a smaller scale due to the lack of encouragement to improve the existing house. The requirements for new elements of development would be retained and therefore the negative impacts would remain the same as for the recommended option.

2.24 Air quality

What is the aim of this policy option?

- 2.223** The aim of this policy option is to ensure that the boroughs resident's and visitors are protected from air pollution which can pose a substantial risk to human health and well-being.

Council's recommended option 22

Air quality

1. The Council will require all major developments that have the potential to impact on air quality to submit an Air Quality Impact Assessment (AQIA) considering the potential impacts of pollution from individual and cumulative development on the site and on neighbouring areas and detailing any appropriate mitigation measures that would reduce exposure to acceptable levels.
2. Applications for planning permission for all new developments that have the potential to impact on air quality in an Air Quality Management Area (AQMA) will not be permitted to include a biomass boiler.

Justification

- 2.224** Recommended Option 22 implements Core Strategy Policy 7 (Climate change and adapting to the effects) and Policy 9 (Improving local air quality). These policies deliver the approach in London Plan policy 7.14 (Improving Air Quality) and are supported by the Mayor's Air Quality Strategy (2010) and the Lewisham Air Quality Action Plan (2008) in reducing air pollution from new developments and providing appropriate measures for areas where air quality is poor. The policy option is also consistent with the NPPF (paragraph 124), which states "planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of AQMAs and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in AQMAs is consistent with the local air quality action plan".
- 2.225** There are considerable health benefits related to the improvement of air quality through the reduction of air pollution in the borough. The Council's Air Quality Action Plan (AQAP) has identified that road traffic is the main source of air pollution in the borough, mostly in roads with a high flow of buses and/or HGVs, junctions and bus or coach stations. The pollutants of greatest concern in the borough are nitrogen dioxide and particles, although other pollutants such as carbon monoxide and sulphur dioxide can also impact on health at high concentrations. The Council will only grant planning permission for major developments that have considered air quality through an AQIA to ensure the development meets the Council's AQAP.
- 2.226** Lewisham adopted five AQMAs in 2001 that are located where the level of nitrogen dioxide (NO₂) and particulates (PM₁₀) levels are higher than the National Air Quality Objectives. A further AQMA will be created in 2012 around Honor Oak Park. All development proposals which may cause significant impact on air quality directly or indirectly within AQMAs will need to submit an AQIA to the Council. This needs to demonstrate how the proposal would likely impact on local air quality, whether it is appropriate to have the proposed use, and how it would avoid, reduce and mitigate local pollutant emissions. Where appropriate, planning

obligations will be sought to minimise harmful air quality impacts arising from development or offset any increase in local pollutant emissions through contributions towards the implementation of the Lewisham AQAP.

- 2.227** Air quality is a material consideration for development proposals that include the use of biomass boilers. Local evidence shows that the use of biomass boilers within or in the vicinity of AQMAs has had a negative impact on local air quality. They are therefore considered inappropriate in such areas and alternative options should be considered for the delivery of energy efficient power.

Alternative option/s 22

The reasonable alternative associated with this option could be:

1. Relying on London Plan Policy 7.14, London Plan Sustainable design and construction SPG (2006, and forthcoming draft in 2012), Core Strategy Policy 9 and Lewisham's Control of Pollution and Noise from Demolition and Construction Sites Code of Practice (2008) rather than a separate DM policy.

What does the sustainability appraisal say?

- 2.228** The sustainability appraisal showed the positive impacts of Option 21 by limiting development types which may exacerbate air pollution. Air quality improvement would bring long term benefits for the environment and human health and wellbeing. It would also make Lewisham a better place to live and work and bring long term indirect positive impacts on environmental and social benefits. Negative impacts have been identified for economic development as certain developments that could provide employment and encourage enterprise may not be feasible if they conflict with standards for the AQMA. The sustainability appraisal of the alternative shows that it will also have positive effects, albeit at a potentially lower level. As the recommended option is more prescriptive in imposing restrictions on development it will increase the positive environmental and community health and well being impacts, but may also have adverse effects on the economy.
- 2.229** DM Policy Option 22 and Alternative Option 22 (through the Core Strategy) promote the same goal - improving air quality within the borough and consequently will have similar positive effects for the environment, community health and wellbeing. However, Alternative 1 is less prescriptive than DM Policy Option 22 and therefore may have reduced negative effects on the economy, but will also have reduced positive impacts on the environment and human health and well being.
- 2.230** London Plan policy 7.14 has criteria to guide development to have low impact on air quality and address air pollution which would have positive effects on the local population and environment, health and well-being for the region. However the requirement for AQIA for development in Lewisham may lead to slight strengthening of these benefits on local air quality in the borough.

2.25 Openspace and biodiversity

What is the aim of this policy option?

2.231 The aim of this policy option is to conserve and enhance biodiversity and geodiversity assets in the borough to ensure it is safeguarded for future generations. Urban green space provides home for a diversity of flora and fauna and opportunities for city dwellers with direct access to nature. The presence of high quality and accessible open space and biodiversity in the borough provides environmental and economic benefits including cleaner air and water, more attractive landscapes, recreational areas and living environment.

Council's recommended option 23

Open space and biodiversity

1. The Council will require all new development to:
 - a. take full account of appropriate Lewisham and London Biodiversity Action Plans in development design and ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity and
 - b. use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Institute of Ecology and Environmental Management (IEEM). The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value.
2. New living roofs are required to be designed and fitted by a qualified and accredited installer and include an extensive substrate base, except where it can be demonstrated that such a base is not feasible and achievable. Developers are required to provide a Living Roofs Management and Maintenance Plan for the first 5 years to demonstrate the ecological impact of the living roof and how it will be monitored and maintained.
3. Artificial grass sport pitches are required to be delivered on hard surfaces and previously developed land rather than on existing natural grass, wherever feasible. Applicants should give consideration to the potential loss of open space, the effect on drainage and surface water flooding and the impact of the pitch, lighting and use on the amenity of the adjacent areas.

Justification

2.232 The Council recognises the importance in protecting and enhancing the connectivity of green infrastructure and richness of Lewisham's biodiversity through good landscape design, planning and management. This policy option implements Core Strategy Policy 11 (River and waterways network) (CSP11) and Policy 12 (Open space and environmental assets) (CSP12), which in turn support the approach in London Plan policies 5.11 (Green roofs and development site environs), 7.19 (Biodiversity and access to nature) and 7.20 (Geological conservation) and the NPPF (paragraph 117).

2.233 The provision of high quality and accessible open space is important to the human health of residents in Lewisham. The diverse and usable open space delivered through recommended option 23 will provide opportunities for physical exercise and a relaxing environment, promoting mental wellbeing through the reduction of stress and depression related health issues.

- 2.234** New development will be required to take full account of appropriate Lewisham and London Biodiversity Action Plans and subsequently include actions as part of the Code for Sustainable Homes and BREEAM standards as set out in the Core Strategy Policy 8 and DM Policy Option 21.
- 2.235** The policy option requires the use of up to date surveys that are completed by suitable professionals. Examples of sites in the borough that are designated as having biodiversity value include Sites of Importance for Nature Conservation, Metropolitan Open Land, Local Nature Reserves, the Blue Ribbon Network, the Waterlink Way and the South East London Green Chain Plus.
- 2.236** Where appropriate, information should be supplied on how development will avoid harming species and possible measures to enhance the provision of species or create new additional opportunities for that species. Where a new development is proposing the use of mitigation and/or compensation measures, detailed information to support the proposal will be needed. The Council has prepared the Planning Application Requirements (Local) for Biodiversity Conservation Survey and Report: 'The Lewisham Biodiversity Checklist' and the accompanying Guidance Notes (Oct 2010) which can be downloaded from the Council website. Further information can be found on the PAS website, including the document 'Planning to halt the loss of biodiversity' (2006) that provides recommendations and good practice for the integration of biodiversity conservation into land use and spatial planning in the UK.
- 2.237** The Council will encourage that all ecological surveys are submitted to Greenspace Information for Greater London (GiGL, www.gigl.org.uk) to assist in the collection of biodiversity information for both Lewisham and across Greater London.
- 2.238** The Council will seek to maximise the use of living roofs and walls, climbing plants, roof garden, terraces, balconies and courtyards in new development as they are feasible to increase the vegetation cover and outdoor space for biodiversity, amenity and community benefits in urban areas. CSP12 promotes the use of living roofs and the recommended option adds to the approach by detailing measures to ensure provision is of appropriate quality.
- 2.239** The living roofs assembly shall as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and shall be installed on a waterproof membrane on an applicable roof. The buildings should be designed to have sufficient structural capacity and integrity to resist all loads for soil, moistures, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer signed up to the Green Roof Organisation (GRO) principles. It should be demonstrated how the installation and maintenance will comply with the standards identified in the GRO Green Roof Code: Green Roof Code of Best Practice for the UK 2011, or any national equivalent.
- 2.240** A management and maintenance plan is required for all living roofs to include a species list and a plan for sustainable irrigation and replacement planting with a cross-section (1:20), demonstrate an appropriate substrate depth, and to ensure that within five years of the planting date the selected plants will cover no less than 80% of the vegetated roof. A contour plan will need to demonstrate how the plants and native species selected and the roof design would be beneficial to local biodiversity.
- 2.241** Artificial sports pitches can increase the potential for leisure uses in an area of open space, especially where multi-use surfaces are utilised. The Council will seek to ensure that such benefits are not outweighed by negative impacts on the open space and the surrounding

environment, including biodiversity, flooding and local amenity. The Council will support new provision where it is appropriate and required and refuse permission for poorly located facilities or those that are detrimental to the surrounding environment.

Alternative option/s 23

The reasonable alternatives associated with this option could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a more detailed local policy.

What does the sustainability appraisal say?

- 2.242** The sustainability appraisal of Recommended Option 23 showed positive impacts of the recommended option including the enhancement of biodiversity and that it will assist in mitigating and adapting to climate change and reducing resource use. Reducing resource use will be beneficial to economic development in the long term. Additionally, improved open space will positively effect community health and wellbeing and social cohesion in the long term. The negative impact of this policy option concerns the restrictions and conditions imposed upon developers, and hence the potential increase in development costs, which may lead to an adverse effect on the economy.
- 2.243** DM Recommended Option 23 provides greater detail for the protection and promotion of open spaces and biodiversity within Lewisham, than relying on the Alternative Option 23 (London Plan and Core Strategy) alone. Whilst the London Plan and Core Strategy will need to be addressed in all planning application, the further detail specific to the borough that DM Recommended Option 23 provides will allow for greater certainty for developers on implementation locally.

2.26 Landscaping and trees

What is the aim of this policy option?

2.244 The aim of this policy option is to ensure applicants consider landscaping and trees as an integral part of the application and development process. Good landscaping and the provision of trees have extensive benefits to humans and wildlife, create wildlife habitats and increase biodiversity, provide shelter from wind, sun and rain, and increase amenity by beautifying the natural landscape, townscape and public realm.

Council's recommended option 24

Landscaping and trees

1. Applicants for all major development and, where appropriate, non-major development will be required to submit a Landscape Scheme, proportionate to the size of the development, containing:
 - a. a Landscape Plan for areas not occupied by buildings that takes note of the relevant site features and indicates those that are to be retained, including trees and the presence of any species of nature conservation interest,
 - b. details of all enabling work required to ensure the implementation of the Landscape Plan,
 - c. an enforceable 5 year Landscape Management Plan detailing the provision, management and maintenance of quality hard and soft landscapes and trees.
2. Applicants for all major development and, where appropriate, non-major development (and always when there is a Tree Preservation Order in place) will be required to:
 - a. submit an Arboricultural Survey carried out by an appropriate, competent person, in line with BS5837
 - b. retain existing trees for the most part and in the event of tree removal, replacement planting will normally be required. New and replacement tree planting must use an appropriate species that reflects the existing biodiversity in the borough.

Justification

- 2.245** Recommended Option 24 implements Core Strategy Policy 12 (Open space and environmental assets), which supports the approach in London Plan policies 5.10 (Urban Greening) and Policy 7.21 (Trees and Woodlands). It is also consistent with the NPPF (paragraph 118) which requires the planning system to consider the approach to protecting trees and green landscapes.
- 2.246** The provision of high quality landscaping, along with trees, is important to the human health of residents in Lewisham. The accessible green space delivered through recommended option 24 will provide opportunities for physical exercise and a relaxing environment, promoting mental wellbeing through the reduction of stress and depression related health issues.

- 2.247** Landscape Schemes are required by the Council in order to ensure that good landscaping is planned into the design of the whole development and is also realistic, implementable and sustainable in the medium to long term. As a minimum, a Landscape Scheme should include a Landscape Plan, delivery information and a Landscape Management Plan.
- 2.248** A Landscape Plan is sought for areas that are not occupied by buildings to demonstrate how the relevant existing site features are to be retained, including trees, and the presence of any species of nature conservation interest. This will help to protect and conserve urban biodiversity by maintaining an environment with trees and vegetation. To ensure the delivery of high quality landscaping, it will need to be designed by an appropriate qualified person, complement the design of the development and comply with the design policies in this plan, the Core Strategy and the London Plan. The Council will encourage applicants to embrace the use of good landscaping to assist in meeting the standards set out by the Code for Sustainable Homes and BREEAM.
- 2.249** A Landscape Management Plan is vital in ensuring the long term sustainability of landscaping. It should ensure that where relevant it considers planting plans, proposed materials and species, details of building subsidence and other liabilities, drainage, underground services and infrastructure, security and access of the development.
- 2.250** The Council will fulfil its responsibility to protect trees and woodlands where they make an important contribution to public amenity by designating Tree Preservation Orders (TPO) to protect specific trees or particular areas, groups or woodland from deliberate damage and destruction. It is a criminal offence to prune, fell or damage protected trees without getting the consent from the Council, therefore applicants should ensure they safeguard all trees that are the subject of Tree Preservation Orders. The Council will enforce breaches of control and the offender is liable to substantial fines.
- 2.251** Major applications (and minor applications where appropriate) are required to retain existing trees in new development and protect trees during the construction of the development. Development schemes should not result in an unacceptable loss of trees, especially those that make a significant contribution to the character or appearance of an area, unless they are considered dangerous to the public by an approved Arboricultural Survey. Where trees are removed as part of new development, replacement planting will normally be required.
- 2.252** An Arboricultural Survey should include the following information:
- a. Details of the existing species, spread, roofs and position of trees
 - b. Details of which trees will be felled as part of the proposed development
 - c. Details of trees that will be affected by the proposed development (including those located on adjacent sites) and what measures will be taken to protect them during construction and
 - d. Plans and documents outlined in accordance with the British Standards 5837 (2012) including, a tree survey, a tree constraints plan, an Arboricultural Implications Assessment and an Arboricultural Method Statement including a Tree Protection Plan.
- 2.253** Further guidance is available through No Trees, No Future: Trees in the urban realm, Trees and Design Action Group, Forestry Commission (2008) which provides detailed technical and good practice guidance in integrating trees in new development. The Canopy - London's Urban Forest: A Guide for Designers, Planners and Developers, Trees and Design Action Group, (2011) also offers guidance to increase the number of new trees being planted and reverse the decline of existing mature trees.

Alternative option/s 24

The reasonable alternatives associated with this option could include:

1. Relying on London Plan Policy 5.21 and 7.21, Core Strategy Policy 8, the GLA's Green Infrastructure and Open Environments: Preparing Borough Tree and Woodland Strategies SPG (2012), the Mayor's Biodiversity Strategy – Connecting with Nature (2002), Lewisham Biodiversity Action Plan and Lewisham Tree Strategy rather than a separate Development Management policy.

What does the sustainability appraisal say?

- 2.254** The sustainability appraisal showed positive impacts of Recommended Option 24 including retention of trees, tree planting and enhancement of the Lewisham landscape. This would help to make Lewisham a more desirable place to live and have indirect long-term positive effects on human health and well-being and climate change adaptation. The negative impacts have been identified for the local economy and water. The policy presents restrictions and conditions for developers, and therefore may increase the cost of development leading to adverse effects on the local economy. Additional trees within Lewisham will require excess water which will increase use of this resource.
- 2.255** Relying on the strategies listed in Alternative Option 24 is likely to promote similar positive and negative effects as for DM Recommended Option 24. However, Alternative 1 relies on a large volume of other information and documents. This may make implementation of the alternative cumbersome as well as difficult to monitor for developers and the Council. It may also discourage developers and frustrate the promotion of enhanced landscapes and retention of trees within Lewisham.

2.27 Noise and vibration

What is the aim of this policy option?

2.256 The aim of this policy option is to reduce excessive noise or vibration which can be detrimental to human health and well-being and can impact negatively on natural habitats. The Council recognises the importance of protecting sensitive uses from excessive noise by locating both noise sensitive developments and noise generating developments in appropriate locations. There is also value in seeking opportunities to improve existing noise free or 'tranquil' areas in the borough.

Council's recommended option 25

Noise and vibration

1. The Council will require:
 - a. noise and/or vibration generating development or equipment to be located in the Strategic Industrial Locations and Local Employment Locations as shown on the Local Plan Policies Map,
 - b. new noise sensitive developments are to be located away from existing or planned sources of noise pollution, except if it can be demonstrated through design or mitigation that:
 - i. internal and external noise levels can be satisfactorily controlled and managed by the noise sensitive development; and
 - ii. there will be no adverse impact on the continued operation of any existing or proposed business or operation.
 - c. a Noise and Vibration Assessment for noise and/or vibration generating development or equipment and new noise sensitive development, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken.
2. The Council will designate, safeguard, protect and enhance tranquil open space by refusing planning permission for development that will affect a tranquil area, as identified in Table 2.1, by increasing the predicted traffic noise levels over 55 dB Leq (day), unless noise screening, barriers and natural sound features mitigate and offset the impact.

Justification

2.257 Recommended Option 25 implements Core Strategy Policy 12 (Open space and environmental assets), delivers the approach adopted in London Plan Policy 7.15 (Reducing Noise and Enhancing Soundscapes), supports the Mayor's Ambient Noise Strategy (2004), the Lewisham Open Space Strategy (2012) and Lewisham's Control of pollution and noise from demolition and construction sites code of practice (2008). The policy option is also consistent with the principles identified in the NPPF (paragraph 123) which encourages the identification and proper management of new and existing noise generating developments.

