

LOCAL DEVELOPMENT FRAMEWORK

Development Polices & Site Allocations

THE PREFERRED OPTIONS REPORT

May 2007

IMPORTANT INFORMATION

WHAT IS THIS REPORT?

This is the Preferred Options Report for the Council's Development Polices and Site Allocations Development Plan Document (DPD). It contains policies that will be used to assess planning applications for new development and change of use. It also contains policies for specific sites and designates certain land for a specific land use e.g. housing, employment etc.

The report provides the detailed planning policies and builds on the Council's vision, spatial strategy and core policies contained in the document called People, Places and Spaces, the LDFs Spatial (Core) Strategy. At this stage the policies represent the Council's preferred approach it is considering adopting.

WHY HAS IT BEEN PREPARED?

New planning legislation required the Council to produce a new set of planning policy documents. Collectively these documents are known as the Local Development Framework or LDF. This document is part of the LDF.

WHAT HAS PREVIOUSLY BEEN DONE?

The preferred options reflect the findings from the Issues and Options consultation in 2005. This provided the issues, ideas and possible directions for the types of policies and proposals that could apply to development in Lewisham.

WHO CAN COMMENT ON THE REPORT?

Everyone can comment. Copies of the report are available from:

- The Councils website (www.lewisham.gov.uk)
- The Planning Service
 London Borough of Lewisham
 5th Floor, Laurence House
 1 Catford Road
 Catford, SE6 4RU
- All borough libraries

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

HOW CAN I COMMENT?

We need your feedback on what you think of the preferred options presented in this report.

- We want to know what you think?
- Can improvements be made?
- What do you think of the draft policies?

Comments must be in writing and sent to:

- Planning Policy
 London Borough of Lewisham
 5th Floor, Laurence House
 1 Catford Road, Catford, SE6 4RU; or
- E-mail your comments to: <u>planning@lewisham.gov.uk</u> with 'LDF Development Policies & Site Allocations Preferred Options' as the subject.

The consultation period for the Preferred Options Report ends on Friday 3rd August 2007. It is important that all comments are received by this date. This is to ensure the Council has plenty of time to consider what everyone has said and to move forward to the next stage.

WHAT HAPPENS NEXT?

Once the Council has reviewed what the community and stakeholders have said, we will prepare a final draft document. This will then be submitted to the Secretary of State and be subject to an independent review at an Examination in Public, before it can be adopted by the Council.

PLEASE REMEMBER – ALL COMMENTS AND RESPONSES SHOULD BE RECEIVED BY THE COUNCIL NO LATER THAN 5PM ON: FRIDAY 3rd AUGUST 2007

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1. INTRODUCTION

1.1. WHAT IS THE DEVELOPMENT POLICIES AND SITE ALLOCATIONS DOCUMENT?

The Government has introduced a new planning system. Councils now have to produce a Local Development Framework or LDF. This is a collection of documents setting out the Council's planning policies and strategies. You can see a list of all the plans the Council intends to produce in another document named, the Local Development Scheme, which can be viewed on the Council's website.

This particular document is the Preferred Options report for Council's emerging Development Policies and Site Allocations Development Plan Document (DPD) and is structured in two parts:

- The development policies provide a set of criteria based policies by which planning applications for new development and change of use will be judged. These policies implement the Core Policies of the LDFs Spatial (Core) Strategy to ensure all proposed development accords with the spatial vision, objectives and strategy for the Borough.
- The **site allocations** identify and designate land for a particular proposal (such as housing, retail, employment, mixed use etc) to ensure sufficient land is available to meet the land use needs in line with the spatial vision, objectives and strategy for the Borough as set out in the Spatial (Core) Strategy.

The report sets out the preferred approach the Council is considering adopting. The draft development policies include criteria that will be taken into consideration by the Council when determining planning applications throughout the Borough. When the Council makes planning application decisions, it will assess and apply the relevant policies in their entirety to the proposal and not just individual policies. In other words, all the policies are inter dependent of each other and should be read in tandem with the policies in the Core Strategy.

Where there are proposals for sites where no specific policy applies, planning applications will be assessed on their individual merits against the spatial objectives of the Core Strategy.