- 2.258** It is important for mental health and wellbeing of the people of Lewisham that noise is monitored and managed to the right levels in the right areas. The borough contains both noise generating uses and locations that are sensitive to noise and thus Recommended Option 25 is required to ensure the interaction between such areas is avoided if possible and mitigated if not.
- 2.259** Noise and vibration generating development is required to be located in the Strategic Industrial Locations (SILs) and Local Employment Locations (LELs) as defined in the Core Strategy and other Local Plans and shown on the Local Plan Policies Map. These locations, where ambient noise levels are already high, are considered appropriate for uses within the B Use Class (B1c, B8 and where appropriate B2 industry) and also suitable sui generis uses. Where developments are permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken to mitigate potential noise impacts.
- 2.260** New noise sensitive developments, including housing, hospitals, day centres and schools will not normally be allowed to locate near to existing or planned sources of noise pollution, especially where it would have a disproportionate effect on more vulnerable people such as the elderly or young children. Where no alternative location is available, appropriate mitigation measures of noise impacts in the design, internal layout, and treatment of the building façade would be required to achieve satisfactory internal and external living standards. Consideration should also be given to the provision of natural or mechanical ventilation where, for acoustic reasons, an alternative to opening windows is required.
- 2.261** A Noise and Vibration Assessment will be required where environmental noise is high or where a new development is likely to generate noise. This enables the Council to consider how the existing noise environment affects any proposed noise sensitive development and the potential impact that new noise generating development will have on the local area. The assessment should demonstrate compliance and make reference to relevant British Standards and World Health Organisation (WHO) guidelines and be undertaken by a qualified acoustician.
- 2.262** The EU Environmental Noise Directive 2002/49/EC (END) sets out how to reduce the impact of noise on citizens and was transposed into the Environmental Noise (England) (Amendment) Regulations 2009. It identifies the importance of open spaces in providing tranquil havens with positive soundscapes where people can interact with the natural acoustic environment, including natural sounds, animal vocalisation, weather, water and river flows.
- 2.263** The Council recognises the value of tranquil and quiet areas and seeks to designate, safeguard, protect and enhance them for the benefit the local community and biodiversity. The identified tranquil open spaces in Lewisham provide a pleasant natural landscape for people to relax, play and enjoy the tranquillity and help to generate a distinct sense of place, connecting people to the natural environment and providing unique aesthetic experiences. The rise in environmental and mechanical noises, including road and rail traffic and the increase in mechanical noise associated with new development can erode the tranquillity of open space. New development and change of uses near tranquil areas should be sensitive to this and not cause an increase in environmental noise.
- 2.264** Using the WHO guideline level for outdoor living areas of 55dB, the Lewisham Noise Mapping Study (2012) identified several tranquil open spaces in the borough. These are areas over one hectare in size and with 80% or more of the area having noise levels equal or below 55dB Leq (day) from traffic noise. The Council will protect and enhance positive soundscapes in identified tranquil open space. Any development that will affect the tranquil areas by increasing negative soundscapes above 55 dB Leq (day) will be refused, unless noise screening, barriers and natural sound features could mitigate and offset the impact. The

identified areas for protection are existing parks and gardens, semi-natural areas and a cemetery. The council will also seek to protect the tranquillity of all other open spaces in the borough from increased traffic noise by new development and changes to the highway networks.

Table 2.1 Tranquil open spaces in Lewisham

| Location | Ward |
|-----------------------|--------------|
| BeckenhamPlacePark | Bellingham |
| Durham Hill | Downham |
| MountsfieldPark | Rushey Green |
| Ladywell Fields | Rushey Green |
| Hilly Fields | Ladywell |
| Forster Memorial Park | Whitefoot |
| Chinbrook Meadows | Grove Park |
| Hither Green Cemetery | Hither Green |

Alternative option/s 25

The reasonable alternatives associated with this option could include:

1. Relying on London Plan Policy London Plan Policy 7.15 Reducing Noise and Enhancing Soundscapes, the Mayor's Ambient Noise Strategy (2004), Lewisham Open Space Strategy (2012), Lewisham Noise Mapping Study (2012), Lewisham's Control of pollution and noise from demolition and construction sites code of practice (2008) rather than a separate local policy.

What does the sustainability appraisal say?

- 2.265** The sustainability appraisal showed positive long term effects of the recommended option on Lewisham's local environment, not only for people and their health and well-being, but also for biodiversity such as birds and bats which favour low levels of disturbance. Reduced levels of noise and vibration will improve Lewisham's liveability which may have long term economic and employment benefits for the borough. The negative impacts identified concern the restrictions and conditions that would be implemented on applicants, and therefore may increase the cost of development leading to adverse effects on the local economy.
- 2.266** Assessment of Alternative Option 25 shows there is limited policy detail in the London Plan and Core Strategy with which to guide noise and vibration management and reduction within Lewisham. The Mayors Ambient noise strategy is relatively comprehensive although it is lacking in detail which is specifically relevant to Lewisham. Lewisham's Control of pollution and noise from Demolition and Construction document, whilst applicable and comprehensive, focuses solely on reducing noise arising from construction and does not address other sources of noise and vibration production within the borough.

2.267 Therefore, DM Recommended Option 25 is likely to provide increased certainty for developers in implementation within the borough compared to the alternative. Similarly for the alternative, the positive effects for the Lewisham community detailed for DM Recommended Option 25 are less likely to be realised. Alternative 1 also relies on a large volume of other information and documents. This may make implementation of the alternative cumbersome as well as difficult to monitor. It may also discourage developers and frustrate the promotion of enhanced landscapes and retention of trees within Lewisham.

2.28 Lighting

What is the aim of this policy option?

- 2.268** The aim of this policy option is to ensure high quality lighting design and installation in order to prevent the adverse impacts of light pollution, which can have a detrimental impact on biodiversity and wildlife, local character, residential amenity and views of the night sky.

Council's recommended option 26

Lighting

1. The Council will require applicants to protect local character, residential amenity and the wider public, biodiversity and wildlife from light pollution and nuisance, by:
 - a. taking appropriate measures in lighting design and installation in line with the Institute of Lighting Professionals' Guidance Notes for the Reduction of Obstructive Light (2011) to control the level of illumination, glare, spillage of light, angle and hours of operation,
 - b. using energy efficient and solar powered lighting for energy conservation where feasible,
 - c. providing sensitive lighting for footpaths, cycling paths and public parking areas in the development with particular consideration of the potential adverse impact on biodiversity,
 - d. preventing the adverse impact of light pollution at all stages of development, from building demolition and construction to occupation.

Justification

- 2.269** Recommended Option 26 supports the implementation of the Clean Neighbourhoods and Environment Act 2005 that makes light nuisance subject to the same criminal law as noise and odour and applies to 'artificial light emitted from premises so as to be prejudicial to health or a nuisance' (Section 102). Light pollution is artificial light that is allowed to illuminate, or intrude on, areas not intended to be lit, including light which is directed above the horizontal into the night sky. All forms of exterior light can bring light pollution and light nuisance if poorly designed and installed. New development may unavoidably change the natural and built environment by adding lights, such as security lights, floodlights and street-lights, which will all break into the darkness. Some security and street lights are necessary to maintain safe and functional streets, but excessive lighting is not necessary and can be avoided with good design and installation.
- 2.270** The policy option supports the implementation of the NPPF which aims to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (paragraph 125) as well as the London Plan policies 6.9 (Cycling), 6.10 (Walking), 7.3 (Designing Out Crime) and 7.5 (Public Realm).
- 2.271** Applicants are required to take appropriate measures to control the level of illumination, glare, spillage of light, angle and hours of operation. The Institution of Lighting Professionals (ILP) has produced Guidance Notes for the Reduction of Obstructive Light (2011) that provides design and installation guidance and recommendations in different environment zones and should be utilised by applicants. Where possible and feasible, energy efficient and solar powered lighting are encouraged to support the objectives of the Recommended Option 21 (Sustainable design and construction) and Core Strategy Policies 7 and 8.

- 2.272** Development will need to provide sensitive lighting for all footpaths, cycling and parking areas to contribute to a safer environment. However, applicants will need to ensure that appropriate consideration has been given to how safety requirements are balanced with the need to minimise the potential adverse effect of lighting on biodiversity, including bats, birds, habitats, invertebrates and water bodies. Lighting from new buildings will need to be designed and positioned in a way that minimises floodlighting. Where public areas need to be lit close to green and water spaces, careful positioning of light sources will be required, with the beam directed away from sensitive areas such as trees and rivers. The use of time or movement sensitive lighting is encouraged to support benefits to biodiversity and energy conservation.

Alternative option/s 26

The reasonable alternatives associated with this option could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a more detailed local policy.

What does the sustainability appraisal say?

- 2.273** The sustainability appraisal shows the positive impact of the recommended option as lighting which is sensitive to the needs of the community and biodiversity will have long term positive effects for the local environment as well as human health and well-being. Appropriate lighting is important to health and safety, to reduce the fear of crime and encourage social cohesion. Negative impacts have been identified for presenting restrictions and conditions for developers, and may increase the cost of development leading to adverse effects on the local economy. Additional lighting within the borough may also have an adverse effect on resource use due to the increased electricity usage. This will, however, depend on how the policy is implemented.
- 2.274** Assessment of Alternative Option 26 shows there is limited policy detail in the London Plan and Core Strategy with which to guide light management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage light pollution and sensitive lighting within the borough, which may impact on implementation. This would likely result in reduced beneficial impacts to those presented for DM Policy Option 26.

2.29 Contaminated land

What is the aim of this policy option?

2.275 This policy option aims to ensure that any land known or suspected of being contaminated, or where a sensitive use is proposed, is dealt with before the development commences. The re-use of previously developed land is commonplace in urban areas such as Lewisham and where this is so, land contamination can exist. Contamination occurs due to human activities, mainly industry, waste disposal, chemical and oil spills.

Council's recommended option 27

Contaminated land

1. The Council will require applicants to comply with the following step approach to minimise and mitigate any harmful effects to human health and the environment by requiring an appropriate level of Land Contamination Assessment. This is applicable wherever development is proposed on contaminated land, land suspected of being contaminated, or if a sensitive use is proposed to ensure contamination is properly addressed. Applicants are required to:
 - a. complete a Preliminary Risk Assessment, consisting of a desk top study and site walkover report that shows all previous and existing uses of the site and adjacent land, and which assesses what the potential contamination risks to identified receptors are,
 - b. undertake a Site Intrusive Investigation, where necessary, to provide sufficient information to characterise the site and provide for a detailed assessment of the risks to all receptors that may be affected, including those off site,
 - c. obtain a Remediation Strategy, where contamination exists, for the Council's approval to deal with the identified hazards to ecosystems, humans, property and controlled waters and subsequent management and monitoring arrangements,
 - d. submit a Verification Plan for any remediation works, completed by a suitably qualified person that would be fully implemented and verified before occupation of the site to ensure effective measures would be taken to treat, contain or control the contamination in order to protect:
 - i. the occupiers of development and neighbouring land uses,
 - ii. the structural integrity of new and existing buildings and
 - iii. any watercourse, water body or aquifer.
 - e. submit a Verification Report, before occupation of the site, demonstrating completion and validation of works set out in the approved Remediation Strategy and the effectiveness of the remediation, for approval in writing by the Council. The report shall include results of sampling and monitoring carried out in accordance with the approved Verification Plan to demonstrate that the site remediation criteria have been met.

Justification

- 2.276** Recommended Option 27 implements the planning requirements of the Environmental Protection Act 1990 and the Contaminated Land (England) Regulations 2000. It also supports the delivery of London Plan Policy 5.21 (Contaminated Land) and is consistent with the principles identified in the NPPF paragraph 109, which requires the planning system to deal with contaminated land.
- 2.277** Contaminated land is defined in section 78A(2) of the Environmental Protection Act, 1990 as any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that -
- a. significant harm is being caused or there is a significant possibility of such harm being caused, or;
 - b. pollution of controlled waters is being, or is likely to be, caused.
- 2.278** Regeneration of previously developed land is a key Government policy and is integral to regenerating inner cities and creating housing and jobs. This type of land can also represent important opportunities to provide wildlife habitat, public green space, or improve urban green networks.
- 2.279** Applicants are required to undertake a full site investigation, considering the possible risks to future users of the site and potential threats in soil, ground and surface water quality and the ecosystem. Appropriate remedial measures approved by the Council are required before development can commence. A Verification Plan and subsequent Report prepared by a suitably qualified person is required to confirm that remediation works have been fully implemented and verified before occupation of the site. Planning conditions and monitoring frameworks may be imposed on planning applications to reduce or remove the environmental impacts from proposals.
- 2.280** When contaminated land has the potential to affect watercourses or groundwater, the Environment Agency (EA) should be contacted, as under certain circumstances they become the responsible authority, as designated by the Environment Act 1990.

Alternative option/s 27

The reasonable alternatives associated with this option could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a more detailed local policy.

What does the sustainability appraisal say?

- 2.281** Sustainability appraisal of DM Recommended Option 27 showed positive impacts including community health and wellbeing, although the outcome and the benefits accrued from remediation are dependent on the subsequent land-use type after remediation. The provision of new open space will be of benefit to biodiversity, climate change adaptation, as well as human health and well-being. A negative impact of the policy option is that it places relatively tight controls on developers seeking to develop or own contaminated land. Remediation can result in a high cost and may constrain development in these locations, therefore contaminated land sites may be left undeveloped for an extended period of time.

- 2.282** Assessment of Alternative Option 27 shows there is limited policy detail in the London Plan and Core Strategy with which to guide contaminated land management and reduction within Lewisham. This may create confusion amongst both developers and those trying to manage contaminated land within the borough, which may impact on implementation. This would likely result in reduced beneficial impacts to those presented for DM Recommended Option 27.

2.30 Car parking

What is the aim of this policy option?

2.283 The aim of this policy option is to ensure the effective implementation of car limited development and other parking standards, to help minimise congestion and reduce vehicle emissions. Without careful consideration new development can have a detrimental impact upon local roads and air quality in the local neighbourhoods.

Council's recommended option 28

Car parking

1. The Council will require parking standards in accordance with Core Strategy Policy 14.
2. Car limited major development will only be considered where there is:
 - a. PTAL level 4 or higher, or where this can be achieved through investment in transport infrastructure and services,
 - b. no detrimental impact on the provision of on-street parking in the vicinity,
 - c. no negative impact on the safety and suitability of access and servicing,
 - d. protection of required publicly accessible or business use car parking,
 - e. inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site car parking provision,
 - f. an equitable split of parking provision between private and affordable residential development,
 - g. on-site accessible priority parking for disabled drivers.
3. Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street car parking.
4. Wheelchair accessible car parking is required to be provided in accordance with best practice standards.
5. All new developments will need to ensure that at least 20% of parking bays have an electric charging point installed. Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.
6. Applicants will be required to negotiate appropriate provision of parking for motorcycles.

Justification

2.284 Recommended Option 28 supports the implementation of Core Strategy Strategic Objective 9 and Core Strategy Policy 14 (CSP14), which states that 'a managed and restrained approach to car parking provision will be adopted to contribute to the objectives of traffic reduction'. The option also supports the NPPF (paragraph 39) and the London Plan Policy 6.13.

2.285 Where new development occurs close to areas where there are frequent public transport services, there is a desire to reduce the need for the car and encourage use of the public transport network available. This can help reduce air pollution and congestion and encourage physical exercise, through walking and cycling, which is beneficial to human health and wellbeing.

- 2.286** Recommended option 28 supports reducing the provision of on-site car parking where there are alternative methods of travel. The option contains criteria to ensure that those developments seeking to reduce on-site car parking do so without unfavourably impacting the site or its surrounds and contain supporting measures to mitigate against the reduced level of on-site car parking. The option also ensures that sites with reduced car parking retain provision for disabled drivers.
- 2.287** This policy should be read alongside Core Strategy Policy 14 to ensure all requirements for car parking are considered. In particular, Core Strategy Policy 14 promotes the potential use of Controlled Parking Zones (CPZs), which may be required to prevent parking demand being displaced from the development onto the surrounding streets.
- 2.288** As detailed in point 2.F of Option 28, the Council will seek an equitable split of parking provision between private and affordable residential development. An equitable split might not be simply based on the number of units that are affordable / private, but may be influenced by other factors such as car ownership by housing type.
- 2.289** Wheelchair accessible parking will need to be provided even if car limited development is supported. Wheelchair parking should be provided as set out in the council's Planning Obligations (S106) SPD and BS8300:2009, or other equivalent national standards. Developments are also required to provide adequate provision for mobility scooter storage and charging. Mobility scooters and charging points shall be located in an appropriate place within the development, such as a ground floor space next to the lifts.
- 2.290** In line with the London Plan Policy 6.13, recommended option 28 requires 1 in every 5 car parking spaces to include an installed electric charging point. In order to facilitate the delivery of a consistent London-wide network, new charging points are required to meet Source London criteria.
- 2.291** The recommended option is supported by four transport studies including a borough-wide study and specific area studies for the Lewisham and Catford town centres, and Deptford and New Cross.

Alternative option/s 28

An alternative associated with this option could be:

1. Allowing car limited development for those sites located within PTAL level 3 and higher.
2. Relying on the policies in the London Plan and Core Strategy

What does the sustainability appraisal say?

- 2.292** The sustainability appraisal of the DM Recommended Option 28 showed that the promotion of car limited development will have long term benefits for the environment, air quality and adaptation and avoidance of climate change. There are also likely to be direct benefits to health and wellbeing due to decreased air pollution and indirect benefits through creating a more pleasant environment in which to live and work. There is a small potential for conflict with the economy as provision of car limited development may discourage some users from using shopping centres etc.

- 2.293** Alternative Option 28.1 would allow more car limited development and would hence increase the amount of environmental benefit. However, these developments will not be as accessible when compared to PTAL 4 sites, and there may be adverse impacts for the local economy and increased deprivation as people find it more difficult to access these sites.
- 2.294** Alternative Option 28.2 (through Core Strategy Policy 14 and the London Plan policies) and DM Recommended Option 28 are both aimed at managing the sustainable transport in Lewisham, however DM Recommended Option 28 provides much more detail to guide the appropriate provision of car parking in the borough for developments. This provides much more certainty to developers and provides clear criteria for car limited development to achieve the beneficial impacts detailed above.

2.31 Urban design and local character

What is the aim of this policy option?

- 2.295** This policy option sets out the detailed principles to support the good urban design in the borough. High quality urban design is central to the Core Strategy vision for Lewisham 2026. Development that is well designed, safe, provides or promotes a sense of place and good access to facilities is a central to achieving sustainable development and in developing healthy communities.

Council's recommended option 29

Urban design and local character

General principles

1. The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met. This policy is supported by various Supplementary Planning Guidance Documents as referenced in the Core Strategy.
2. Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in the Lewisham Character Study.
3. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and the development of a sense of place. If necessary the value and significance as a heritage asset will be assessed as part of any development proposal.
4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.

Detailed design issues

5. Development applications will also be required to address the following detailed matters in the Design and Access Statement to demonstrate the required site-specific design response:
 - a. how the development will relate positively to the existing townscape, natural landscape, open spaces and topography to preserve and/or create an urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape, open space and views and vistas, taking all available opportunities for enhancement
 - b. height, scale and mass in relation to the surrounding built context
 - c. layout and access arrangements. Large areas of parking and servicing must be avoided.
 - d. how the scheme relates to the scale and alignment of the existing street including its building frontages
 - e. the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities and the public transport network, including meeting the needs of disabled and older people and people with young children.

Council's recommended option 29

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- f. the quality and durability of building materials and their sensitive use in relation to the context of the development. Materials used should be high quality and either match or complement existing development, and the reasons for the choice of materials should be clearly justified in relations to the existing built context
- g. details of degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials
- h. how the development at ground floor level will provide activity and visual interest for the public including to the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain
- i. new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8.

Justification

- 2.296** The Core Strategy requires new development in the borough to achieve a high standard of design. The policies in the Core Strategy set out a positive framework for achieving high quality and inclusive design for all development and are based on an understanding of the character of the borough and an evaluation of its characteristics.
- 2.297** The above policy sets out the detailed considerations and issues that need to be considered and addressed by development applications in order to achieve the high standards of development required. New development needs to respond to its context, local character and history and, while not preventing or discouraging innovative design, should promote or reinforce local distinctiveness. The NPPF requires new development to have a high design quality supports this approach (paragraph 11, Core planning principles and Section 7, Requiring good design).
- 2.298** The potential of sites for development needs also to be optimised. Table 2.2 sets out the urban typologies from the Lewisham Character Study, relates them to the densities set out for London Plan character areas and Public Transport Accessibility levels (PTAL) and summarises the specific problems and issues which development schemes will be required to address.
- 2.299** The assignment of a housing density to a particular site is a complex issue. Table 2.3 Sustainable Residential Quality, has been included from the London Plan for information purposes⁽²¹⁾. If this table is revised in future versions of the London Plan the council will use the up-dated version as appropriate. Housing densities need not be identical to that of the surrounding housing context in order to be successful and therefore the density ranges can be indicative only. Successful development will depend on thoughtful and innovative design in order to achieve an integrated result with the surrounding built context.

21 London Plan Policy 3.4 Optimising Housing Potential and Table 3.2 Sustainable residential quality

- 2.300 The London Plan has a suite of policies relating to place shaping and urban design. The following are relevant to this policy option and support its implementation: Policies 7.1 (Building London's Neighbourhoods and Communities), 7.2 (An inclusive environment), 7.3 (Designing out crime), 7.4 (Local character), 7.5 (Public realm), 7.6 (Architecture), 7.7 (Location and design of tall and large buildings) and 7.9 (Heritage-led regeneration). This list is not exclusive.
- 2.301 The Lewisham Core Strategy identifies four spatial policy areas (see Core Strategy Spatial Policies 2, 3, 4 and 5) which set out the general design aims for the regeneration of these areas and which provide a general framework for the type of development that will be appropriate in these areas of the borough.
- 2.302 The Tall Buildings Study identifies Strategic Site Allocations (see Core Strategy Strategic Site Allocations 2 to 6) and Lewisham and Catford Town Centres as places where subject to further examination and assessment tall buildings may be considered suitable. The Lewisham Character Study indicates that tall buildings may be suitable in these locations but that they should not be located where they may disrupt the flow of the topography of the borough.
- 2.303 In line with the principles of sustainable development building materials should be obtained from sustainable sources as locally as possible while recognising that in a heavily urbanised area there will always be transport costs associated with building materials to a site. The reuse/recycling of building materials will be encouraged where appropriate.
- 2.304 Living roofs and walls will be encouraged in all appropriate circumstances (see Core Strategy Policy 7 and the London Plan).

Table 2.2 Urban typologies in Lewisham

| Note: The assignment of a London Plan density to each character area is indicative only. The final assessment of the density of a residential area will be assessed on an individual basis as part of the development management process. | | | |
|--|---------------------|--|--|
| Lewisham Character Study typologies | London Plan density | Examples of the streets/areas within each urban typology | Lewisham Character Study identified issues |
| Housing - Perimeter Blocks | | | |
| Urban Terrace | Urban | Corbett Estate Catford (e.g. Braidwood Road, Killearn Road, Glenfarg Road); streets in the Hatcham Conservation Area at New Cross Gate; terraces to the west of the railway lines between Brockley | New development should not disrupt the regularity of the street form and the unity of the architecture. New separate dwellings in rear gardens in this urban typology will not be acceptable because of the disruption to its tight urban design form, usually with smaller sized gardens and in addition difficulty in achieving a good standard of amenity for neighbouring occupiers. Opportunities should be taken wherever possible to remedy alterations to the existing terraces which have weakened the coherence of this urban form by mixes of boundary treatments, loss of front gardens and the introduction of modern doors and windows. Some of these areas are designated as Conservation |

Note: The assignment of a London Plan density to each character area is indicative only. The final assessment of the density of a residential area will be assessed on an individual basis as part of the development management process.

| Lewisham Character Study typologies | London Plan density | Examples of the streets/areas within each urban typology | Lewisham Character Study identified issues |
|--|---------------------|--|--|
| | | and Honor Oak Park stations and east of Brockley Road | Areas and have been the subject of Conservation Area Appraisals where these matters are dealt with in more detail. |
| Suburban Terrace | Suburban | Estates at Bellingham and Downham, Milborough Crescent Further Green Road, South Park Crescent. | The major issues facing these areas are the sensitive management of change, the consistency of building facades where relevant and the maintenance of scale of development. New separate residential dwellings in the rear gardens of this urban typology will not be considered acceptable due to the difficulty of achieving a good design fit with neighbouring developments and disruption to the urban form which consists largely of short terraces. |
| Suburban Housing Suburban housing - issues | Suburban | Tewkesbury Avenue, Westwood Park, Liphook Crescent, Forest Hill; Crantock Road, and Newquay Road, Catford; Exford Road and JevingtonWay, Grove Park. | While building design and configurations vary there is often a relatively consistent approach to the styles and fashion of the period which establishes a reasonably cohesive feel, and building line. Buildings are most likely to be two storeys although three storey examples can be found. New development in these areas should respond to this context. Development of new separate dwellings in the rear gardens of this urban typology will not generally be acceptable due to the difficulty of maintaining the established character of these areas as identified in the Lewisham Character Study. |
| Villa | Suburban | Streets in Lee Manor Conservation Area, large areas of residential development in Blackheath, Brockley, Forest Hill and Telegraph Hill Conservation Areas. | These areas have the lowest density of the Perimeter block type. These buildings are generally set within a plot with a clear break between buildings. Buildings are generally larger than later suburban housing, both in size and in the proportion of the buildings with more generous floor to ceiling heights. Modern development has had a significant impact on villa types in terms of the conversion of dwellings, and replacement by modern blocks of flats which although usually maintaining the layout and spacing |

Note: The assignment of a London Plan density to each character area is indicative only. The final assessment of the density of a residential area will be assessed on an individual basis as part of the development management process.

| Lewisham Character Study typologies | London Plan density | Examples of the streets/areas within each urban typology | Lewisham Character Study identified issues |
|-------------------------------------|---------------------|---|---|
| | | | <p>characteristic of this typology do not maintain the spacious proportions of the buildings themselves. New development would need to address</p> <p>New separate residential developments in the side of rear gardens of this urban typology will not generally be acceptable in order maintain the characteristic residential quality of this urban typology.</p> |
| Housing - Complex Blocks | | | |
| Urban Complex Block | Urban | Armoury Road Lewisham; Pincott Place Crofton Park; Southerngate Way, Myers Lane, John Williams Close, New Cross | <p>These areas feature a mix of flats and houses and tend to follow the traditional street grid system. The streets are however designed to accommodate sufficient parking for all residents which enlarges the amount of street space with hard standing and with larger frontage to frontage distances than older areas. Internal parking courts and mews tend to break up the clarity of public and private space.</p> <p>New development should not seek to replicate this layout but should aim to re- introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.</p> |
| Suburban Complex Block | Suburban | Pennington Way, Edward Tyler Road Grove Park; Foxborough Gardens, Rushey Mead, Dressington Avenue, Ladywell | <p>These represent the trend for cul-de-sacs in later twentieth century development. They feature low densities of housing and have generally poor permeability and legibility.</p> <p>New development should not seek to replicate this layout but should aim to re- introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.</p> |

Note: The assignment of a London Plan density to each character area is indicative only. The final assessment of the density of a residential area will be assessed on an individual basis as part of the development management process.

| Lewisham Character Study typologies | London Plan density | Examples of the streets/areas within each urban typology | Lewisham Character Study identified issues |
|-------------------------------------|--|---|---|
| Housing - Free Form | | | |
| Towers and Slabs | Central Urban or Suburban dependent on context | <p>Towers - Examples: Lewisham Park; Tower Blocks on Pepys Estate</p> <p>Slab Bocks - Examples: Lovelinch Close, Sharrat Street, Winslade Estate; St Norbert Road; Pepys Estate; Wood Vale Estate</p> | <p>The Lewisham Character Study identifies these areas as failing to establish a clear structure of routes and private spaces, and lacking a sense of ownership and surveillance necessary for a safe street through the lack of a clear definition of public and private areas.</p> <p>A replication of this style of development will not be considered appropriate in future development schemes. Any replacement development would need to meet the design aims and policies for new development in the Core Strategy and Development Management Local Plan and aim to re-introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.</p> |
| Houses (Free Form low rise) | Urban or Suburban | Aldersgrove and Lambcroft Avenue, Grove Park; Ewart Road and Dalmain Road, Forest Hill; Wild Goose Drive and Dennet's Road New Cross | Similar comments to the above apply in relation to consider improving the urban fabric of these area. |

Table 2.3 Sustainable Residential Quality Matrix from the London Plan

Note: This table is provided for ease of reference. The Council will consider using up-dated versions of this table in future revisions of the London Plan.

| Setting | Public Transport Accessibility Level (PTAL) | | |
|-------------------|---|------------------------|-------------------------|
| | 0 to 1 | 2 to 3 | 4 to 6 |
| Suburban | 150 - 200 hr/ha | 150 - 250 hr/ha | 200 - 350 hr/ha |
| 3.8 - 4.6 hr/unit | 35 - 55 u/ha | 35 - 65 u/ha | 45 - 90 u/ha |
| 3.1 - 3.7 hr/unit | 40 - 65 u/ha | 40 - 80 u/ha | 55 - 115 u/ha |
| 2.7 - 3.0 hr/unit | 50 - 75 u/ha | 50 - 95 u/ha | 70 - 130 u/ha |
| Urban | 150 - 250 hr/ha | 200 - 450 hr/ha | 200 - 700 hr/ha |
| 3.8 - 4.6 hr/unit | 35 - 65 u/ha | 45 - 120 u/ha | 45 - 185 u/ha |
| 3.1 - 3.7 hr/unit | 40 - 80 u/ha | 55 - 145 u/ha | 55 - 125 u/ha |
| 2.7 - 3.0 hr/unit | 50 - 95 u/ha | 70 - 170 u/ha | 70 - 260 u/ha |
| Central | 150 - 300 hr/ha | 300 - 650 hr/ha | 650 - 1100 hr/ha |
| 3.8 - 4.6 hr/unit | 35 - 80 u/ha | 65 - 170 u/ha | 140 - 290 u/ha |
| 3.1 - 3.7 hr/unit | 40 - 100 u/ha | 80 - 210 u/ha | 175 - 355 u/ha |
| 2.7 - 3.0 hr/unit | 50 - 110 u/ha | 100 - 240 u/ha | 215 - 405 u/ha |

Alternative option/s 29

The alternative associated with this option are:

1. Provide a simple criteria based policy as in point 5 (and sub clauses (a) - (i) of the above Option, and provide area based guides or (Supplementary Planning Documents or Neighbourhood Plans produced by Neighbourhood Fora) to guide development.

This option would not necessarily conflict with the above option as the area based material would be transferred into Neighbourhood Plans and/or Supplementary Planning Documents

What does the sustainability appraisal say?

2.305 The sustainability appraisal showed that the recommended option would provide beneficial impacts on population, human health, water, air, climatic factors, material assets, biodiversity and landscape. The policy option promotes the incorporation of sustainable design principles and consideration of local character into building and townscape design. The policy option is broadly positive over a range of objectives as it promotes climate change and flood risk adaptation and management, biodiversity enhancements, protection of historical assets and

character, and social cohesion and health equality. The policy option would be likely to have positive economic benefits for Lewisham in the long term, as the borough becomes a more attractive place to live and work.

- 2.306** Potential adverse impacts on population and waste issues were recorded. The sustainability appraisal considered that the policy would impose various restrictions on development which may have a short term adverse impact on the local economy if restrictions are too stringent. The policy option will also drive future development which is likely to result in construction waste. It will be important to consider where the materials for development will be sourced. Materials should be sustainable and sourced locally wherever possible. The Council has included a reference to the desirability of obtaining construction materials locally, in the justification to the policy in response to the comment in the sustainability appraisal.

2.32 Alterations and extensions to existing buildings including residential extensions

What is the aim of this policy option?

2.307 This policy option sets out how to achieve good quality and well designed alterations and extensions to buildings. This is important in maintaining the quality of the street scene and the residential environment.

Council's recommended option 30

Alterations and extensions to existing buildings including residential extensions

1. Development proposals for alterations and extensions, including roof extensions will be required to be of a high site specific, sensitive design quality and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, porches etc, and use high quality matching or complementary materials appropriately and sensitively in relation to the context. New rooms provided by extensions to residential buildings will be required to meet the space standards in Option 31 Housing Design, layout and space standards.
2. In addition, where it is necessary:
 - a. side extensions should normally be set back and down from the main building line to allow for a clear break between existing buildings and the new work to maintain architectural subordination to the original building.
 - b. Rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope. Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building.
 - c. Residential extensions, roof terraces and balconies and non-residential extensions adjacent to dwellings should result in no significant loss of privacy and amenity (including sunlight and daylight) to adjoining houses and their back gardens. Residential extensions should retain an accessible and usable private garden that is appropriate in size in relation to the the size of the property, and retain 50% of the garden area.
 - d. additional or enlarged windows, doors etc. should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged.
 - e. Details of plant, pipework, fire escapes, lifts and other mechanical equipment including ducts and flues should be included within the initial planning application and be enclosed within the envelope of the building or, where that is impracticable, sited where they will have the least visual impact.
 - f. The council will consider proposals for building extensions that are innovative and have exceptional design quality where these are fully justified in the design and access statement.
3. Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area.
4. Where the roofline or party walls of buildings or terraces are exposed to long views from public spaces, a roof extension in any form that would have an obtrusive impact on that view will not be permitted.

Justification

- 2.308** Alterations and extensions to buildings are often necessary to modernise, adapt, enlarge or extend the life of a building and therefore contribute to sustainable development. If unsympathetically done they may harm the appearance of buildings individually or collectively, and cumulatively be detrimental to the townscape of the borough and the quality of the borough's residential environment.
- 2.309** The Lewisham Character Study identifies features of the street scene and the layout of development which should be preserved. This policy option provides a framework for controlling extensions to buildings so that they harmonise or complement character areas where they require planning permission.
- 2.310** Extensions and alterations to buildings should not significantly harm existing residential amenity in line with Core Strategy Spatial Policy 5 and Core Strategy Policy 15.
- 2.311** The Council considers it therefore appropriate to include design requirements in this policy which respects the guidance in the NPPF in relation to provision of high quality design, the creation of attractive streetscapes and buildings, and responds to local character appropriately (paragraph 11, Core planning principles and Section 7, Requiring good design).
- 2.312** This emphasis of this policy option is on the detailed design of new building extensions. Relevant London Plan policies which support the policy option include Policy 7.4 (Local character) and 7.6 (Architecture). The policy option is also supported by London Plan Policy 3.5 (Quality and design of housing developments) which requires new development to have minimum space standards.

Alternative option/s 30

The alternatives associated with this option are :

1. Include a greater detail of design advice in a supplementary planning document and rely on the general design aims elsewhere in the Plan to control extensions and alterations to buildings.
2. Include a greater level of detail within the DM Local Plan removing any potential need for a supplementary planning document

What does the sustainability appraisal say?

- 2.313** The sustainability appraisal showed beneficial impacts on cultural heritage/townscape and material assets. The policy option is likely to have positive effects on the look and character of the townscape, and protect cultural heritage assets. The sustainability appraisal showed adverse impacts on population, human health, air, waste, climatic factors. The policy option places certain conditions on development which may adversely affect the local economy in the short term and requires the use of certain types of materials which may be difficult to source locally thereby requiring long distant transport which could have a negative effect on climate change mitigation.
- 2.314** Alternatives 1 and 2 are likely to be very similar to those described for the recommended option above, with benefits for the townscape and historical assets but with greater detail which may be better tailored to local requirements. A possible short-coming of Alternative 1 is the fact that limited policy detail will be available until the SPD is published. The applicable

Core Strategy Policy (Policy 15) is not directly applicable to the aims of DM Option 30, and is therefore likely that reliance on the Core Strategy will be less successful at achieving the development aims currently set out in DM Option 30.

2.33 Housing design, layout and space standards

What is the aim of this policy option?

- 2.315** This policy option sets how to achieve high quality design and internal layout of new development. This is necessary to ensure the long term sustainability of new housing development by meeting the present and future needs of the occupants.

Council's recommended option 31

Housing design, layout and space standards

Siting and layout of development

1. The siting and layout of new build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.
2. New build housing development will be required to be:
 - a. sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment. Table 2.3 Sustainable Residential Quality Matrix will be used to aid assessment of the appropriate density of development in relation to public transport accessibility and character areas
 - b. provided with a readily accessible, secure, private and usable external space and include space suitable for children's play
 - c. designed so that that schemes in mixed tenure do not distinguish between public and private housing provision either in terms of quality of materials and design, or in level of amenities
 - d. designed to be safe and secure and reduce crime and the fear of crime.
3. The South East London Housing Partnership Wheelchair Homes Design Guidelines (or as subsequently amended) will be used to assess whether new build housing schemes meet Lifetime Homes and Wheelchair Housing Standards both in terms of internal layout and the external design features needed to ensure houses are accessible to their users.

Internal standards

4. The standards in the London Plan and the London Plan Housing Supplementary Planning Guidance will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals provide accommodation that meet the following criteria:
 - a. meet the minimum space standards for new development which should conform with the standards in the London Plan and the London Plan Supplementary Planning Guidance on Housing (as updated).
 - b. habitable rooms and kitchens and bathrooms are required to have a minimum floor height of 2.5 m. between finished floor level and finished ceiling level. Space that does not meet this standard will not count towards meeting the internal floor area standards.

Council's recommended option 31

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- c. provide accommodation of a good size, a good outlook, with acceptable shape and layout of rooms, with main habitable rooms receiving direct sunlight and daylight. Residential units provided should normally be dual aspect. Any single aspect dwellings provided will require a detailed justification as to why a dual aspect dwelling is not possible and a detailed demonstration that adequate lighting and ventilation can be achieved. North facing single aspect flats will not be supported.
- d. family housing (dwellings with three or more bedrooms) should be designed to have the potential to separate dining and living accommodation from the kitchen area in order to ensure privacy for the occupants.
- e. Studio flats (one person dwellings at GIA 37 sq. m.) will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations in the major and district town centres.
- f. include sufficient space for storage and utility purposes in addition to the minimum space standards.