All site specific allocations are set out in this document, except for those set out in Area Action Plans. All preferred options and draft policies should be read in conjunction with the spatial vision, objectives, strategy and core policies detailed in the emerging Spatial (Core) Strategy DPD.

The draft development policies are generally criteria based and focus on issues such as protecting residential amenity; ensuring adequate provision of housing; protection of the landscape and natural resources; nature conservation; addressing highway and transport issues; protecting the viability and vitality of town centres; and addressing visual impact issues.

This document must be prepared in accordance with government legislation and guidance. Primarily this is set out in the Planning and Compulsory Purchase Act (2004). It must

therefore, take full account of national planning policy guidance and be in general conformity with the regional spatial strategy for London known as the London Plan. The document also undergoes a set of community consultations to involve and take into consideration the wider community in the preparation of the plan.

1.2 PREPARATION OF THE DEVELOPMENT POLICIES AND SITE ALLOCATIONS DOCUMENT

1.2.1 What consultation has already taken place?

The Development Policies and Site Allocations document is known as a Development Plan Document (DPD) in the LDF. The production of a DPD goes through a number of stages and must be in accordance with a document called the Statement of Community Involvement or SCI.

In preparing the relevant documents for the LDF, a scoping report was released for consultation in May 2005, which gauged initial feedback on a range of matters affecting the Borough such as housing, transport, employment and other like. Following on from this, the Council consulted on 12 issues and options papers covering the following topics:

- Housing
- Waste
- Urban Design and Conservation
- Sustainable Environment
- Open Space
- Transport and parking
- Economy and employment
- Retail and town centres
- Education, health and community facilities
- Site allocations
- Lewisham Town Centre Area Action Plan
- Catford Town Centre Area Action Plan

Separate Consultation Reports summarise the responses received and indicates how each response was dealt with. A copy is available from the Planning Service or to download and view from the Council's website at:

 $\underline{\text{http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFrame}} \underline{\text{work/}} \ .$

1.2.2 What is this current consultation about?

This current consultation presents the preferred options for the range of issues to be covered by the draft Development Polices and Site Allocations DPD. The preferred options have been prepared having regard to:

- National and regional policy and guidance
- Feedback from the issues and options consultation
- Changes that may have been made to Government guidance and planning legislation
- The initial and final Sustainability Appraisal of the issues and options and the Preferred Options Sustainability Appraisal and
- Other Council documents

In some cases the preferred option has been devised from a combination of the range of options presented at the issues and options stage rather than just one discreet option. The process is broadly illustrated below and highlights the preferred options.

Scoping	Issues &	Preferred Options	Submission	Examination	Adoption
Report	Options			in Public	

The Council is looking to you, the community and stakeholders, to tell us the following:

- What do you think of the preferred options presented?
- Can improvements be made to the preferred option?
- What do you think of the drafted policy provided?

In some cases the preferred option has been devised from a combination of the range of options presented at the issues and options stage rather than just one discreet option.

1.2.3 What will happen next?

After the preferred options consultation, the document will be redrafted taking into account the consultation comments and any changes to Government policy. It will then be subject to a further sustainability appraisal and a Submission Development Polices and Site Allocations DPD will be published. As the name implies this document will be submitted to the Secretary of State for an independent examination presided over by a Planning Inspector.

The public and other stakeholders will again have the opportunity to make representations on the submitted document, however, all comments will be submitted to the Secretary of State. The Planning Inspector will make a decision based on each representation received. The Inspectors report on the submitted plan will be binding on the Council and any changes recommended in the report must be made before the document is adopted by the Council.

For full details in the consultation process see the Statement of Community Involvement (SCI) which can be obtained from our website or free of charge from the Lewisham Planning Service.

1.3 STRUCTURE OF THIS DOCUMENT

The Development Policies and Site Allocations DPD are presented in two parts. Part One comprises the Development Policies and Part Two focuses on Site Allocations.