Table 2.4 Minimum space standards for new housing development including conversions⁽²²⁾

| Dwelling Type | Bedroom (b) / persons - bedspaces (p) | GIA (sq m) |
|---------------|---------------------------------------|------------|
| Flats | 1p | 37 |
| | 1b2p | 50 |
| | 2b3p | 61 |
| | 2b4p | 70 |
| | 3b4p | 74 |
| | 3b5p | 86 |
| | 3b6p | 95 |
| | 4b5p | 90 |
| | 4b6p | 99 |
| | 2 storey houses | 2b4p |
| 3b4p | | 87 |
| 3b5p | | 96 |
| 4b5p | | 100 |
| 4b6p | | 107 |

22 All new residential developments and conversions are required to meet or exceed the standards or as updated and amended by future alterations of the London Plan

| Dwelling Type | Bedroom (b) / persons - bedspaces (p) | GIA (sq m) |
|-----------------|---------------------------------------|------------|
| 3 storey houses | 3b5p | 102 |
| | 4b5p | 106 |
| | 4b6p | 113 |

Justification

- 2.316** The standards and criteria in this policy option, including those taken from the London Plan and the London Plan Housing Supplementary Guidance, will ensure a reasonable level of residential amenity and quality of life, and that there is sufficient space, privacy and storage facilities in development to ensure the long term sustainability and usability of the homes. Table 2.4 Minimum space standards for new conversions, include the current London Plan standards and have been quoted for information purposes and convenient reference. Should these standards change in future versions of the London Plan then the new standards will be used.
- 2.317** High density new development in the form of purpose built flats proposed in the Core Strategy means that in order to be liveable, a reasonable amount of usable external space needs to be provided. This may mean that amenity space is provided in the form of balconies and roof terraces rather than in the form of gardens. Balconies and terraces should be large enough to be usable as an amenity space and should have a minimum width of 1500mm. Roof terraces and gardens should be designed with the security of the users in mind and also achieve a sense of enclosure. This form of external space may give rise to problems of privacy and overlooking in traditional street layouts and are more suited to dense urban areas what a premium and balconies and terraces are a more typical form of development. Family houses should be provided with their own private garden area of a size appropriate the the design and configuration of the housing site, the size of the houses and their intended occupancy. The Council will apply the standards of the London Plan Supplementary Planning Guidance, 'Providing for Children and Young People's Play and Informal Recreation', which specifies 10 square metres of playspace for each child.
- 2.318** Flexible and adaptable housing design reduces the need to move from home to home and allows for the sustainable development of communities. Larger room sizes can be used more flexibly as they are generally more adaptable. The South East London Housing Partnership Wheelchair Homes Design Guidelines comply with (and generally exceed) Part M of the Building Regulations, British Standard 8300, Lifetime Homes, the Housing Corporation 'Design and Quality Standards/Stephen Thorpe's 'Wheelchair Housing Design Guide' and the Mayor of London's Wheelchair Accessible Housing Guide. The adoption of the space standards for housing in this policy has been tested and adopted by the London Plan. Small studio flats intended for single person occupation are not considered to provide long term, sustainable solutions to housing need. In the exception cases when they are provided they will need to be in places that are not isolated and provide very good access to public transport and other amenities.
- 2.319** The minimum floor heights set out in clause (b) of the policy option are a guideline. Dependent on the format and aspect of the room this standard may need to be achieved in order to achieve adequate amenity and daylighting. Additionally there is a requirement in Option 32 (Infill, backland, back garden and amenity areas development) to replicate the ceiling and floor heights of adjacent development.

- 2.320** Core Strategy Policy 15 (CSP15) sets out the over-arching principles for new development that will apply to new development of whatever type in Lewisham. This policy option provides more detail as to how CSP15 will be implemented.

Alternative option/s 31

The alternative associated with this option are:

1. The Council could producing a Supplementary Planning Document (SPD) on housing design and standards.

What does the sustainability appraisal say?

- 2.321** The sustainability appraisal showed beneficial impacts on population, human health, climatic factors material assets, landscape. A number of direct, long term benefits for protecting and enhancing the townscape and in promoting equality in human health, social cohesion and reducing crime and the fear of crime were identified. The policy option is also likely to have indirect positive benefits on resource use and climate change by placing housing development close to public transport and ensuring its designed in an environmentally sustainable way. Adverse impacts were identified for population. Siting housing in accessible areas may have adverse effects for the local economy due to the potential for competition with other land uses.
- 2.322** The benefits and adverse effects for Alternative 1 are likely to be very similar to those described for DM Option 31, above, but would offer greater detail which may be better tailored to local requirements. A possible short-coming could be that delays in publishing an SPD would lead to a lack of interim guidance and consequent adverse effects on housing design. The application of CSP15 is not completely appropriate for the aims of DM Option 31, and it is therefore likely that reliance on the Core Strategy will be less successful at achieving the development aims currently set out in DM Option 31.

2.34 Infill, backland, back garden and garden amenity area development

What is the aim of this policy option?

2.323 This policy option sets out the requirements for a variety of sites within residential areas that may come forward for development. Development on these sites require careful consideration due to the need to preserve the quality and amenity of residential areas. The main types of sites are listed below:

- A. Infill sites are defined as sites within street frontages such as former builders yards, small workshops and garages, gaps in terraces and gardens to the side of houses. Infill sites may present urban design problems in harmonising the development with the existing built form.
- B. Backland sites are defined as 'landlocked' sites to the rear of street frontages not historically in garden use such as builders yards, small workshops and warehouses, and garages. They require sensitive treatment and a high quality of design in order to achieve successful development because of the potential for visual and functional intrusion due to the close proximity to existing housing.
- C. Back gardens are private amenity areas that were the entire back garden of a dwelling or dwellings as originally designed. Gardens used to be considered previously developed land (PDL) with a presumption in favour of development. Gardens are no longer considered to be PDL which means that there is no longer a presumption in favour of development. Back gardens in the 'perimeter block' urban typologies identified in the Lewisham Character Study which have more or less enclosed rear gardens, are considered to be an integral part of the original design of these areas and provide valuable amenity space and an ecological resource. Development of separate dwellings in the back gardens of these urban typologies will not be considered acceptable.⁽²³⁾ Other typologies also often have dwellings with private back gardens that do not form such as strong design feature of the development. These are typically more modern developments which feature small gardens which are rarely longer than 10 metres or are quite narrow.⁽²⁴⁾
- D. Amenity areas are communal amenity areas attached to residential development. Examples of these are:
 - private communal gardens for small blocks of flats
 - landscaped spaces around taller blocks of flats⁽²⁵⁾ and around low and medium rise 'slab blocks'⁽²⁶⁾ where typically the distinction between the public and private realms is ambiguous and which provide a generally less secure environment as a result.

2.324 These definitions will cover the majority of sites of this type that are likely to come forward for development. It is recognised however, that there will be some instances where a particular site will not fall squarely within any one of these definitions. In these cases the principles that will be applied will be taken from the appropriate parts of this policy.

23 The Lewisham Character Study names these urban typologies as: Urban Terrace; Suburban Terrace; Suburban; Villa.

24 Complex-urban, complex-suburban, free form-houses typologies in the Lewisham Character Study

25 Free form-towers urban typology in the Lewisham character Study

26 Free form-slabs in the Lewisham Character Study

Council's recommended option 32

Development on Infill Sites, Backland Sites, Back Gardens and Amenity Areas

General principles

1. Depending on the character of the area and the urban design function a space fulfils in the streetscape, some sites will not be considered suitable for development and planning permission will not be granted.
2. If a site is considered suitable for development planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape. This includes the importance of spaces between buildings which may be as important as the character of the buildings themselves, and the size and proportions of adjacent buildings.
3. Development on these sites must meet the policy requirements of DM Option 29 (Urban design and local character), DM Option 31 (Housing design and space standards) and DM Option 24 (Landscaping and trees).
4. Development on these sites should retain existing formal or informal pedestrian through routes.

A. Infill sites

5. Development within street frontages and on street corners will only be permitted where they:
 - a. make a high quality positive contribution to an area
 - b. provide a site specific creative response to the character and issues of the street frontage typology identified in the Lewisham Character Study, and any relevant Conservation Area Appraisal
 - c. result in no significant overshadowing or overlooking, and no loss of security to adjacent houses and gardens
 - d. provide appropriate amenity space in line with DM Option 31 (Housing Design, Layout and Space Standards)
 - e. retain appropriate garden space for adjacent dwellings
 - f. repair the street frontage and provide additional natural surveillance
 - g. provide adequate privacy for the new development and
 - h. respect the character, proportions and spacing of existing houses.

B. Backland sites

6. New development on sites of this type will only be permitted where they provide:
 - a. a proper means of access and servicing which is convenient and safe both for drivers and pedestrians
 - b. no significant loss of privacy, amenity, and no loss of security for adjoining houses and rear gardens and

- c. the provision of appropriate amenity space in line with the policy requirements in DM Option 31 (Housing Design, layout and space standards).

7. Gated developments on these sites that prevent access which would normally be provided by a publicly accessible street will not be supported.

C. Back gardens

8. The development of back gardens for separate dwellings in perimeter form residential typologies identified in the Lewisham Character Study will not be granted planning permission.

D. Amenity areas

9. Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:
 - a. repair or re-provide active street frontages
 - b. increase natural surveillance
 - c. retain existing private rear gardens where they are provided
 - d. retain adequate amenity space for the existing development according to the requirements of DM Option 31 (Housing design, layout and space standards)
 - e. provide no significant loss of privacy and amenity, and no loss of security for adjoining residential development and private back gardens and
 - f. provide adequate privacy for the new development.

Justification

- 2.325** Infill and backland development needs sensitive design in order to not detract from the character of the street scene, the architectural integrity and scale of adjacent buildings or from residential amenity. The NPPF requires all new development to achieve high quality design. Development on mid-terrace sites will require particular attention to be paid as to how it will relate successfully and complement the character of the street.
- 2.326** Good access to development on backland sites is a key issue and will be an important factor when considering development applications. Emergency vehicles, refuse vehicles and delivery services need appropriate access. Pedestrian access needs to be safe for all users and avoid conflict with vehicles. If safe and convenient access cannot be achieved for all users then developments may be refused.
- 2.327** New development on these sites should ensure that existing pedestrian connections, whether formal or informal, with the rest of the neighbourhood are retained in order to ensure permeability and the integration of the new development. Gated sites are considered to be less secure due to the reduction of natural surveillance available to the site, and harms the integration, permeability and cohesiveness of neighbourhoods. New developments on these sites should also result in no loss of security to adjacent dwellings.
- 2.328** Garden land is no longer considered to be previously developed land. The Lewisham Character Study identifies various urban typologies where the built form relies on more or less regular street forms, building facades, and garden areas where developments on back gardens are likely to have a negative impact on the design integrity of the street scene.

- 2.329** NPPF (paragraph 53) supports the setting out of policies to resist inappropriate development of residential gardens which would cause harm to the local area. The London Plan also supports a presumption against development on back gardens or other private residential gardens where this can be locally justified (Policy 3.5, Quality and design of housing developments). The Lewisham Character Study provides this justification by identifying the essential contribution that rear gardens make to the character and quality of perimeter style developments.
- 2.330** The policy option requires that sufficient garden amenity areas in these new developments to be provided in line with DM Policy Option 31. This policy option requires all new development to 'be provided with a readily accessible, secure, private and usable external space and include space suitable for children's play.' In the case of development on these sites this requirement will mean that garden space must not be provided in a piecemeal fashion on a series of small garden areas, but as a useable space suitable for the intended occupants, including where appropriate, for children's play.
- 2.331** Back gardens in perimeter style residential developments are considered to be an important amenity resource and make an essential contribution to the character and quality of the residential areas identified in the policy. They provide high quality amenity space for occupiers of the houses in perimeter style developments and a very significant ecological resource. The report 'London Garden City' (2010) prepared by the London Wildlife Trust examines the changing anatomy of London's private gardens, and the scale of their loss. The report estimates that between April 2005 and March 2008 that the amount of garden green space decreased significantly. New gardens in developments were small resulting in a loss of garden cover and biodiversity value and so the cumulative effect was a loss of biodiversity. For these reasons the policy seeks to prevent development in the rear gardens of these listed typologies. This is in line with Core Strategy Spatial Policy 5 (Areas of Stability and Managed Change) and Core Strategy Policy 15 (High quality design for Lewisham) ensures that new development in residential areas will protect their existing character and residential quality.
- 2.332** Many urban typologies identified in the Lewisham Character Study do not have the regularly arranged character of the perimeter style developments as they are more fragmented (e.g. Slab blocks, free form towers and houses with less well defined open amenity areas and/or have small gardens which would not lend themselves to development (e.g. complex urban and suburban typologies). The Lewisham Character Study identifies the issues relating to these urban typologies and these are addressed in DM Option 29. Any development in these areas would need to address the requirements identified in DM Option 32, retain sufficient amenity space and provide appropriate access. Development in amenity areas in these urban typologies should aim to re-provide and/or repair a perimeter form of urban typology. However, the Council also considers it vital to preserve the amenity of houses with small rear gardens in modern developments by retaining these gardens in any development proposals.

Alternative option/s 32

The reasonable alternatives associated with this option could include:

1. Reliance could be placed on DM Option 29 which sets out the general parameters of development in the borough without having a specific policy for this issue which would cover infill development and development on backland sites.
2. A permissive attitude to development on rear gardens in perimeter style developments could be taken in order to increase housing numbers.

What does the sustainability appraisal say?

- 2.333** The sustainability appraisal showed beneficial impacts for population, biodiversity, soil, water, air, climatic factors, landscape. The policy option guides development of infill and back-land areas in a manner which will not adversely impact the townscape and character of an area, reduce the amenity, or result in a reduction in wildlife habitat. The policy option also stipulates that this development type must not exacerbate parking or congestion problems within a given area. It is therefore likely to have benefits for the environment, as well as long term indirect benefits for the local economy.
- 2.334** Alternative 1 is likely to have similar positive and negative environmental, social, and economic effects when compared to DM Option 32, as are detailed above. The recommended option is however likely to provide clearer and more effective guidance.

2.35 Thames Policy Area

What is the aim of this policy option?

- 2.335** The policy option sets out the development management issues that relate to the special character and quality of the River Thames which is a strategically important feature of London, and to the special character of Deptford Creekside which forms part of the Blue Ribbon.

Council's recommended option 33

Thames Policy Area and Deptford Creekside

1. New development within the Thames Policy Area or on sites adjacent to Deptford Creek will need to, where appropriate, improve the relationship of the River Thames or Deptford Creek with the local context, by:
 - a. maintaining and improving the relationships of local views, existing visual links and physical connections, landmarks, recreational facilities, listed buildings and the archaeological heritage with the river or creek
 - b. providing a mixture of uses on sites to be developed adjacent to the river or creek
 - c. addressing the river or creek as an important part of the public realm, and contribute to the liveliness of the waterfront by providing a mixture of uses including where appropriate the inclusion of public uses on the ground floor of buildings along the Thames Path
 - d. encouraging river-related and marine uses where appropriate in line with other policies in the Plan
 - e. maintaining and where appropriate enhancing the appearance and nature conservation interest of the river or creek corridor including the river or creek walls and foreshore
 - f. resisting encroachment in to the creek or river and foreshore and
 - g. maintaining the stability of the flood defences, and examining opportunities to retreat the flood defences to increase flood storage, wildlife and aesthetic value and visual connections with the river or creek.

Justification

- 2.336** The River Thames has a special character and quality identified in the London Plan Policy 7.29 (The River Thames) which designates the Thames Policy Area. The policy option aims to give a higher profile to the River Thames as a previously undervalued resource and to ensure that in future the full value of the River is appreciated and celebrated. It brings together various policy references in the Core Strategy into one policy with a focus on the specific qualities new development should have in relation to the river. Relevant Core Strategy policies references are: Spatial Policy 2, Core Strategy Policy 12, 14, 16, 18, Strategic Site Allocation 2.
- 2.337** The River Thames in the borough has several important functions to play in terms of potential contribution to transport, contribution to nature conservation interest, flood defence, archaeology and other heritage assets. It is a Site of Importance for Nature Conservation of Metropolitan Importance and an Area of Archaeological Priority. These interests should be protected and enhanced by new development.

- 2.338** London Plan Policy 7.30 (London's canals and other rivers and waterspaces) states that development should respect the local character of these features. The Council considers that Deptford Creek and the sites adjacent represent a valuable historical, ecological and heritage asset for the borough which will be protected by this policy option. A conservation area has recently been declared at Deptford Creekside which recognises that the area retains a special old industrial character which should be preserved in future development. The Creek itself is a Site of Importance to Nature Conservation of Metropolitan Importance (as is the River Thames). The Creek walls are an important flood defence which have been managed to also enhance the ecological value of the Creek.
- 2.339** The policy option is also supported by London Plan Policy 7.4 (Local character) which proposes the protection of the character of landscapes, buildings and places on the Blue Ribbon Network. Lewisham Core Strategy Policy 14 refers to the Waterlink Way long distance walking and cycling route at Deptford Creekside. Lewisham Core Strategy Strategic Site Allocation 2 Convoys Wharf details the intention to extend the Thames Path along the frontage of this site adjacent to the Thames and other proposals to improve links to the Thames frontage.

Alternative option/s 33

There are no appropriate or justifiable alternative options for this policy in view of the policy framework set out in the London Plan and the Lewisham Core Strategy.

What does the sustainability appraisal say?

- 2.340** The sustainability appraisal showed beneficial impacts on population, human health, biodiversity, water, material assets, and cultural heritage. It anticipated that the policy option will benefit the local economy as the living and working environment is improved, with further positive effects for community health and well being and social cohesion. The protection afforded to the surrounding landscape and promotion of nature conservation interests will benefit biodiversity and the consideration given to the Thames flood defences will reduce flood risk. The sustainability appraisal showed adverse impacts on population and material assets. The policy promotes development in the area which will require resource use and the production of waste. Short term noise, vibration and air quality impacts are also likely during construction.
- 2.341** There is limited policy detail in the London Plan and Core Strategy with which to guide development of the Thames area within Lewisham. This could reduce the likelihood of the enhancement and development detailed above occurring, and result in many of the economic, environmental and social benefits being lost.

2.36 Public realm and street furniture

What is the aim of this policy option?

2.342 This policy option is aim to ensure that street design - lighting, paving, signage - plays a central element in achieving a high quality environment for the borough. Poor quality street furniture that is badly sited contributes to poor quality and cluttered environments and reduces accessibility for everyone using the street.

Council's recommended option 34

Public realm

1. Public spaces should be designed to be safe, inclusive, accessible, attractive and robust, enhancing existing connections and providing new connections as appropriate. The provision of public art will be encouraged. The Council will require street paving and furniture, public art and street signage to:
 - a. be well designed and generously sized using high quality materials
 - b. harmonise with the street scene
 - c. be sited to minimise visual clutter
 - d. provide legible signage
 - e. allow level and safe passage for all including people with disabilities including the careful design of shared surfaces with cyclists.
2. Trees are an important part of the street scene and should be accommodated wherever possible and carefully sited in line with the above principles.
3. In Conservation Areas the Council will seek to ensure that street furniture and paving is compatible with the character of the area.
4. The Council will seek the preservation of historic street furniture and other non designated heritage assets that are of value to the local street scene.

Justification

2.343 The Council wishes to enhance the appearance of streets in the borough and to minimise clutter. If care is not taken, and the street scene not viewed as a whole, incremental signage schemes, careless placement of litter bins, benches, telephone kiosks together with street lights, planters, recycling banks and junction boxes can result in confusion and untidiness. It may be necessary to review where facilities have been duplicated over time and excess numbers removed. The siting of trees, street furniture and good quality level paving is vital for all street users. Refer to DM Policy Option 24 Landscaping and trees, for further details.

2.344 The London Borough of Lewisham Streetscape Guide outlines clear principles that will be expected to be upheld when designing or redesigning the streetscape, as well as the bare minimum standards acceptable in terms of workmanship and materials. It also includes specific guidance to show how these principles and minimum standards can be met. Transport for London (TfL) have also produced Streetscape Guidance (2009) for use on TfL roads. London Plan Policy 7.5 (Public Realm) also refers to the issues in this policy option and supports the Council's approach.

- 2.345** Specific mention is made in this policy of the important and valuable contribution historic street furniture makes to the historic environment, its status as non-designated heritage assets and the need to preserve these features. The character and appearance of many Conservation Areas is enhanced and to a degree dependent on the treatment of roads, pavements and other public space.

Alternative option/s 34

It is considered that there are no realistic alternative options to this policy option due to the importance of maintaining a high quality and accessible street environment. The policy option could be omitted and instead rely on the Lewisham Streetscape Guide to provide guidance only together with London Plan Policy 7.5 Public Realm.

What does the Sustainability Appraisal say?

- 2.346** The sustainability appraisal showed beneficial impacts on population, biodiversity, material assets, cultural heritage and landscape. It notes the likely improvements to the townscape through the use of appropriate street furniture, and indirect positive effects on the environment through the promotion of street trees and vegetation which provides mitigation against air pollution and the urban 'heat island' effect. Overall, the policy option is likely to improve the aesthetic value of Lewisham, making it a nicer place to live and work. Adverse impacts on water use were noted as the trees require watering and upkeep, however this is considered to be offset through the benefits this vegetation provides.
- 2.347** Reliance only on the Lewisham Streetscape Guide and Core Strategy is likely to have similar positive and adverse effects to the recommended policy option. The Lewisham Streetscape Guide is very detailed and provides good guidance on streetscape design within Lewisham. It is likely that implementation of DM Policy Option 34 in conjunction with the use of the guidance, will bring about the greatest benefits to the Lewisham streetscape.

2.37 Listed Buildings, Conservation Areas and other designated heritage assets

What is the aim of this policy option?

- 2.348** This policy option aims to manage new development affecting designated heritage assets in a manner that sustains and enhances their heritage significance including the contribution of their setting.
- 2.349** Listed Buildings and Conservation Areas are 'designated heritage assets'. Other designated heritage assets relevant to Lewisham are registered parks and gardens (Horniman Gardens and Manor House Gardens are Grade II), scheduled monuments and the Maritime Greenwich World Heritage Site of which the buffer zone and part of the setting falls within Lewisham's boundary. It is considered that Core Strategy Policy 16 adequately covers issues relating to the Maritime Greenwich World Heritage Site Buffer Zone and setting.

Council's recommended option 35

New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens

A. General principles

1. For development proposals affecting heritage assets the Council will require a statement that describes the significance of the asset and its setting, and an assessment of the impact on that significance.
2. Where the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting, the Council will require clear and convincing justification. The Council will consider the wider public benefits which may flow from the development where these are fully justified in the impact assessment.
3. The Council encourages the adaptation of historic buildings to improve energy efficiency in line with the detailed guidance provided by English Heritage. Careful consideration should be given to the most appropriate options for insulation, power use and power generation. Intrusive interventions, such as externally mounted micro-generation equipment or external wall insulation, should be avoided where these would unacceptably alter the character and appearance of the heritage asset. The Council encourages the retention and thermal upgrading of historic windows.

B. Conservation areas

4. The Council having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving and enhancing their character and appearance, will not grant planning permission where:
 - a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials
 - b. development, which in isolation would lead to less than substantial harm to the building or area, but would cumulatively adversely affect the character and appearance of the conservation area
 - c. development adjacent to a Conservation Area would have a negative impact on the significance of that area.

Council's recommended option 35

Cont...

5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary by the use of Article 4 Directions.
6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists.

C. Listed buildings

7. In order to ensure the conservation of Listed Buildings the Council will:
 - a. Only grant consent for alterations and extensions to Listed Buildings which relate sensitively to the building and sustain and enhance its integrity and any characteristics, both internal and external, that contribute to its special interest
 - b. Have special regard to the desirability of preserving the setting of Listed Buildings in considering any application in their vicinity in terms of other policies, and consider opportunities for new development within the setting to enhance or better reveal the significance of the asset
 - c. Use its powers under Sections 47, 48 and 54 of the Planning (Listed Buildings and Conservation Areas) Act 1990, to ensure that Listed Buildings are maintained to a reasonable standard.
8. When considering applications for change of use of Listed Buildings, the Council will consider the contribution of the existing use and the impact of any proposed new use to the significance and long-term viability of the historic building. The Council will seek to ensure that the building is put into an optimum viable use i.e. the one that causes least harm to the significance of the building, not just through initial changes but also as a result of subsequent wear and tear or any likely future changes. The implications of complying with Building Regulations, such as fire escapes, will be taken into account prior to determining applications for change of use.

D. Scheduled Ancient Monuments and Registered Parks and Gardens

9. Scheduled Ancient Monuments will be protected and preserved in accordance with Government regulation. Planning permission will be refused which adversely affects their sites or settings.
10. When considering the impact of a development proposal on Registered Parks and Gardens in Lewisham, the Council will consider that any loss or substantial harm to these assets will be in wholly exceptional circumstances. The Council will apply the provision in Clause 2 of the above policy to the assets.

Justification

- 2.350** Core Strategy Policy 16 sets out a framework for the protection of the borough's designated heritage assets. This policy summarises the steps the borough will take to manage changes to Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Registered Parks and Gardens so that their value and significance as designated heritage assets is

maintained and enhanced. The Council has an ongoing programme to review the borough's area, proposing buildings suitable for statutory listing and designating new conservation areas and extending existing ones as appropriate and as resources permit.

- 2.351** The significance of heritage assets can be harmed or lost through alteration or destruction of the asset or development within its setting. The policy is intended to ensure that the particular significance of a heritage assets and the value it holds for this and future generations is fully understood. This understanding serves as a baseline for assessing the impact of any development so that that proper weight can be given to its conservation.
- 2.352** The value of the townscape of a conservation area, for example, depends on much more than the quality of individual buildings – on the historic layout of property boundaries and thoroughfares; on a particular 'mix' of uses; on characteristic materials and detailing; on street furniture and hard and soft surfaces; on vistas along streets and spaces between buildings. Not all elements of a conservation area though contribute to its significance and their replacement and alterations can represent opportunities for the enhancement of the area, including enhancement by development of high quality and innovative design. The emphasis is to guide and control development, not to prevent it.
- 2.353** The character of a conservation areas can heavily depend on the cohesiveness of form and consistency of materials and detailing of buildings. The alteration or loss of one individual feature to one building may appear minor in the wider context, but incrementally such small changes can erode the special interest of an area. The Council has made Article 4 Directions to a number of conservation area to protect distinctive features.
- 2.354** The Council supports improvements to the energy performance of listed buildings and buildings in Conservation Areas. The suitability of thermal improvements measures needs to be carefully considered with regard to the effect on the appearance and characteristics of the building. External wall insulation, for example, can markedly alter the appearance of a building, which makes other measures such as roof insulation, draught-proofing, energy efficient lighting a better and more suitable investments for reducing energy use. Detailed advice is available from English Heritage and the Council's Conservation team.
- 2.355** The Council has a duty to preserve the character of Listed Buildings under the provisions of Sections 54-56 of the Planning (Listed Buildings and Conservation Areas) Act. The NPPF and the Historic Environment Planning Practice Guide to PPS5 also provide guidance to assessing development applications for Listed Buildings. The policy option seeks to achieve this aim through measures to control, improve and guide changes to Listed Buildings.
- 2.356** The best way of securing the upkeep of historic buildings and areas is to keep them in active use. For the great majority this must mean economically viable uses if they are to survive and new, and even continuing uses will often necessitate some degree of adaptation. The range and acceptability of proposed uses must therefore by a major consideration when the future of listed buildings is in question. The aim should be to identify the optimum viable use that is compatible with the fabric, interior and setting of the historic building.

Alternative option/s 35

The reasonable alternatives associated with this option are limited due to the importance placed on heritage assets by the Government and Mayor of London. This need has been reflected in the Lewisham Core Strategy. However, alternative options could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a local policy.
2. Relying on the NPPF and the Historic Environment Planning Practice Guide to PPS5.

What does the sustainability appraisal say?

- 2.357** The sustainability appraisal showed beneficial impacts on population, biodiversity, material assets, cultural heritage, waste. The policy option seeks to protect and enhance buildings (and in particular cultural heritage assets) within conservation areas. This is likely to have long-term benefits for cultural heritage assets as buildings of historical significance are protected. There may be other indirect benefits for biodiversity, as bats favour older buildings; community identity, as cultural heritage assets give character to an area and have a historical significance; and waste production, as few buildings are demolished and re-built in the conservation area.
- 2.358** The protection of cultural heritage assets may result in land-use conflicts as various use-types may be prohibited within certain buildings. This may restrict development and have adverse effects on the local economy in the short - medium term. Retention of heritage assets may also have an adverse effect on the environment and resource use; older buildings may not be able to meet current energy efficiency standards. Although dependent on implementation, retention of older housing stock may also reduce the range of housing types and tenures available, thereby entrenching existing inequalities in the borough. There may also be related adverse effects on human health and social cohesion as older buildings are retained, and a reduced amount of good quality, affordable housing is available.
- 2.359** Although the Core Strategy mentions a number of conservation areas within Lewisham and promotes the protection and enhancement of these areas, there is far less detail in the Core Strategy policy, when compared to DM Option 35. The policy option is more detailed and prescriptive and is likely to be clearer for developers and the planning authority to enforce.

2.38 Non-designated heritage assets including locally listed buildings, areas of special local character and assets of archaeological interest

What is the aim of this policy option?

Non-designated heritage assets comprise locally listed buildings and structures, areas of special local character, groups of buildings of townscape merit and areas of archaeological priority identified by the Council for their contribution to the borough's local character and distinctiveness. This policy option seeks to ensure that the value and significance of the borough's non-designated heritage assets is protected so that they may continue to contribute to the richness of the borough's historic environment and inform the future development and regeneration of the borough. An up-dated list of Locally Listed Buildings and structures has been prepared by the Council which should be referred to by applicants.

Council's recommended option 36

Non designated heritage assets including locally listed buildings, areas of special local character and areas of archaeological interest

A. General principles

1. The Council will protect the local distinctiveness of the borough by sustaining and enhancing the significance of non-designated heritage assets.
2. Development proposals affecting non-designated heritage assets should be accompanied by a heritage statement proportionate to the significance of the asset which justifies the changes to the asset.
3. Non-designated heritage assets may be identified during the development management process.

B. Locally listed buildings

4. The Council will seek to retain and enhance locally listed buildings and structures and may use its powers to protect their character, significance and contribution made by their setting, where appropriate.
5. The Council will resist the demolition of locally listed buildings and expect applicants to give due consideration to retaining and incorporating them in any new development.

C. Areas of special character

6. Development in areas of special local character should sustain and enhance the characteristics that contribute to the special local spatial, architectural, townscape, landscape or archaeological distinctiveness of these areas.
7. The Council will resist demolition of unlisted buildings in areas of special local character where these contribute to architectural and townscape merit and local distinctiveness of the area.

D. Non designated heritage assets of archaeological interest

8. The Council will ensure that non designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.

Council's recommended option 36

9. The conservation, protection and enhancement of the archaeological heritage of the borough will be promoted through:
 - a. Requirements to assess and plan for the archaeological implications of development proposals that may affect the archaeological heritage of a site which may require preliminary archaeological site evaluations. Proposals on sites within areas of archaeological priority as shown on the Policies Map should be accompanied by an evaluation. Evaluations should be commissioned from professionally qualified archaeological organisations or consultants.
 - b. Ensuring development proposals safeguard archaeological sites and seeking to ensure that where justified important archaeological remains are where possible permanently preserved in-situ with public access, display and where appropriate given statutory protection.
 - c. Where permanent preservation is not justified the remains are investigated, recorded and subsequently published by a recognised archaeological organisation prior to the start of development.
 - d. Where remains unexpectedly come to light seeking ensure their preservation or their recording in consultation with the developer.

Justification

- 2.360** There are a number of buildings and groups of buildings of local historic, architectural or townscape interest which greatly contribute to the borough's distinctiveness and sense of place, but may not qualify as designated heritage assets. The Council has recognised their importance and value as heritage assets by adopting them as locally listed buildings and, resources permitting, has an ongoing programme of identifying new additions to the list.
- 2.361** There are also many areas in the borough which possess sufficient architectural, townscape and environmental quality to make them of local value. The Council is currently working on compiling a list of such areas and establishing criteria for their adoption. Similar to conservation areas, areas of special local character will be identified based upon their architectural or townscape merits, but they will also include other elements of the historic environment such as locally important archaeology, landscapes or areas of distinct topography e.g. Sydenham Hill. Some of these area may qualify for conservation area designation in the future.
- 2.362** In line with the requirements of the NPPF the effect of development proposals on the particular significance of such non-designated heritage assets will be taken into account. The Council wishes to encourage the retention and restoration of buildings contributing to the character of these areas and may develop supplementary planning guidance (SPG) and, if necessary, make Article 4 Directions to prevent their demolition or development that would harm the area's particular significance. The existing list of Locally Listed Buildings will be added to when necessary or as a result of an assessment arising from development proposals.
- 2.363** The Council wishes to protect its archaeological heritage and to ensure that any important remains are preserved and in suitable cases effectively managed as an educational, recreational and tourism resource. Archaeological remains are a community asset and provide a valuable picture of the history and development of the local areas as well as London as a whole. They are a finite and fragile resource, vulnerable to modern development. The requirements of the policy option will generally come into force when extensive redevelopment

is proposed involving excavation or foundation work which may disturb or expose relatively undisturbed remains below the level of current building development. Appendix 3 explains the significance of the various Areas of Archaeological Priority shown on the Policies Map and gives an indication of the type and age of archaeological remains that might be discovered.

Alternative option/s 36

The reasonable alternatives associated with this option could include:

1. Reliance on the London Plan and Core Strategy
2. Reliance on the National Planning Policy Framework and on the guidance in the Companion Guide to PPS5.

What does the Sustainability Appraisal say?

- 2.364** The SA notes beneficial impacts on biodiversity, material assets, cultural heritage, landscape. The policy option promotes the protection of other cultural heritage assets and is likely to result in direct long term benefits for the protection of these features. Protection and retention of old building stock may also reduce the amount of building waste produced and could have indirect benefits for biodiversity as bats often favour older buildings as roost sites. Adverse impacts were identified on population, human health, climatic factors, water, and air. The policy option may impose restrictions on certain development within Lewisham which may have an adverse effect on the local economy. Furthermore, retention of older housing stock may entrench inequalities in health and access to good affordable homes, thereby having an adverse effect on human health and wellbeing. However, these adverse impacts on human health might be mitigated by the positive impacts on perceptions of health and mental well-being by ensuring the retention of heritage assets that are familiar, well-loved and provide a sense of stability, history, continuity and place in the community. Older building stock is also unlikely to meet current energy efficiency standards and may therefore have an adverse effect on resource use and climate change mitigation and adaptation.
- 2.365** The alternatives to the DM policy Option are likely to be less clear and give less guidance to developers.

2.39 Demolition or substantial harm to designated and non-designated heritage assets

What is the aim of this policy option?

The aim of this policy is to ensure that proposal which lead to substantial harm or demolition are proposed, these are fully justified and that all options are explored to avoid unnecessary harm to or loss of heritage assets.

Council's recommended option 37

Demolition or substantial harm to designated and non-designated heritage assets

1. Proposals for the demolition or substantial harm to a heritage asset will only be considered under exceptional circumstances where the public benefits outweigh the loss of or harm to the asset. The Council will require applicants to demonstrate that there is no practical way of realising the benefits without demolishing the building or causing substantial harm.
2. Where demolition is proposed, the following will be taken into account:
 - a. The significance of the asset, architecturally, historically, contextually; and any communal value
 - b. The condition of the asset and the economic viability of its repair and re-use
 - c. The adequacy of marketing efforts made to retain the asset in use
 - d. The adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership
 - e. The public benefits of any alternative proposal for the site.
3. Development proposals involving substantial structural alterations to a heritage asset need to demonstrate that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.
4. Where demolition is proposed on grounds that a building's condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably qualified conservation professional and must describe, explain and illustrate the structural problems, and discuss repair options.
5. Where repair is not economically viable, the Council will require full supporting evidence, for example:
 - a. a valuation of the existing building and site
 - b. a full survey identifying the repairs required
 - c. development costs including a costed schedule of repairs
 - d. an estimate of the value of the repaired property, including potential yields
 - e. evidence that the property has been marketed for a reasonable period at a price reflecting its condition

Where there is evidence of deliberate neglect or damage to a heritage asset, the deteriorated state of the asset will not be taken into account in the Council's decision.

Council's recommended option 37

6. Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.
7. Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development.

Justification

- 2.366** Heritage assets are an irreplaceable resource. As custodians of our past we have a responsibility to ensure that proposals for substantial harm or demolition are carefully weighed and all options are being explored so as not to deprive future generations of the enjoyment of our built heritage we enjoy today. Given their irreversible nature, demolition and destruction should be seen as a last resort after every option to secure a viable future for the asset has been exhausted.
- 2.367** Substantial harm to an asset may be caused by direct physical intervention, by unsympathetic extensions, or by development within the setting that may affect the way in which an asset is appreciated. The fabric will always be an important part of an asset's significance, and where substantial structural alterations are proposed, applicants may be required to demonstrate by way of a structural survey and methodology statement that no unacceptable risk to the integrity of the building and loss of fabric will occur. These requirements may also apply to alterations that appear uncontroversial but have the potential to compromise the structural integrity of the building and lead to substantial harm if not properly executed, for example, the introduction of basements.
- 2.368** The purpose of marketing is to demonstrate that no viable use for the asset can be found. The Council is keen to ensure that these efforts have been genuine and given the best chance of succeeding. If market conditions are poor, applicants may be advised to 'mothball' the asset until conditions have improved to the point when a negative response can be reasonably ascribed to a genuine lack of interest in the asset itself rather than to market conditions.
- 2.369** The spatial policies in the Core Strategy underpin this approach by seeking to preserve local character and the historic character and significance of all the spatial areas in the borough. Core Strategy Policy 16 seeks to ensure that the value and significance of the borough's heritage assets and settings will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.
- 2.370** This approach is supported by London Plan Policy 7.9 (Heritage Assets and Archaeology) which states that development should 'identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate and that boroughs should seek to maintain and enhance the contribution of these assets.
- 2.371** The policy option is consistent with NPPF (Section 12). Further explanation and support is to be found in the Companion Guide to PPS5.

Alternative option/s 37

The reasonable alternatives associated with this option could include:

1. Relying on the policies in the London Plan and Core Strategy rather than a local policy.
2. Relying on the NPPF and on the guidance in the Companion Guide to PPS5.

What does the Sustainability Appraisal say?

- 2.372** The sustainability appraisal showed beneficial impacts on population and human health. The policy option provides clear guidance to developers and protects these assets in unless it can be demonstrated their retention is no longer viable. The requirement for replacement development will provide beneficial impacts to the community through the provision of sustainable places which may be difficult when considering the retrofit of existing infrastructure. Protection and retention of old building stock may also reduce the amount of building waste produced and could have indirect benefits for biodiversity as bats often favour older buildings as roost sites. Adverse impacts are noted on material assets, population, air and cultural heritage. These may be realised where demolition is allowed and the subsequent material use and construction impacts associated with new development (including air, water and waste).
- 2.373** Alternatives 1 and 2 are likely to have similar positive and adverse effects to the recommended option. The key difference being that DM Policy Option 37 is more prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation and provide certainty for developers.

2.40 Telecommunications

What is the aim of this policy option?

2.374 Modern telecommunications systems are an essential component of an up to date economy. The development of high speed broadband technology will also enhance the provision of local local community facilities and services. This policy option seeks to ensure that new telecommunications infrastructure is sited appropriately and the number of sites used minimised.

Council's recommended option 38

Domestic satellite dishes and telecommunications equipment

1. Satellite dishes and other telecommunications equipment should always be designed and sited where they will have the least detrimental visual impact, in particular not on a principal street frontage. They should also not be detrimental to the character of Conservation Areas, Listed buildings and other designated and non designated heritage assets or to the amenities of a residential area. This will usually entail permitting not more than one satellite dish per building and resisting visually harmful development in respect of premises subject to an Article 4 Direction.
2. In carrying out this Policy the Council will:
 - a. encourage the provision of communal telecommunications equipment in new development and rehabilitation schemes and where time limited consents have been granted and
 - b. encourage the removal or upgrading of older telecommunications equipment in order to minimise visual impact.