This Preferred Options Report (Part One) is structured as follows:

- **Section 1: Introduction** explains the role and purpose of the document and the role of the community and stakeholders.
- Section 2: Planning Process explains the document's relationship to national and regional policy, other LDF documents, other Council studies and documents, and the sustainability appraisal of the preferred options.
- Section 3: Development Policies sets out the preferred options and draft development policies grouped into themes such as housing, transport, design and open space. Each is presented and discussed in terms of the options consulted in the Issues and Options report, the preferred option, the draft policy or policies and the reasons and justification for the preferred approach. The development policies

provide the detailed implementation of the over arching core policies, contained in the LDFs Spatial (Core) Strategy.

- Section 4: Site Allocations allocates certain land for a specific use and provides a broad development framework for each site.
- Section 5: Monitoring and Implementation outlines the proposed strategy to
 ensure implementation and delivery of the development policies, and how these will
 be monitored.
- Appendices provide additional material including further explanation of national and regional policy, relationship of the strategy to the Community Strategy and a glossary.

2. PLANNING PROCESS

2.1 THE NEW PLANNING SYSTEM

Applications for development in Lewisham are currently considered in relation to the policies set out in the Lewisham Unitary Development Plan (adopted July 2004) which regulates all development in the Borough. The current Unitary Development Plan expires in September 2007, therefore the Council will seek to save a number of policies for a further period of three years until the full adoption of the Local Development Framework. The Planning and Compulsory Purchase Act (2004) introduced a new system of plan making in England called the Local Development Framework or LDF. This is radically different from the previous system and has an emphasis on pursuing a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well being, in ways that protect and enhance the physical environment and optimise resource and energy use.¹

The Local Development Framework is a portfolio of planning documents, prepared by the Council, which collectively will deliver the planning strategy for Lewisham. A glossary of all the new planning jargon is set out in Appendix 1. The documents which will comprise the Lewisham LDF are:

- Local Development Scheme (LDS)
- Development Plan Documents (DPDs), which will include the following documents:
 - Spatial (Core) Strategy
 - o Development Policies and Site Allocations
 - o Area Action Plans (AAPs) for Lewisham and Catford
 - The Proposals Map
- Supplementary Planning Documents (SPDs)
- Statement of Community Involvement (SCI)
- Annual Monitoring Report (AMR)
- Sustainability Appraisal/SEA directive.

The Local Development Scheme is essentially the work programme for the production of the various documents that make up the LDF. It sets out the name of each document, its purpose and the timetable for its production including the dates of various key milestones.

The Spatial (Core) Strategy is one of four Development Plan Documents (DPD) the Council is preparing. It is the most strategic of the DPDs and sets out the spatial vision and policies for the borough as a whole and its localities. However, it does not identify specific sites. All the other DPDs must be consistent with the strategy and policies set out in the Spatial (Core) Strategy.

The Development Policies and Site Allocations DPD is the document that will set out the main policies that will be used to consider planning applications for development or change of use. This document will contain the more detailed criteria based policies relating to issues such as housing, shops, the design of buildings and car parking. The site allocations part of the document will determine the future land-use of specific sites.

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¹ CLG, Planning Policy Statement 1, 2005

The two Area Action Plan DPDs (Lewisham and Catford Town Centres) will provide the planning framework for the two town centres as they are likely to be subject to significant change in the next few years. The purpose of an area action plan is:

- To deliver planned growth
- Stimulate regeneration
- Protect Conservation Areas and
- Focus the delivery of area based regeneration initiatives.

Each of the DPDs has a different but complementary role and together they will provide the comprehensive planning policy framework for Lewisham.

2.2 A FLEXIBLE PLAN

The preparation of the Development Plan Document spans a number of years and flexibility is necessary in order to incorporate changes arising from other plans and strategies that may have an impact on the LDF. An example would be the NHS Trust who will have a more direct impact on health matters than the Council. The Trust's plans and strategies may change over the lifetime of this plan and it is therefore important that there is sufficient flexibility to adapt to new circumstances as they arise.

The Mayor of London is currently consulting on further alterations to the London Plan which includes changes that will have an impact on Lewisham's LDF. The spatial strategy has been prepared in light of the current London Plan though the Council acknowledges that should the draft alterations be adopted, then the strategy will respond to the adopted document.

2.3 RELATIONSHIP TO OTHER PLANS AND STRATEGIES

The preferred options for this DPD have taken into account a range of other plans, strategies and documents at the national, regional and local level and reflect the range of objectives, policies and guidance these documents contain. A summary is provided below.

2.3.1 National Planning Policy

Each Lewisham Development Plan Document (DPD) has taken into account national planning policy in formulating the local strategy and policies. The Government has published a number of Planning Policy Statements (PPS) to replace Planning Policy Guidance notes (PPG) which set out the national policies and principles on different aspects of planning. The hierarchy of planning policy is such that the policies set out at the national level must be taken into account by both the regional planning authority (Mayor of London) and the local planning authority when preparing their various LDF documents (see Appendix 2 for a list of national policy documents).

2.3.2 Regional Planning Policy

London Plan

The Planning and Compulsory Purchase Act (2004) requires the Spatial (Core) Strategy to be in general conformity with the London Plan, that is, the Mayor of London's spatial strategy for Greater London. The London Plan sets out six objectives, which are:

- To accommodate London's growth within its boundaries without encroaching on open space
- To make London a better city for people to live in

- To make London a more prosperous city with strong and diverse economic growth
- To promote social inclusion and tackle deprivation and discrimination
- To improve London's accessibility
- To make London a more attractive, well designed and green city.

A summary of the London Plan is provided in Appendix 2. The preferred options for the Development Policies and Site Allocations DPD reflect these objectives and in the Council's opinion is in 'general conformity' with London Plan.

2.3.3 Economic Development

The Economic Development Strategy (EDS) produced by the London Development Agency, is the mechanism through which, the Mayor of London will deliver the vision of economic development and growth in London. The preferred options for the Development Policies and Site Allocations DPD have taken the EDS into consideration in the development of the relevant options.

2.3.4 Climate Change

The effects of climate change can potentially have serious damaging effects on the built and natural environment of the borough. An increase in extreme weather conditions will affect biodiversity and habitats and can ultimately alter the species compositions of the fauna and flora. Areas adjoining the River Thames and parts of Lewisham's river network are of particular concern as they are in areas of flood risk.

Efforts to mitigate and adapt to the effects of climate change will be vital for developing a liveable and sustainable environment which will be achieved through the implementation of the development policies. Collectively, these are aimed towards requiring a reduction in resource use, ensuring sustainable construction practices, and linking services and places together to encourage the use of sustainable modes of transport.

This is further reflected in recent draft supplementary guidance released by the Government called *Planning Policy Statement 1: 'Planning and Climate Change'*. The draft guidance sets out how spatial planning should contribute to reducing emissions and stabilising climate change (mitigation) and take account of the unavoidable consequences (adaptation).

2.3.5 Local Plans and Strategies

Community Strategy

The Council is part of the Lewisham Strategic Partnership (LSP). This brings together 20 representatives from the public, private, voluntary and community sectors to promote and sustain joint working to secure meaningful ways of engaging the community at all levels, both in terms of setting strategy and delivering modern effective local services.

The LSP developed a Community Strategy with ten key action plans to improve the wellbeing of Lewisham people, develop local communities and improve public sector performance and delivery. It sets out a long-term vision and brings together the many individual strategies from the different agencies and partnerships into one document. These priority areas are the focus of action which will help achieve the vision which is:

'Together we will make Lewisham the best place in London to live, work and learn'

The Development Plan and Site Allocations DPD is intended to be the spatial implementation mechanism for the Community Strategy. Appendix 3 shows the relationship between the Community Strategy and each preferred option of the emerging Development Policies and Site Allocations DPD.

Transport and Land-use

Land use planning and transport are intrinsically linked in shaping and developing areas in the most effective and sustainable way. The issue of accessibility between home, work, basic services, health, education and community facilities is vital in order to reduce traffic related environmental problems such as air and noise pollution and increase connectivity and permeability between spaces and places.

The Lewisham Local Implementation Plan (LIP) is a statutory document required by the Mayor of London to show how the Borough will implement the Mayor's Transport Strategy. This needs to be consistent with the London Plan, the Mayor's spatial strategy. The LIP outlines how movement through the borough will be managed via local transport policies, the transport network and strategies for future development. The Development Polices and Site Allocations DPD has integrated the key considerations of the LIP into specific development policies and are detailed in the preferred options section of this report.