Radio and telecommunications masts and infrastructure

3. In the case of development proposals for radio and telecommunications masts, including for prior approval under Part 24 of the General Permitted Development Order, these should be supported by the necessary evidence to justify the proposed development. The Council will seek to ensure, in conjunction with operators and developers that in each case the best possible environmental, and operational solution is arrived at. This will include:
 - a. provision of evidence that the possibility of erecting antennae on an existing building, structure, or mast site has been explored, and/or in the case of a new mast or base station that the cumulative exposure when operational will not exceed International Commission in non-ionising radiation protection guidelines
 - b. in the case of site sharing provision of evidence that the site can accommodate any additional apparatus required
 - c. use of design that minimises the size of or camouflages telecommunications apparatus
 - d. provision of evidence that new telecommunications infrastructure will not cause significant and irremediable interference with other electrical equipment, air traffic services or other national services requiring radio communications
 - e. Provision of evidence on the outcome of consultations with organisations with an interest in any proposed development particularly where a mast is to be installed near a school or college or within a statutory safeguarding zone surrounding an aerodrome or technical site.

Justification

- 2.375** The Council wishes to facilitate telecommunications development, including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the development on valued features of the borough's environment is minimised and the new development meets all relevant safety guidelines and safeguardings.
- 2.376** The policy option is consistent with the NPPF (Section 5, paragraphs 42 - 46).

Alternative option/s 38

1. The paragraphs on Radio Telecommunications Masts and Infrastructure repeats what is in the National Planning Policy Framework and Part 24 of the General Permitted Development Order which could be relied on without the necessity for this policy. The paragraphs on domestic equipment could rely on Part 25 of the General Permitted Development Order.

What does the sustainability appraisal say?

- 2.377** The sustainability appraisal showed beneficial impacts on human health, material assets, cultural heritage, and landscape. The policy option protects the landscape and townscape from adverse impacts arising from telecommunications equipment. The policy option is likely to protect cultural heritage assets and improve the aesthetic appeal of Lewisham. This may make Lewisham a more attractive place to live and work, thereby having indirect positive impacts on health and wellbeing. The sustainability appraisal showed adverse impacts on waste. The policy option promotes the replacement and up-grade of infrastructure. This may increase waste production within the borough.
- 2.378** Reliance on the NPPF and legislation is likely to have similar positive and adverse effects to the recommended option. The key difference being that DM Policy Option 38 is prescriptive and detailed towards the needs of Lewisham and therefore more likely to have success at implementation.
- 2.379** Reliance on the London Plan and Core Strategy instead of the implementation of DM Policy Option 38 would lead to much greater uncertainty over the considerations and restrictions to the development of telecommunications equipment in Lewisham. This alternative would not have the same beneficial impacts as the policy option and does not provide the implementation certainty for this type of development.

2.41 Public conveniences

What is the aim of this policy option?

- 2.380** This policy aims to ensure the provision of an adequate level of public conveniences in the borough. They are a particularly important facility for a number of groups, such as the elderly, disabled and parents with young children and are a necessity in areas that generate multiple and/or lengthy trips.

Council's recommended option 39

Public conveniences

1. The Council will expect new developments which attract large numbers of visitors/customers to make adequate provision for public conveniences, which are well located and signed in relation to pedestrian flows, car parks, public transport and other public places and are accessible for all.

Justification

- 2.381** There is a need for the provision of public conveniences in developments that attract a large number of people. This includes as a minimum retail development over 1,000 square metres of gross floorspace and entertainment uses of 500 square metres gross floorspace.
- 2.382** Inclusive and accessible toilet provision is essential to meet the needs of residents, workers and visitors. Without these facilities particular groups like people with disabilities, older people, carers with children and tourists may be deterred from spending long periods of time at key locations, such as in town centres. A lack of toilets can therefore affect the economy of an area. It can also impact on health, as a lack of facilities deters people from walking and cycling.
- 2.383** The Council will also seek to negotiate for the provision of these facilities within existing buildings.

Alternative option/s 39

The reasonable alternative associated with this option could include:

1. Use floorspaces in the policy to identify minimum requirements in the policy option rather than in the justification. This would result in a greater level of detail which would normally be included in a policy justification or in an SPD and might make the policy less flexible in application .
2. Make no policy requirements for provision of public conveniences and rely on the Core Strategy. This might mean that none at all are provided as the provision of these facilities is not compulsory in the Building Regulations.

What does the sustainability appraisal say?

- 2.384** Beneficial impacts were identified on population and human health. Through encouraging the adequate provision of accessible public conveniences for new developments, there may be minor positive effects on improving the health and well-being of the population. The provision of equitable facilities as community infrastructure also promotes social inclusion and has the potential to reduce anti-social behaviour. No adverse impacts are identified.
- 2.385** Alternative 1 is likely to have similar impacts as the recommended option, however, whilst this alternative may provide greater detail for developers in implementing this policy option, the inclusion of specific floorspaces for minimum requirements may lead to unnecessary restrictions on development within Lewisham. This may have indirect impacts on economic growth within the area. Alternative 2 has similar positive and adverse effects as in DM Policy Option 39, however as public conveniences are not specifically referenced in Core Strategy policies, this alternative is unlikely to provide the detail and certainty to ensure this public infrastructure is development to the benefit of the Lewisham community.

2.42 Community facilities

What is the aim of this policy option?

2.386 The aim of this policy is to promote the development of innovative solutions to the provision of community facilities. Such facilities lie at the heart of neighbourhoods and are important in promoting good social cohesion and opportunities to meet, socialise, learn and develop interests and skills. In terms of this policy, community facilities refer not only to community halls and centres, but to all other spaces where people can meet, such as rooms above shops and pubs, as well as sports and leisure space. It does not include places of worship that are dealt with separately by DM Option 43, but may include community halls or other spaces that are linked to places of worship.

Council's recommended option 40

Innovative community facility provision

1. The Council will encourage, where appropriate, the use of innovative solutions to the provision of community meeting space including:
 - a. the potential for new or extended schools to make usable community, sports and leisure space accessible to local people outside of teaching hours and
 - b. the temporary use of vacant or unused inside and outside space for community uses, where it is able to provide a safe and appropriate environment, there is no detriment to local amenity and it is in accordance with the rest of the Local Plan.

Justification

2.387 The protection of existing community facilities and the promotion of new provision is comprehensively dealt with by the NPPF (paragraph 70), the London Plan Policy 3.16 and Core Strategy Objective 11 and Policy 19. The Infrastructure Delivery Plan (IDP) identifies a wide range of existing community facilities in the borough, numbering over 90, including community centres, community halls, offices for voluntary organisations and places of worship (with community halls). As a minimum, these facilities and any new equivalent facilities are protected by the existing wider policy context.

2.388 Alongside the more formal and traditional provision of community space in halls and centres, the Council are aware of local communities using opportunities to meet in many informal locations, such as pubs, cafés, schools, industrial units and other locations. Recommended option 40 encourages the use of innovative alternative meeting space on condition that it provides a safe and appropriate environment for the activity taking place. Provision and access to good quality community facilities has a direct positive impact on human health and wellbeing and will assist in the implementation of the Core Strategy and London Plan policies identified above as well as the recommendations of the Infrastructure Delivery Plan.

2.389 Schools that are new, extended, rebuilt or refurbished will be expected to consider how best to make their facilities available to the public outside of teaching hours to add to the quantum of community space available.

2.390 The Portas review of high streets in 2012, stated that vacant retail units could be utilised temporarily for other uses, including community uses, until a retail occupier could be found. Following this example, practical opportunities for the temporary use of inside and outside

space that can be reasonably utilised to deliver community space will be encouraged. Potential sources of space could include vacant units usually used for retail, commercial, other business or infrastructure, and empty or under utilised brownfield land.

- 2.391** Recommended option 19 details the Council approach towards pubs in the borough. Part of the recommended option includes consideration of the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in provision. Consideration of the value and opportunities for the encouragement of community pub space should be included within both this recommended option and the public houses recommended option.

Alternative option/s 40

An alternative to this option could be to:

1. Rely on the approach in the Core Strategy.

What does the sustainability appraisal say?

- 2.392** The sustainability appraisal showed positive impacts including the reduction of long term deprivation and the improvement in health inequalities through the promotion of school facilities for community use. Additionally, the temporary use of vacant space will assist with reducing crime and maintaining premises. Minor negative impacts have been identified for environmental objectives such as flood risk, air quality, waste and climatic factors. These are impacts that are present for most forms of development and are either temporary effects where the impact will become minimal once construction is completed, or are subject to standard mitigation techniques. The alternative shows that the Core Strategy approach has similar positive and adverse effects as for the recommended option. However, the inclusion of the recommended option provides greater detail strengthening the approach to enhancing community provision.

2.43 Nurseries and childcare

What is the aim of this policy option?

- 2.393** The aim of this policy option is to ensure an appropriate level of nursery and childcare provision exists that is spread equitably across the borough. The Borough of Lewisham has one of the highest proportions of children in London and there is subsequently a considerable need for childcare and nursery provision.

Council's recommended option 41

Nurseries and childcare

1. The Council will require applicants for day nurseries and facilities for the care, recreation and education of children to consider:
 - a. the acceptability of the loss of the existing use
 - b. traffic volumes and the effect on congestion
 - c. accessibility by walking, cycling and public transport
 - d. access, egress, cross-site movement and parking / drop off areas, including for disabled users and
 - e. the impact on local residential amenity, including noise.

Justification

- 2.394** The Council do not propose to deliver nursery provision directly, but recognise the need for provision by private, community and other voluntary sources. A representative level of provision is required across the borough to support working families.
- 2.395** The London Plan Policy 3.16 includes nurseries as part of social infrastructure and encourages local authorities to ensure that there is adequate provision of facilities. The Core Strategy Strategic Objective 11 and Policy 19 respond to this need by stating that the Council will ensure provision of a range of education and community facilities in the borough. Recommended option 41 sets out how the Council seek to implement the Core Strategy by detailing the criteria which applications for new nursery facilities will be required to address. The Council will only allow facilities where it can be demonstrated that the criteria listed have been satisfactorily met.
- 2.396** The Childcare Sufficiency Assessment, 2008, for Lewisham identifies a number of wards with a deficiency in the amount of childcare places available. These are Blackheath, Lee Green, Rushey Green, Forest Hill and Sydenham. The preferred option will support an increased level of provision in these areas, or the appropriate areas as highlighted by any further assessment of provision.
- 2.397** Applicants should seek to find the most appropriate location for new nursery provision in an area. Existing vacant D uses are considered most appropriate and only after this should existing C3 uses be considered. In most circumstances, detached C3 use will be seen as more appropriate for conversion to a nursery than semi-detached, which in turn is more appropriate than terraced housing. End of terrace locations will likely be treated the same as semi-detached properties. This approach will assist in protecting residential amenity.

- 2.398** On occasions when an existing residential use is considered acceptable for conversion to a nursery, a condition will be applied to the property to ensure that any future change from nursery use is only back to residential use for the entire property.

Alternative option/s 41

The alternatives associated with this option could include:

1. Rely on the approach in the Core Strategy.

What does the sustainability appraisal say?

- 2.399** The sustainability appraisal shows the recommended option will lead to a positive impact on improving access to skills and training for both children and parents. The community safety elements of the option will benefit the reduction of health inequalities and prevent long term negative impacts. Minor negative impacts have been identified for environmental objectives such as flood risk, air quality, waste and climatic factors. These are impacts that are present for most forms of development and are either temporary effects where the impact will become minimal once construction is completed, or are subject to standard mitigation techniques. There is a small concern that nursery provision could compete for premises with commercial businesses, however suitable employment policies are in place to protect employment land. The alternative shows that the Core Strategy approach has similar positive and adverse effects as for the recommended option. However, the inclusion of the development management option provides greater detail on the prevention of negative impacts on local residential amenity.

2.44 Art, culture and entertainment facilities

What is the aim of this policy option?

2.400 The aim of this policy option is to promote the provision of art, culture and entertainment facilities in the borough. These facilities generate employment and economic benefits for Lewisham, provide vitality and vibrancy to town centres and have formed a number of established creative pockets.

Council's recommended option 42

Art, culture and entertainment facilities

1. The Council will encourage new or extended art, culture and entertainment uses (including commercial uses) where there is no unacceptable impact on local amenity.
2. The Council will protect existing art, culture and entertainment uses. Redevelopment of such sites will only be allowed where there is re-provision in another form / location.

Justification

- 2.401** The NPPF (paragraph 70) requires local authorities to plan positively for the provision of community facilities, including cultural buildings and states (paragraph 156) that cultural facilities should be treated as a strategic priority for local plan making. This approach is supported by the London Plan through policies 4.6 and 3.16.
- 2.402** The Core Strategy sets out the strategic context for art, cultural and entertainment facilities in Strategic Objective 11 and Policy 19 which states that the council will work with its partners to protect and enhance art, culture and entertainment facilities. Examples of such facilities in the borough include the Catford, Albany and Brockley Jack Theatres, Rivoli Ballroom, Laban Dance Studios, various galleries and showrooms and neighbourhood initiatives such as those around Deptford Cross.
- 2.403** Recommended option 42 supports the implementation of the Core Strategy and adds to its approach by detailing when new and/or redeveloped individual facilities may be acceptable. New facilities will be encouraged and large scale uses directed towards town centres or other locations with good accessibility and where local amenity is not harmed.
- 2.404** The Council will only allow the loss of a facility where a suitable replacement facility can be supplied on-site or nearby or in a suitable location that is forming a new community hub. Re-developed facilities must still meet the need to have good accessibility and be sited where there is no detriment to local amenity.
- 2.405** The recommended approach supports the Lewisham Arts Strategy 2009 - 2015 which seeks to develop Lewisham's identity as a vital, creative place to live, work and learn through the provision of high quality creative destinations and the support and encouragement of the cultural and creative sector.

Alternative option/s 42

The alternatives associated with this option could include:

1. Locate facilities in existing town centres only.
2. Allow redevelopment of art, culture and entertainment facilities to other commercial uses.
3. Relying on the policies in the London Plan and Core Strategy

What does the sustainability appraisal say?

- 2.406** The sustainability appraisal shows the recommended option will be beneficial to the economic growth of a variety of sectors. The policy option will also be beneficial to social inclusion, education, skills and training and ensures protection of amenity. Minor negative impacts have been identified for environmental objectives such as flood risk, air quality, waste and climatic factors. These are impacts that are present for most forms of development and are either temporary effects where the impact will become minimal once construction is completed, or are subject to standard mitigation techniques.
- 2.407** Alternative 1 shows that this would concentrate uses in one area that is served by sustainable transport, preventing anti-social behaviour elsewhere in the borough. However, this alternative option would be detrimental to social inclusion and increase anti-social behaviour in town centres. Alternative 2 would be beneficial to other commercial uses as it would increase the supply of available land. The negative impact of this alternative is the loss of art, culture and entertainment facilities that would be detrimental to social inclusion. The environmental concerns for the recommended option would also remain as concerns for both alternative 1 and 2. Alternative 3 has very similar positive and adverse effects as in the recommended option. The policy within the Core Strategy seeks to ensure a range of health, education, policing, community, leisure, arts, cultural, entertainment, sports and recreational facilities and services are provided, protected and enhanced across the borough. However, the recommended option includes a greater emphasis on the prevention of negative impacts on local amenity than this alternative.

2.45 Places of worship

What is the aim of this policy option?

- 2.408** The aim of this policy option is to support the growing demand for faith premises in the borough and to ensure that any new provision is appropriately located, designed, constructed and managed to both benefit users and protect local neighbourhoods.

Council's recommended option 43

Places of worship

1. The Council's preferred locations for the development of public places of worship are the network of major and district town centres as defined in Core Strategy Policy 6.
2. Proposals for development in the major and district town centres and all other areas will only be considered in locations that are:
 - a. highly accessible to users through public transport and cycling and walking routes and
 - b. able to provide an adequate level of parking.
3. All applications for places of worship will be required to:
 - a. demonstrate they are not causing a detrimental effect to employment or future employment space
 - b. demonstrate that there will be no detrimental effect on local amenity through noise, hours of operation or any other environmental impacts
 - c. provide a travel plan to show that the points detailed in Part 1 of this option and other transport issues can be mitigated
 - d. be delivered to the highest design standards
4. Existing places of worship that meet the criteria above will be protected from redevelopment.

Justification

- 2.409** Recommended option 43 is consistent with the NPPF (paragraph 70) which requires planning authorities to plan positively for the provision and use of community facilities including places of worship. The recommended option also delivers the London Plan Policies 3.1 (Ensuring equal life chances for all) and 3.16 (Protection and enhancement of social infrastructure) which require local authorities to consider where provision should be made, in particular in relation to growing populations.
- 2.410** The Council believe that the most appropriate location for places of worship is in the network of major and district town centres as is defined in Core Strategy Policy 6. Such locations are the most sustainable in terms of transport accessibility and offer existing public parking arrangements. Residential amenity and employment locations will also be protected by utilising town centre sites. Other locations outside of the network of town centres may be considered if the criteria outlined in the recommended option can be satisfactorily met.
- 2.411** It is important that proposals for faith premises are located in highly accessible areas to ensure that they allow access not only by car, but also by cycling, walking and public transport. Evidence of existing premises demonstrates that even in accessible locations, faith premises

generate significant car travel and associated parking requirements. Applicants should therefore ensure that any impact upon local streets and public parking provision is considered. The impact of car movements and parking will need to be assessed through a travel plan.

- 2.412** Faith premises are not permitted in employment units that could be used to provide local job opportunities or in locations which could be used to provide future job opportunities. Core Strategy Policies 3, 4 and 5 protect employment locations in the borough.
- 2.413** Proposals in residential areas will not generally be considered suitable where there is a detrimental impact on the amenity of local people. In order to be acceptable, proposals will need to prove that there will be no negative impact on local residents in terms of noise, hours of operation and any other environmental impacts. Outside hours of operation, new developments will be encouraged to make their facilities available for the benefit of the local members of the public.
- 2.414** New developments should be delivered using the highest design standards. Existing places of worship provide a significant number of local landmarks and attractive buildings in the borough and new developments should seek to add to this network.

Alternative option/s 43

The alternative associated with this option could include:

1. Allow provision only in edge of town centre locations.
2. Relying on the policies in the London Plan and Core Strategy.

What does the sustainability appraisal say?

- 2.415** Sustainability appraisal of the recommended option shows that this would concentrate uses in town centres that are served by means of sustainable transport. The detailed criteria for the policy option ensure that places of worship would be located in appropriate buildings, preserving other uses, such as commercial and industrial space from being adapted. The criteria also ensure places of worship will be appropriately designed, constructed and managed. Minor negative impacts have been identified for environmental objectives such as flood risk, air quality, waste and climatic factors. These are impacts that are present for most forms of development and are either temporary effects where the impact will become minimal once construction is completed, or are subject to standard mitigation techniques. Alternatives 1 and 2 shows that this would be detrimental to social cohesion due to location restrictions. Other negative impacts identified were the impacts on congestion and air quality if locations were not accessible by a range of sustainable transport options.