Air Quality

The urban environment is a major contributor to air pollutants that affect human health and the natural environment. Industrial activity, construction and road traffic emit the majority of these pollutants. This has led to the designation of air quality management areas in urban areas and along busy roads. The Air Quality Management Area (AQMA) in Lewisham is in the north of the borough where the air quality objectives are not likely to be met for NOx (nitrogen oxide) and PM10 (Particulate Matter up to 10 micrometers in size).

The AQMA is the main area for growth in the borough and it is essential that air quality is addressed on a strategic level. The Spatial (Core) Strategy aims to reduce vehicle journeys and distance travelled by locating development close to existing public transport links and areas where public transport will be improved; making homes, jobs, basic services, health, education and community facilities more accessible.

The SELCHP (South East London Combined Heat and Power) waste incineration plant is the only Part A 1 process in the borough and is regulated by the Environment Agency.

The implementation of the Development Polices and Site Allocations DPD aims to reduce vehicle journeys and distance travelled by ensuring development is located close to existing public transport links and areas where public transport will be improved; and making homes, jobs, basic services, health, education and community facilities easily accessible.

Other local plans and strategies

A number of local plans and strategies have been adopted by the Council. The Development Polices and Site Allocations DPD have taken these into consideration, and reflect and

implement relevant objectives and strategies. The following is a list of the local plans and strategies that have been reviewed:

- A Safer Lewisham (2005-2008)
- Climate Change Strategy (2006)
- Early Years Development and Childcare Implementation Plan
- Economic Development Business Plan
- Education and Development Plan (2002-2007)
- Health in Equalities Strategy (2004 2010)
- Lewisham Creative Lewisham Lewisham Cultural and Urban Development Commission
- Lewisham Contaminated Land Strategy (2001)
- Lewisham Energy Policy (2001)
- Lewisham Environmental Policy (2002)
- Lewisham Homelessness Review and Homeless Strategy (2003-2006)
- Lewisham Housing Commission, Final Report (2000)
- Lewisham Housing Strategy (2004 2007)
- Lewisham Local Air Quality Action Plan (2003)
- Lewisham Local Implementation Plan (2005 2010)
- Lewisham Municipal Waste Strategy
- Local Biodiversity Plan A natural renaissance for Lewisham
- Local Cultural Strategy
- Open Space Strategy for Lewisham (2005 2010)
- School Organisation Plan for the London of Lewisham (2004 2009)
- Skills for Life Strategy (2002 2010)
- Social Inclusion Strategy 2005 2013
- Teenage Pregnancy, Parenthood and Sexual Health Strategy (2001 2010).

2.4 SEA DIRECTIVE AND SUSTAINABILITY APPRAISAL

Government guidance (PPS12) requires Development Plan Documents to be subject to strategic environmental assessment to comply with European Union directive 2001/42/EC. The requirement to meet the SEA directive has been met by incorporating the required criteria to the 'Environmental impacts' element of the Sustainability Appraisal (SA), which will be applied to all Development Plan Documents and Supplementary Planning Documents.

The purpose of the Sustainability Appraisal is to assess the social, economic and environmental effects of strategies and policies in a local development document. This has been applied to each preferred option and draft core policy. The Sustainability Appraisal process is integrated with the plan production process so that sustainability issues are fully considered from the outset and the public is informed.

The methodology for producing the Sustainability Appraisal includes an appraisal of the impact of national and regional plans and strategies and this again ensures that the impact of these policies is included in the preparation of the DPDs. Where policies or proposals do not initially meet sustainable objectives and are likely to have an adverse affect, they have been withdrawn, replaced, modified or mitigation measures introduced. The sustainability assessment has made the following key changes to the preferred options in the

Development Policies and Site Allocations DPD (full details of all changes made are provided in the SA report):

Homes for all (Housing)

Affordable housing target has been set at 35% rather than 50% as suggested by the Mayor for London. The target was reduced due to the long term negative impacts on the SA objective on economic growth, which is caused by the relatively low land values in the borough. A higher affordable housing target may make new development proposals less economically viable and hence negatively affect the housing target and economic growth.