- 3.1** This section sets out how the Council proposes to deliver the policy options and how they will be monitored to ensure Council objectives are being met.

Delivery

- 3.2** Before Council adopts the DMLP it will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. This means the DMLP must be:⁽²⁷⁾
- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
 - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities and
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 3.3** As the DMLP implements the Core Strategy, the Council will continue to ensure the Core Strategy is delivered in accordance with Section 9. Specific aspects associated with the DMLP will include fostering the development management process by ensuring continued partnership working (internal and external) and the Council taking a role as coordinator. The DMLP will provide clarity and consistency for applicants and others involved in the development management process. This will be enhanced by pre-application discussions between applicants and the Council.
- 3.4** The Council's approach to planning obligations is outlined in a separate SPD and will be used where appropriate. This provides a degree of certainty for the Council and the developer. Obligations sought will contribute to delivering the policy options outlined in this document. The Council will introduce a Community Infrastructure Levy (CIL) by 2014.

Monitoring

- 3.5** The DMLP along with other local development documents will be monitored to ensure the delivery of strategic objectives. This allows continuity in the Plan-Monitor-Manage approach used by the Council. Progress is reported in the Annual Monitoring Report (AMR). Specific targets will be prepared for the draft DMLP once the policy options have been agreed.

Use of conditions

- 3.6** There may be requirements to impose conditions on development proposals to mitigate negative impacts to make them acceptable. Any conditions that the Council imposes on development proposals must be consistent with relevant guidance, including being necessary, relevant, effective and enforceable.

Temporary uses

- 3.7** The Council will continue to support the temporary use of vacant or underused space where it is appropriate to do so, is to the benefit of local communities and is in accordance with all other parts of the Local Development Plan and the Use Classes Order. Opportunities for the

27 Paragraph 182, NPPF

innovative temporary use of space, particularly in relation to arts and culture, community facilities, shopping centres and open spaces, could provide important local services and contribute to the vitality and viability of centres in the borough.

- 3.8** Arts and cultural uses and areas contribute to the economic and social success of an area and can play an important role in place shaping. In line with London Plan Policy 4.6, the Council will support the temporary use of vacant buildings for performance and creative work.
- 3.9** Community facilities can be suitable temporary uses of vacant or unused inside and outside space. These facilities lie at the heart of neighbourhoods and are important in promoting good social cohesion and opportunities to meet, socialise, learn and develop interests and skills. The development of community facilities should be in line with DM Policy Option 40 - Community Facilities.
- 3.10** The Council will continue to monitor vacancy rates in town centres and shopping parades as rises in vacancies can reflect economic uncertainties, can degrade the environment and may deter future investment. To avoid long term vacancies and in order to encourage new and innovative uses in town centres, the Council will, where appropriate, support temporary uses that provide active frontages at ground floor. Appropriate instances include where the overall appearance and vitality and viability of the town centre can benefit and a range of uses could include retail, galleries, music events, cultural displays and other uses which benefit the community.
- 3.11** Vacant and underused sites may be appropriate to use as temporary open space. This would provide the public with an additional recreational resource and contributes to the improved appearance and amenity of an area.

- 4.1** Following consultation on this document, the Council will prepare a draft version of the Development Management Local Plan. The draft plan will contain the policies the Council intends to take forward and adopt as well as addressing relevant consultation comments. At this stage there will be a further round of consultation and another chance to comment on the draft plan and policies being put forward. It is expected that this will take place in the summer of 2013.
- 4.2** In the meantime, please tell us what you think about the policy options and alternative options contained in this document. Anyone can comment but it must be in writing. Comments can be made in the following way.

Web

Please provide your comments on-line against the relevant sections of this document at the following address

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

OR

Post

Planning Policy, Planning Service

London Borough of Lewisham

Laurence House

1 Catford Road

Catford, SE6 4RU

OR

E-mail

planning.policy@lewisham.gov.uk

with 'Development Management Local Plan Further Options' as the subject.

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

Regeneration and growth areas

Core Strategy Objective 1: Physical and socio-economic benefits

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

Providing new homes

Core Strategy Objective 2: Housing provision and distribution

- 1.2 Provision will be made for the completion of an additional 18,165 net new dwellings from all sources between 2009/10 and 2025/26 to meet local housing need and accommodate the borough's share of London's housing needs. This aims to exceed the London Plan target for the borough.
- 1.3 Of these:
- 2,600 will be distributed within the Lewisham Town Centre
 - 1,750 will be distributed within the Catford Town Centre
 - 10,625 will be distributed within Deptford and New Cross
 - 3,190 will be distributed across the remainder of the borough.

Core Strategy Objective 3: Local housing need

- 1.4 Provision will be made to meet the housing needs of Lewisham's new and existing population, which will include:
- provision of affordable housing
 - a mix of dwelling sizes and types, including family housing
 - lifetime homes, and specific accommodation to meet the needs of an ageing population and those with special housing needs and
 - bringing vacant dwellings back into use.

Growing the local economy

Core Strategy Objective 4: Economic activity and local businesses

- 1.5 Investment in new and existing business and retail development will be facilitated to improve the physical environment for commercial enterprises, to result in a year on year sustainable increase in the size of the borough's economy through:
- protecting and developing a range of employment and training opportunities in the borough
 - retaining business and industrial land that contributes to the industrial and commercial functioning of London as a whole, and/or which supports the functioning of the local economy including premises for the creative industries, green industries, business services and other employment growth sectors
 - ensuring the future growth of the local economy by the mixed use redevelopment of identified industrial sites that require extensive physical investment and improvement

- d. developing Lewisham town centre to promote it to a Metropolitan town centre by 2026, and maintaining the status of Catford as a Major town centre, with a focus on quality design and development
- 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.

Environmental management

Core Strategy Objective 5: Climate change

- 1.6** 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.

Core Strategy Objective 6: Flood risk reduction and water management

- 1.7** The Council with its partners will take action to protect the borough from the risk of flooding and reduce the effects of flooding from all sources, including the Thames, Ravensbourne, Quaggy and Pool rivers, and manage improved water quality by:
- a. using the PPS25 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 and
 - d. requiring sustainable urban drainage systems in new development, wherever feasible.

Core Strategy Objective 7: Open spaces and environmental assets

- 1.8** The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by:
- a. protecting all open space including Metropolitan Open Land
 - b. protecting Sites of Importance for Nature Conservation 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 river and waterways network, and the Thames Path.

Core Strategy Objective 8: Waste management

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

Building a sustainable community**Core Strategy Objective 9: Transport and accessibility**

- 1.10** Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people's access needs while reducing the need to travel and reliance on the private car. This will:
- a. promote choice and better health
 - b. facilitate sustainable growth in the key localities for regeneration and growth (Lewisham, Catford, Deptford, New Cross)
 - c. improve integration, accessibility and connectivity within the borough and the London sub-region.
- 1.11** 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 town centres and public open space, including the Waterlink Way, and promotes the implementation of greenways
 - 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 Thameslink, the 'lower h' road at Lewisham, removal of the Kender gyratory system and safeguarding provision for the Surrey Canal station as part of the London Overground network.

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

- 1.12** Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets and their settings, local rivers and landscape, and 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 informed by an understanding of the historic context
 - b. ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment
 - c. preserving or enhancing the condition and historic significance of the borough's heritage assets and their settings and the other identified elements of the historic environment.

Core Strategy Objective 11: Community well-being

- 1.13** 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.

The following objectives were used in the Sustainability Appraisal to assess the development management options and alternatives.

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 opportunities for people to access 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 reduce land contamination and safeguard soil quality and quantity
12. To maintain and enhance landscapes and townscapes
13. To conserve and enhance heritage assets and use in the creation of sustainable places

Social

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

Table 1.1 illustrates how the objectives of the Sustainability Appraisal relate to the emerging DMLP objectives. The objectives are as follows:

1. To facilitate a positive and proactive approach to shaping, considering, determining and delivering development proposals to meet the Core Strategy's strategic objectives
2. To facilitate development which protects and enhances the amenity of the local area
3. To ensure a high standard of design
4. To create safe, attractive, accessible and functional environments for all
5. To secure development that helps create a more sustainable Lewisham.

Table 2.1 Compatibility of the Development Management Local Plan and Sustainability Appraisal objectives

| SA objectives | DMLP objectives | | | | |
|--|-----------------|---|---|---|---|
| | 1 | 2 | 3 | 4 | 5 |
| Economic | | | | | |
| 1. To encourage sustained economic growth across a variety of sectors | Y | | | | Y |
| 2. To encourage and promote employment and new enterprises in Lewisham | Y | | | | Y |
| Environmental | | | | | |
| 3. To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates | Y | | | | Y |
| 4. To use and manage the consumption of natural resources in a sustainable manner | Y | Y | | | Y |
| 5. To protect and enhance the borough's open spaces | Y | Y | Y | Y | Y |
| 6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the borough | Y | Y | Y | Y | Y |
| 7. To improve air quality and reduce noise and vibration | Y | Y | | | Y |
| 8. To reduce car travel and improve accessibility by sustainable modes of transport | Y | | | Y | Y |
| 9. To mitigate and adapt to the impact of climate change | Y | Y | | | Y |
| 10. To reduce and manage flood risk | Y | Y | | Y | Y |
| 11. To reduce land contamination and safeguard soil quality and quantity | Y | Y | Y | Y | Y |
| 12. To maintain and enhance landscapes and townscapes | Y | Y | Y | Y | Y |
| 13. To conserve and enhance heritage assets and utilise the heritage environment in the creation of sustainable places | Y | Y | Y | Y | Y |
| Social | | | | | |
| 14. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in decent home | Y | | | | Y |

| SA objectives | DMLP objectives | | | | |
|--|-----------------|---|---|---|---|
| | 1 | 2 | 3 | 4 | 5 |
| 15. To improve the health and well-being of the population and reduce health inequalities | Y | | | | Y |
| 16. To address deprivation, promote social inclusion and ensure equitable outcomes for all communities | Y | | | Y | Y |
| 17. To provide for the improvement of education, skills and training | Y | | | | Y |
| 18. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime | Y | Y | Y | Y | Y |
| 19. To improve accessibility to leisure and cultural facilities, community infrastructure and key local services | Y | | | | Y |

Source: Greater London Archaeological Service

APA1 Thames alluvial floodplain

The extensive peat and clay deposits across North Southwark and North Lewisham are up to 12m. thick and record the geological and environmental history of south-east England for the past 12,000 years. Environmental changes include the loss of the European land-bridge c. 7,000 BC and the clearance of the once extensive woodland. These deposits contain a range of prehistoric evidence including:

Upper Palaeolithic/early Mesolithic flint scatter sites; Late Mesolithic and early Neolithic flint scatter sites and remains of associated woodlands Middle and later Bronze Age sites, including the remains of tracks, timber platforms, 'camps', and vegetation clearance.

APA2 Thames and Ravensbourne terrace gravels

The terrace gravels fringing the Thames are commonly associated with evidence of successive prehistoric communities, including enclosed fields and open settlements.

APA3 Watling Street and the 'Deep-ford'

This road, probably first used in the 1st. century AD, is still in use as the A2 and has clearly influenced development along its route. The Roman road followed the southern limit of the local Thames gravel terrace and crossed the Ravensbourne via a ford. This may be the 'deep ford' from which the place name Deptford appears to be derived. A Roman settlement, possibly with Iron Age antecedents, was established close to this ford, on the banks of a creek which provided tidal wharfage. Mid-Saxon burials have also been found here, indicating the presence of a community which pre-dates the better known medieval village (see also APA 10 Deptford – The Broadway and Tanners Hill).

APA4 London-Lewes Road

The London-Lewes Road was part of the Roman arterial system, connected London with the South Coast and is possibly preserved in surviving public rights of way and street alignments. Otherwise this road is absent from the modern topography of Lewisham, despite its significant role as the boundary between the modern boroughs of Croydon and Bromley and the historic counties of Kent and Surrey.

APA5 Bell Green

A small Roman settlement adjoins the London-Lewes road close to the fording point across the River Pool.

APA 6 Lewisham and Catford/Rushey Green

Lewisham was the dominant manor estate, with sub-manors at Catford, Bellingham, Brockley, Sydenham, Shroffolds and Bankers. A common economic dependence on the water power of the Ravensbourne and close proximity of settlement eventually resulted in Lewisham and Catford merging to form a continuous ribbon of settlement.

Lewisham is named after the Anglo-Saxon 'Leofsa's settlement' whilst Catford is derived from 'the ford of the wild cats'. Its other local name of Rushey Green refers to the damp land adjacent to the Ravensbourne.

Late Saxon alien priory were unusual, yet by the 10th century a monastic cell existed at Lewisham, held by St. Peter's of Ghent as part of its main estate at Greenwich. The Domesday account of Lewisham, probably refers to the Priory's estate in both Greenwich and Lewisham, it is clear that the

waters of the Ravensbourne were already powering a number of mills. The early estate was probably located in the vicinity of the medieval parish church dedicated to St Mary (Listed Grade II*) on Lewisham High Street. During the 18th century Lewisham High Street was lined with fashionable houses of the merchant classes.

The location of the Domesday water-mills can today only be speculated on, but probably formed part of a dispersed agricultural community. It is possible that many were to continue in use until replaced during the medieval period or caught up in the rapid industrial growth of the 18th and 19th centuries. By this time the many mills operating between Lewisham and Catford, created a ribbon of settlement running north-south to the east of the Ravensbourne. The Riverdale Mill built c. 1828 on the site of an earlier 15th century corn mill survives as part of a recent office development. All other mills, such as the Armoury Mill, later known as the Silk Mill, which was producing small arms until 1818 and then spun silk and gold thread for the braid on military uniforms and ceremonial dress until 1937, have been demolished. A wide range of products were produced locally including steel tools, leather, mustard, as well as corn and flour.

APA 7 Deptford – the Strand, Sayes Court and the Royal Naval Dockyard

In the Domesday account for Deptford (Greenwich), the manor was owned by Gilbert de Magimot, who is said to have built a castle at Deptford. The 'stony foundations' recorded on Deptford Strand in the 17th century may have been part of this building. The manor passed to the de Sais family in the late 12th century, providing the alternative name of Sayes Court. A wooden medieval manor house was in existence by at least 1405 and rebuilt on the same site in 1568. Late in the 16th century the manor house was separated from the estates attached to it. The manor house passed by lease to the Evelyn family in the 17th century, whilst the land eventually passed to Henry VIII in 1535 and has been held by the Crown ever since.

The initial basis of the local economy was probably fishing, and there are 13th, 14th and 15th century references to fishermen and fisheries along the Strand shore, probably referring to inshore weirs or kiddels. However, shipbuilding is known to have begun in 1420 with the rebuilding and fitting of royal ships.

Henry VIII founded a Royal Dockyard for the construction of his ships around the nucleus of a storehouse for naval supplies that has been built in 1513, and which survived virtually complete until the Blitz of 1940-41. The remaining walls were demolished in 1953, and the undercrofts filled in with rubble. A plan of 1623, which was annotated by John Evelyn, provides a particularly informative view of the early dockyard and its relationship to St Nicholas Church and The Creek.

The Royal Naval Victualling Yard replaced the Red House stores on the north side of the Dockyard in 1742. The Dockyard was to expand throughout the 16th, 17th and 18th centuries, despite problems of silting on the Thames. Between 1830 and 1844 the Dockyard was used solely for ship-breaking. Shipbuilding was to return and despite proposals in the 1850s to extend further, the dockyard finally closed in 1869, although the Victualling Yard continued in use until 1961. Throughout this period state-sponsored ship building encouraged the nearby growth in private shipbuilding.

Apart from the construction of naval vessels, Francis Drake's The Golden Hind was dry-docked within the Dockyard on its return from circumnavigating the world in 1551. In 1698 Peter the Great, Czar of Russia was trained in shipbuilding and naval architecture at the Royal Dockyard whilst staying at Sayes Court. Captain Cook's two ships Resolution and Adventure were equipped for his second voyage to the Pacific in 1772-1775, Resolution being again equipped, together with Discovery for his last voyage in 1776-1779.

The site of the Royal Naval Dockyard, now known as Convoy's Wharf, is today a large wharf with warehouse facilities owned by News International Ltd. Extant remains of the Dockyard include the shed constructed c. 1846/47 to cover Nos. 2 and 3 slipways (Listed Grade II), the early 18th century

Master Shipwrights Apartment (Listed Grade II) erected in 1700, river walls which show the location of the entrances to the slips and docks and the timber slipways exposed on the foreshore. However, by far the greater part of the Dockyard survives as buried archaeological structures.

The lease on Sayes Court manor house descended by inheritance to John Evelyn in 1652. Evelyn developed his practical and horticultural skills through the design and construction of extensive gardens at Sayes Court, which are shown in a surviving plan of 1653. Evelyn, inspired by his earlier tour of gardens in Italy, France and Germany, drew on the experience and innovations developed at Sayes Court in his many influential publications on gardening and horticulture, including *Sylva*, or a discourse of Forest Trees, in which he refers specifically to planting trials at Sayes Court. The manor house was taken over as the parish workhouse in 1729 and then substantially altered in 1759, perhaps retaining some of the original structure. It was finally demolished c. 1930. Part of the Sayes Court Gardens now lies within a public park, and recent archaeological investigations reveal that evidence of Evelyn's ponds survives on adjoining properties.

APA8 Deptford Creek

The mid to late Saxon settlement and medieval village of Deptford Green, St Nicholas church, the site of the East India Company Dockyard and Sebastian Ferranti's Power Station, were all located adjacent to the creek mouth, historically formed one of the two early Deptford settlements, but are now part of the modern Borough of Greenwich. The western bank of the Creek within Lewisham is associated with archaeological remains which detail the history of flood defence, water supply and secondary riverside industries. The earliest developments include the tide mill north of Deptford Bridge, which is known to have been operating from at least the 12th century. The King's Slaughterhouse was built by the first half of the 16th century. Other industries moved in to the area including the 17th century copperworks and a variety of local 18th century potteries, pipe clay factories and tanneries. From the late 18th century the Deptford Creekside area was known as the 'City', representing a local cultural subdivision, socially separate from the rest of Deptford and subject to its own rules and customs.

The archaeological evidence for this APA includes buried evidence, but also the extant river wall. Surviving wooden walls have inherent historic interests, but are also particularly fragile habitats which support the ecology of the urban post-industrial creek, which makes a special contribution to local bio-diversity.

APA 9 Upper Deptford

By the late 17th century John Evelyn was building houses on land on the west side of Butt Lane, which later became Deptford High Street. These were required to meet the demand for housing as the local population increased with the expanding Dockyard. This population pressure played a significant part in the division of Deptford into two parishes. The southern part became a new parish with a new church, the Baroque Church of St. Paul (Listed Grade I), which was erected in 1713-30 along with an extraordinary rectory which was triangular with octagonal rooms and turrets at each corner. The main period of growth in housing occurred in the years 1650-1730, with a further boom in 1770-1800. Consequently Butt Lane and streets such as Albury Street (Listed Grade II*) were developed to provide housing for dockyard artisans and tradesmen.

A recent RCHME survey has assessed the survival and character of pre-1800 houses. A type of urban vernacular housing, in which timber framed construction methods were employed later than is common, has been found to survive extensively within the area of Deptford High Street, with other examples occurring along Deptford Broadway and Tanners Hill. The design of these buildings provides significant evidence of the social development of Georgian London, which has implications for towns in England and in North America. In addition to the extant historic fabric of the buildings, excavation has revealed the survival of associated pits and wells to the rear of the properties and it has been found that cellars may survive even when all trace of the superstructure has been lost.