Sustainable Movement (Transport and Parking)

Minor changes were made to the wording and sentence structure of some of the policies.

Retail and Town centres

The SA appraisal highlighted that the policy on 'Types of uses in Core, Non- Core and Other shopping Areas (Excludes Lewisham and Catford Town Centre' (RTC2)) had only a small positive effect on the SA objective on Transport. This was improved upon by adding a requirement for green travel plans. The change would put emphasis on the use of sustainable modes of transport which would contribute to making town centres more accessible and hence improve potential for economic growth.

Open Space and Biodiversity

The policy on biodiversity was improved by adding 'public access and appreciation of biodiversity' as an enhancement measure, which can be required from developers. This change resulted from the SA objective on education which showed long term positive impacts if the policy was revised. The improved policy would enable new areas for wildlife to thrive giving local people the opportunity to learn about biodiversity in Lewisham. The policy itself does not actively seek to educate the public but through conservation and protection management measures, a new role in educating the public to the wildlife in the borough could be an indirect benefit. A new policy on open space quality and maintenance (OS5) was added to strengthen the SA objective for landscapes and townscapes.

Sustainable Environment

The SA process highlighted that policies on energy efficiency, sustainable construction, water, flood risk, and climate change showed positive impacts on biodiversity, energy efficiency, water retention, and reducing the heat island effect. A new policy on living roofs was subsequently added to cover all these issues. The policy on construction and demolition waste was strengthened to require the reuse of a minimum of 10% of this waste in the construction process.

Urban Design and Conservation

The policy on Development Sites – Trees, Landscape Planting and Nature Conservation (U3) makes specific mention of living roofs which was included as it showed positive impacts for a number of SA objectives, such as biodiversity, flood risk, energy efficiency and water.

Health, Education and Community Facilities

Minor changes were made to the wording and sentence structure of some of the policies.

Employment land

The SA objectives related to social concerns and employment identified that large new developments would generate opportunities for work, which could benefit local people and hence improve the local economy. Consequently a new policy on local labour agreements was created which will enable local people to access local training and work opportunities in large new development sites.

Site Allocations

The changes made to the site allocations preferred options have been detailed in the SA report.

The Sustainability Appraisal report is published alongside the Development Policies and Site Allocations DPD for public consultation. A copy is available from the Planning Service or online from the Council's Planning Policy website at

http://www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/

3. DEVELOPMENT POLICIES

3.1 HOMES FOR ALL (HOUSING)

Overview

The planning system is the key tool by which all levels of government seek to increase the level of housing. The provision of new homes is vital to meeting the housing need of the community. Throughout England, the Government is committed to promoting sustainable patterns of housing development. This can be achieved through concentrating most additional housing within urban areas; making efficient use of land; adopting a sequential approach to the allocation of land for housing and managing the release of housing land.

Relevant housing issues for development control include:

- The mix of new housing in terms of dwelling size
- The need to provide affordable housing
- The number and type of dwellings that are converted to provide additional housing
- The need for special forms of accommodation to meet local need and
- Gypsy and Traveller sites.

A summary of the responses received from the issues and options consultation, the relationship of this topic to the Community Strategy, and the preferred options for each issues are detailed below.

Issues and Options Consultation

The main responses on the housing topic from the Issues and Options consultation were:

- There was concern over increased housing targets and the pressures this would place on infrastructure and the new demand for facilities, especially health, education and other community and leisure services.
- There needs to be recognition that the nature and size of new housing will create different needs, especially for services and facilities - social and family housing will generate more needs.
- There is a need to integrate and relate any new housing to existing residential areas.
- There is a need to recognise that the greatest housing demand is from the social rented sector.
- There is a need to provide key worker housing.
- There was support for housing mix policies if applied broadly or to affordable housing.
- Conversions should be permitted subject to a threshold on the size of the dwelling to be converted.
- There was support for the retention of the current affordable housing policy, while the GLA supported a lower threshold to ensure greater provision.
- There was support for the concept of mixed and balanced communities, however, decisions should be made on a case by case basis.
- There was support for the provision of special needs and specialist housing subject to controls to ensure there is not a concentration in one area.
- There should be limits to the amount of housing required to be built to Lifetime Homes standards.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF.