APA 10 Deptford – the Broadway and Tanners Hill

The early history of the creekhead settlement adjoining the Watling Street ford (APA3) persists into the early medieval period. Excavations on the site of the former Dover Castle public house produced evidence of dense and continuous settlement from at least the Norman conquest. The settlement at the Broadway operated independently to that at Deptford Green, which adjoined St. Nicholas Church. It's physical independence was sustained until the 18th century, when the southward expansion of housing along Butt Lane eventually reached the Broadway, which then became subject to the changes described in APA 9. Upper Deptford, Brook Mill, mentioned in the deeds of 1588, used from 1701 to pipe water from the Ravensbourne to the manors of Sayes Court and East Greenwich, was the precursor to what was known successively as the Ravensbourne Water Works and the Kent Waterworks Company, before the formation of the Metropolitan Water Board in 1903. On the south side of Watling Street, houses are known to occupy the junction with Brookmill Road in the second half of the 14th century. The area around Tanners Hill was the location for early industry, including 18th century potteries.

The longevity of settlement in this location is unique within Lewisham. The archaeological record includes not only the buried remains, but also the extant built fabric of the early surviving houses.

APA 11 Lee

The Lee place-name is associated with former woodland or a woodland clearance. Of the three principal manors, Lee retained its rural character until the encroachment of 19th century sub-urbanism and was a popular rural location for 18th century City business men. The ruined 15th century ragstone tower (Listed Grade II) of the medieval parish church of St Margaret survives in the old burial ground. The early moated manor house, latterly known as Annesley's House was located some distance away to the north of the High Road. The remains of medieval tenements are likely to occur along Old Road and along the line of Brandram Road, which linked the church to the manor house. Fragmentation of Annesley's House estate provided land for 17th and 18th century houses. Lee Place, which was built in the early 17th century and demolished in 1825, was the home of Christopher Boone, a London merchant who established the Almshouse and Chapel (Listed Grade I) on the High Road, which bears his name. Pentland House (Listed Grade II) was built in 1661, on what was previously part of the Lee Place estate. The Manor House built in 1771 is further considered in APA 19.

APA 12 Sydenham

The name is possibly derived from the Anglo-Saxon 'Cippas' settlement' was a sub-manor of Lewisham and adjoined the former Great North Wood. Evidence of early tenements can be anticipated.

APA 13 Southend

Southend takes its name from its position at the south end of the parish. The small agricultural community appears to have always focussed on the Lower and Upper Mills on the Ravensbourne. There is probably good potential for the survival of early mill structures and associated tenements can also be anticipated.

APA 14 New Cross

The name is derived from the sign of the Golden Cross carried by a well-known medieval coaching house on Watling Street. Recent excavation on New Cross Road has also revealed that sometime after purchasing the manor estate in 1614, the Haberdashers Company established a brickworks, possibly supplying the demand which followed the Fire of London. Counter Hill House built in the 18th century was a boarding school between 1792 and 1837 before making way for Goldsmiths College (Listed Grade II). The site of the Cromacks nursery is evidence of the importance of local market gardens which supplied expanding populations of Deptford and Southwark during the 18th century.

APA 15 Perry Street

The medieval manor house of Sydenham Place, later known as Place House adjoined a small hamlet known as Perry Street which was located along the London-Lewes Road. This small settlement persisted into the 17th and 18th century, before succumbing to suburban estates. Evidence of the medieval manor house and tenements may survive beneath recent housing development.

APA 16 Brockley Jack

The site of a 15th century roadside inn located along the road originally built by the Romans. Since demolition, only buried evidence is likely to survive.

APA 17 Brockley Priory

Briefly the site of a Pre-monstratensian abbey which was founded in 1182, but moved to Bayham, Hampshire in 1199-1208. Excavation has revealed part of the refectory and artefacts of 14th to 18th century dates. This suggests a later use of the abbey buildings and further potential for archaeological evidence.

APA 18 Blackheath and Blackheath Village

Blackheath, which is divided by Watling Street, is a traditional place of assembly, the scene of medieval and Tudor pageantry, violent confrontation and dissent. The nature of assembly changed in accordance with prevailing society. In 1381 Wat Tyler assembled his peasants here, and it was here Henry VII defeated the Cornish rebels in 1497. By the 18th century Non-Conformist religious meetings addressed by Wesley occurred on the Heath, which by now also provided a setting to the elegant houses built for the Georgian upper middle classes. The early examples form a haphazard group. They include Percival and Spencer Houses (Listed Grade II*) on the west side of the Heath built in 1689 and terminating at the east side with the Paragon built in 1794. Blackheath Village was a speculative development which started in the 18th century on the site of a small hamlet known as Dowager's Bottom.

Apart from the built heritage, there is considerable potential for buried, albeit ephemeral evidence of the various assemblies that have taken place over the centuries.

APA 19 The Manor House, Lee

The Manor House (Listed Grade II*) was built in 1771 and owned by the Baring banking family between 1796 and 1901. The layout of the gardens (Registered Grade II) is essentially 18th/19th century with a winding path surrounding a sweeping central lawn and descending to an artificial pond. A late 18th century ice house also survives beneath the western boundary.

APA 20 Beckenham Place Park

Beckenham Place (Listed Grade II*) was built by John Cator c.1773 close to the site of a much earlier manor house. The 18th century mansion was set in parklands, and both survive as a historic entity, although the public golf course intrudes on the historic character and the lake is now little more than a damp depression. Furthermore, there survives evidence of an earlier agricultural landscape from which the 18th century parkland was conceived. Numerous extant features can be identified including field boundaries, wood banks, semi-natural woodland, coppiced and pollarded standards as well as areas of ridge and furrow.

APA 21 Wells Park

A small survival of the once extensive Sydenham Common. Mineral springs were discovered at the site of Wells Park in c. 1640 and Sydenham became a minor spa which declined in the early 19th century.

Lewisham UDP policies superceeded policies

| UDP policy | Policy name | Proposed replacement DM Policy Option (or London Plan Policy, NPPF reference) |
|------------|--|--|
| STR URB 1 | The built environment | NPPF Section 7, LP Policy 7.1 - 3, CS Policy 15 |
| STR URB 4 | Environment in regeneration areas | CS Policies 8, 9, 10, 11, 12 |
| URB1 | Development sites and key development sites | DM Option 29 |
| URB3 | Urban design | DM Option 29 |
| URB6 | Alterations and extensions | DM Option 30 |
| URB8 | Shopfronts | DM Option 18 |
| URB9 | Signs and hoardings | DM Option 18 |
| URB10 | Roller grilles and shutters | DM Option 18 |
| URB11 | Masts, satellite dishes and telecommunications equipment | DM Option 36 |
| URB12 | Landscape and development | DM Option 24 |
| URB13 | Trees | DM Option 24 |
| URB14 | Street furniture and paving | DM Option 34 |
| URB16 | New development, changes of use and alterations to buildings in conversion areas | DM Option 36 |
| URB20 | Locally listed buildings | DM Option 36 |
| URB24 | Thames Policy Area | DM Option 33 |
| URB29 | Art in public spaces | DM Option 34 |
| OS2 | Land close to Metropolitan Open Land | CS Policies 12, 18, LP Policy 7.17 |
| OS7 | Other open space | CS Policy 12, LP Policy 7.18, NPPF Paragraph 74 |
| OS9 | Temporary open space | Deleted (Info in DM Implementation Chapter) |
| OS15 | Historic Parks, Gardens and Landscapes | DM Option 35 |
| OS16 | World Heritage Buffer Zone | DM Option 35 |
| ENV.PRO2 | Special waste and hazardous substances | CS Policy 3, Environmental Permitting (England and Wales) Regulations 2010 |
| ENV.PRO5 | Waste management facilities | CS Policy 3 |
| ENV.PRO9 | Potentially polluting uses | NPPF Paragraph 120 |
| ENV.PRO10 | Contaminated land | DM Option 27 |
| ENV.PRO11 | Noise generating development | DM Option 25 |
| ENV.PRO12 | Light generating development | DM Option 26 |

| UDP policy | Policy name | Proposed replacement DM Policy Option (or London Plan Policy, NPPF reference) |
|------------|--|---|
| ENV.PRO17 | Management of the water supply | CS Policies 8, 10 and implementation of Sustainable Urban Drainage Systems and Surface Water Management Plans |
| HSG1 | Prevention of loss of housing | DM Option 2 |
| HSG4 | Residential amenity | DM Option 29 |
| HSG5 | Layout and design of new residential development | DM Option 31 |
| HSG7 | Gardens | DM Option 29, 30, 31, 32 |
| HSG8 | Backland and In-fill development | DM Option 32 |
| HSG9 | Conversion of residential property | DM Option 3 |
| HSG10 | Conversion of office and other commercial space to residential accommodation | DM Option 3 |
| HSG11 | Conversion of space above shops to residential accommodation | DM Option 3 |
| HSG12 | Residential extensions | DM Option 30 |
| HSG18 | Special needs housing | DM Option 4 |
| TRN24 | Off-street parking for residential conversions | DM Option 28 |
| TRN27 | Dual use of private car parks | Deleted (replaced for Lewisham town centre in LTCLP Policy 20) |
| TRN28 | Motorcycle parking | DM Option 28 |
| STC1 | The shopping hierarchy | CS Policy 6 |
| STC2 | Location of new stores (the Sequential Test) | DM Option 12 |
| STC4 | Major and District Centres - core shopping areas | DM Option 13 |
| STC5 | Major and District Centres - non core shopping areas | DM Option 13 |
| STC6 | Major and District Centres - core shopping areas | DM Option 13 |
| STC7 | Local shopping areas | DM Option 14 |
| STC8 | Local shopping parades and corner shops | DM Option 15 |
| STC9 | Restaurants, A3 uses and take away hot food shops | DM Option 16, 17 |
| STC10 | Mini cab or taxi offices | DM Option 20 |

| UDP policy | Policy name | Proposed replacement DM Policy Option (or London Plan Policy, NPPF reference) |
|------------|--|--|
| STC12 | Mixed use development | DM Option 11 |
| LCE1 | Location of new and improved leisure, community and education facilities | DM Option 25, CS Policy 19 and LP Policy 3.16 |
| LCE2 | Existing leisure and community facilities | CS Policy 19, LP Policy 3.16 and NPPF Paragraph 74 |
| LCE3 | Educational sites and playing fields | Site Allocations Local Plan, LP Policies 3.16, 3.19 and NPPF Paragraph 74 |
| LCE6 | Artificial grass pitches | DM Option 23 |
| LCE8 | Public conveniences | DM Option 37 |

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

- Social rented housing is owned by local authorities and private registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Community Agency.
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.
- Affordable Rent is subject to rent controls that require a centre of no more than 80% of the local market rent (including service charges, where applicable).
- Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

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

Air Quality Impact Assessment (AQIA) A technique for determining the relative contribution to ground level pollutant concentrations as a result of existing and/or future emission sources. The AQIA report enables the planning authority to determine, with a reasonable degree of certainty, the significance of any air quality impacts, and thereby the priority to be given to air quality concerns when deciding an application. The scope of an air quality assessment will depend on the nature of the proposed development and the potential impact, but is likely to include:

- the existing air quality in the study area (baseline)
- predicted future air quality without the development (future baseline)
- predicted future air quality with the development (with development)
- assessment of the impact of the construction / demolition phase
- consideration of the cumulative impact of permitted developments within the area.

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

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

Annual Monitoring Report A report produced by the Local Authority to assess progress with and the effectiveness of the Local Development Framework.

Arboricultural Survey A required planning application validation report, where appropriate, detailing and assessing the trees on site. This should comply with the British Standard of BS5837.

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

Archaeological Interest There will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

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

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

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

Building Research Establishment Environmental Assessment Method (BREEAM) A national environmental assessment and rating system for buildings. It is the most widely used environmental standard in the UK, used to assess those buildings and extensions to buildings that are not rated by the Code for Sustainable Homes.

Care Homes Housing generally catering for older people, those less mobile or wheelchair users. Schemes may have their own care staff, and will usually provide one or more meals each day, if required. Bathrooms will be designed to make it easier for assistance to be offered.

Code for Sustainable Homes A national standard for sustainable design and construction of new homes which will be mandatory from 1 May 2008. The Code measures the sustainability of a new home against categories of sustainable design, using a 1 to 6 rating system to communicate the overall sustainability performance of a new home. The Code sets minimum standards for energy and water use at each level. Go to <http://www.communities.gov.uk/thecode> to find out more.

Community Infrastructure Levy (CIL) A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

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

Conservation (for heritage policy) The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

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

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

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

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

Department for Communities and Local Government (DCLG) The government department responsible for setting UK policy on local government, housing, urban regeneration, planning and fire and rescue.

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

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

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

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

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

Equality Analysis Assessment (EAA) Equality Analysis Assessments are concerned with anticipating and identifying the equality consequences of particular policy initiatives and service delivery and ensuring that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures.

Evidence Base The data and information about the current state of Lewisham used to inform the preparation of Local Plan documents.

Flood Risk Assessment An assessment of the likelihood of flooding in a particular area (usually a specific site) so that development needs and mitigation measures can be carefully considered.

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

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

Houses in Multiple Occupation (HMO) Residential property that takes the form of shared houses, flats and non-self contained dwellings let to three or more unrelated tenants who form two or more households and share a kitchen, bathroom or toilet. Households are families, including single persons and co-habiting couples (whether or not of opposite sex).

Housing Need A level of socially desirable housing, the demand for which is not reflected in the open market, normally due to a lack of income in relation to prevailing house prices or rents. It can therefore usually only be met through an element of subsidy.

Independent Examination The process by which a planning inspector may publicly examine a DPD before issuing a report with recommendations that should be made prior to adoption of the DPD.

Infill Development Development that generally takes place on sites within street frontages such as former builders yards, small workshops and garages, gaps in terraces and gardens to the side of houses.

Infrastructure The utilities, transport and other communication facilities and community facilities required to support housing, industrial and commercial activity, schools, shopping centres and other community and public transport services.

Issues and Options, Preferred Options and Further Options The 'pre-submission' consultation stages on Development Plan Documents with the objective of gaining public consensus on proposals ahead of submission to Government for independent examination.

Land Contamination Assessment A study of the level of contamination of the land on a development site, including, as appropriate, initial risk assessment, site investigation, remediation strategy and a verification plan and report.

Landscape Management Plan A plan or document that details how and when the implemented landscape plan will be maintained in the future, ensuring the development remains sustainable.

Landscape Plan A plan or document outlining the extent, type and location of proposed landscaping and planting.

Landscape Scheme A set of plans to ensure the delivery and ongoing maintenance of landscaping on a development site, including at least a Landscape Plan, delivery information and a Landscape Management Plan.

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

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

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

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

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

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

Local Shopping Parade and Corner Shop A local shopping parade is a group of at least four contiguous shops. A corner shop is a shop which is located outside of the Major centres, District centres, Neighbourhood Local centres and Local Shopping Parades. These parades and shops should be provided for the day to day needs of local residents. In the London Borough of Lewisham there are over 80 local shopping parades.

Local Strategic Partnership A Local Strategic Partnership is a single non-statutory, multi-agency body which matches local authority boundaries and aims to bring together at a local level the different parts of the public, private, community and voluntary sectors.

Localism Act 2012 National legislation from central government, partly aimed at improving the planning process and enhancing community involvement in it. Visit www.communities.gov.uk to find out more.

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

Metropolitan Open Land (MOL) Strategic open land within the urban area that contributes to the structure of London.

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

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

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

Neighbourhood Local Centre A centre that serves a localised catchment often most accessible by walking and cycling and typically contains mostly convenience goods and other services. In the London Borough of Lewisham these are Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way.

Noise and Vibration Assessment An assessment of noise and vibration that is either existing and may impact upon future development, or that would be caused by new development and could impact upon the existing environment.

Open space All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Out of Centre A location which is not in or on the edge of a centre but not necessarily outside the urban area.

Passive Design Design that does not require mechanical heating or cooling. Homes that are passively designed take advantage of natural climate to maintain thermal comfort.

Planning and Compulsory Purchase Act 2004 National planning legislation from central government aimed at improving the planning process and enhancing community involvement in it. Visit www.communities.gov.uk to find out more.

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

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

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

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

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

Retail Hierarchy The role and relationship of retail centres across the borough. Lewisham's retail hierarchy is set out in Core Strategy Policy 6.

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

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

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

Sheltered Housing Sheltered housing covers a wide range of rented housing for older and/or disabled or other vulnerable people. Most commonly it refers to grouped housing of flats or bungalows with a manager or 'officer' who may live on-site. With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are usually some common facilities that all residents can use - such as a residents' lounge, a guest suite, a garden and often a laundry.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Spatial Planning Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function. They will include policies which can impact on land use, for example by influencing the demands on, or need for, development, but which are not capable of being delivered solely or mainly through the granting or refusal of planning permission and which may be implemented by other means.

Stakeholder A person, group, company, association, etc. with an economic, professional or community interest in the borough or a specific part of it, or that is affected by local developments.

Statement of Community Involvement (SCI) The Statement of Community Involvement sets out the local planning authority's policy for involving the community in the preparation and revision of Local Development Documents and planning applications.

Strategic Environmental Appraisal (SEA) A term used internationally to describe environmental assessment as applied to policies, plans and programmes.

Strategic Flood Risk Assessment (SFRA) An assessment usually undertaken by a Local Authority at a borough-wide level that considers flood risk, both fluvial and tidal and examines the risks involved for developing certain areas within the borough in accordance with the NPPF. The Lewisham SFRA was produced by Jacobs and published in July 2008. Areas/sites are categorised as falling within one or more of the following flood zones:

Flood Zone 1 Low probability of flooding. Defined as land outside flood zone 2 and having less than 1 in 1000 annual probability of river or sea flooding in any year (<0.1%)

Flood Zone 2 Medium probability of flooding. Defined as land having between 1 in 100 and 1 in 1000 annual probability of river flooding (1% - 0.1%) or between a 1 in 200 and 1 in 1000 annual probability of sea flooding (0.5% - 0.1%) in any year

Flood Zone 3a High probability of flooding. Defined as land having 1 in 100 or greater annual probability of river flooding

Flood Zone 3b Land where water has to flow or be stored in times of flood. Defined as land having a 1 in 20 (5%) or greater annual probability of flooding in any year; or is designed to flood in an extreme (0.1%) flood, or at another probability to be agreed between the local authority and the Environment Agency.

Strategic Housing Land Availability Assessment (SHLAA) A study aimed at identifying sites with potential for housing, assessing their housing potential and assessing when they are likely to be developed.

Strategic Housing Market Assessment (SHMA) A study aimed at assessing the need and demand for housing within a housing market area.

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

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

Sustainable Community Strategy (SCS) The Sustainable Community Strategy has been prepared by Lewisham's Local Strategic Partnership and is a document which sets out how the vision and priorities for Lewisham will be achieved. The Core Strategy is the spatial interpretation of the SCS.

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

Sustainable Urban Drainage Systems (SUDS) Physical structures designed to receive surface water runoff in order to reduce the negative impact of development on the water environment. They can usually be incorporated into the planted or paved area of the development.

Tranquil Open Space Areas of open space which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Tree Preservation Order A Tree Preservation Order may be made to protect individual trees or groups of trees. The Order gives protection against unauthorised felling, lopping, or other tree works.

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