The main areas in which housing supports the borough's Community Strategy is through investment in current Council stock and working in partnership to provide new, affordable homes, which supports the Strategy's action of Regeneration (secure the sustainable regeneration of Lewisham, its housing, transport and environment); as well as creating mixed and balanced communities, which contributes to social cohesion and can help make Lewisham a safer place.

HOUSING ISSUES

3.1.1 MIX OF HOUSING SIZE

Housing mix refers to the size (usually in number of bedrooms) of new or converted housing in both market housing and affordable housing. Planning policies have sought to influence the size of housing so that housing needs can be met in terms of matching house sizes to household sizes. This can contribute to the objective of achieving mixed and balanced communities so that housing within any area caters for a range of households, from single persons through to large families.

The Options

Four options were put forward as part of the Issues and Options consultation.

- 1. Set a preferred housing mix for affordable housing.
- Set a preferred housing mix for market housing.
- 3. Set a broad mix for all housing.
- No housing mix policy.

The Preferred Option

The preferred option is to proceed with option 1 and apply option 2 and 3 for market housing.

Draft policies

H1 Housing Mix – Affordable Housing

Affordable housing developments of 10 or more dwellings will be required to provide where practicable, the following overall housing size mix:

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Dwelling Size/Tenure	Social Rented Housing	Intermediate Housing			
1 bedroom	35%	45%			
2 bedroom	40%	45%			
3 bedroom	15%	10%			
4 bedroom	10%				

H2 Housing Mix - Market Housing

For market housing, the Council will seek an appropriate mix of dwellings within a scheme, having regard to the following criteria:

- a) the physical character of the site or building and its setting;
- b) the previous or existing use of the site or building;
- c) access to private gardens or communal garden areas for family units;
- d) the likely effect on demand for car parking within the area;
- e) the surrounding housing mix and density of population; and
- f) the location of schools, shops and open spaces.

Reasons for the preferred option

Consistency with National and regional planning guidance

The need to plan for a mix in affordable housing is supported in PPS3: Housing. Developers should bring forward proposals for market housing which reflect demand and the profile of households requiring market housing, in order to sustain mixed communities. Proposals for affordable housing should reflect the size and type of affordable housing required (paragraph 23).

The mix of accommodation in the Borough should be related to a range of household types and address deficiencies in the range of accommodation. The provision of a mix of dwelling sizes will provide opportunities for existing residents to stay within the Borough as their accommodation needs change and assist in creating communities that are balanced and sustainable by providing greater choice in the range of housing types, styles and tenures.

The London Plan at Policy 3A.4 (Housing choice) seeks to ensure that all new housing developments offer a range of housing choice in terms of housing sizes and types based on local needs. The required mix for market housing developments are in accordance with the GLAs Housing SPG 2005.

The preferred option supports the GLA's Greater London Housing Requirements Study (December 2004) which identified the number of dwellings necessary to meet current and future housing requirements across the region. Further recent research from the GLA (Size Matters, The need for more family homes in London, June 2006) reiterates that a successful affordable housing policy is not just about the amount secured, but it is also about meeting the needs of an area in terms of suitability.

Consistency with other Council documents

The Lewisham Housing Needs Survey (2003) (LHNS) suggests the main shortfall is for three bedroom dwellings. This is broadly reflected in market housing, except there is a shortage in the borough of house sizes of more than three bedrooms when compared against household sizes of more than four persons. The housing mix percentage requirements indicated in the draft policy were derived from Table 9.3 of the LHNS.

What alternatives were considered and why were they rejected

Options 2 and 3 were combined to better reflect national and regional guidance. Option 4 does not support national and regional guidance.

3.1.2 AFFORDABLE HOUSING

In accordance with national and regional policy guidance, the Council expects private developers to make a contribution towards the provision of affordable housing in Lewisham. Affordable housing is defined as housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough. Affordable housing comprises social housing, intermediate housing and in some cases, low-cost market housing. When being sold it is generally housing costing 3.5 times the household income (between £16,400 -£49,000). The corresponding definitions from PPS3: Housing, are:

- Social housing: rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as Policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental agreements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.
- Intermediate housing: housing as prices and rents above those of social rent, but below
 market price or rents, and which meet the criteria set out above. These can include
 shared equity products (e.g. HomeBuy), or other low cost homes for sale and
 intermediate rent.
- **Market housing**: owner-occupied and private rented housing, which does not meet the affordability and access criteria for social housing or intermediate housing.

Despite the average property price for November 2006 in Lewisham (£245,070) being well below the Greater London average (£304,912) affordability remains an issue (Land Registry, Residential Property Price Report, November 2006). Owner occupation is becoming an increasingly difficult goal to achieve. Over 15,000 people are currently awaiting offers of social housing (Housing Directorate, London Borough of Lewisham) with a shortfall existing between the demand for affordable housing and supply.

The key affordable housing policy issues include the:

- Thresholds which determine when an affordable housing contribution is sought;
- Amount of affordable housing provided as part of a development proposal;
- Tenure mix of affordable housing; and
- Need to create mixed and balanced communities.

Related to these issues, particularly the first three, is the economic viability of housing development when affordable housing needs to be included as a component.

Affordable housing thresholds are the levels of housing development on any site above which planning policy will require a contribution to affordable housing. The amount of affordable housing is the number of dwellings to be provided on site (in total) where a site is

developed for market housing. The tenure of affordable housing refers to the type of affordable housing, whether it be social rented and/or intermediate.

The provision and tenure of affordable housing has a significant impact on the creation of mixed and balanced communities and through the application of affordable housing policy the Council has the opportunity to assist in the creation of more mixed and balanced communities at a local level. In various parts of the borough the tenure mix is dominated by social rented housing, while in others, owner occupied and the private rental market are more dominant. Social rented housing makes up 35.6% of all housing in the borough, however, ward variations see some locations above 40% (Bellingham 46.3%, Downham 43.6%, New Cross 52.9%, Telegraph Hill 44.2%) with Evelyn ward containing 70.2% of social rented housing.

The Options

The following options were put forward as part of the Issues and Options consultation. Thresholds:

- 1. To seek a contribution to affordable housing on sites capable of providing more than 15 dwellings or sites of more than 0.5 hectares.
- To seek a contribution to affordable housing on sites capable of providing more than 10 dwellings.
- 3. To seek a contribution to affordable housing on all residential sites.

Amount:

- 1. To seek, as a starting point for negations, a contribution of 20% of affordable housing.
- 2. To seek, as a starting point for negotiations, a contribution of 35% of affordable housing.
- 3. To seek, as a starting point for negotiations, a contribution of 50% of affordable housing.
- 4. To seek, as a starting point for negations, 50% of affordable housing as part of large housing developments.

Tenure and the creation of mixed and balanced communities:

- 1. Affordable housing contribution of 70% social rented and 30% intermediate across the whole borough.
- 2. Only intermediate affordable housing in areas with high social housing.
- 3. Facilitate 'off site' social rented housing.
- 4. Focus social rented housing in areas with currently low representation.
- Make decisions case by case.
- 6. As part of an intermediate contribution, seek key worker housing.

The Preferred Options

The preferred options are as follows:

- 1. Thresholds: Combination of options 1 and 2 but with a lower land size threshold.
- 2. Amount: option 2.
- 3. Tenure and Mixed and Balanced Communities: option 1 and a combination of options 2, 3 and 6.

Draft Policies

H3 Affordable Housing: Thresholds and Amount

Where a development site is capable of accommodating 10 or more dwellings or is 0.3 hectares or more, the Council will seek to secure 35% of new private residential build as affordable housing.

H4 Affordable Housing: Tenure

The required affordable housing tenure mix will be 70% social rented and 30% intermediate provision delivered across private sites. Developer's would be required to demonstrate a mechanism for retaining affordable housing in perpetuity.

H5 Creating Mixed and Balanced Communities

Where a site falls within an area which has existing high concentrations of social rented housing, the Council will seek, in agreement with developers, for any affordable housing contribution to be provided in a way which assists in securing a more balanced social mix within that locality in order to establish and sustain 'viable balanced communities'. This would include more flexible tenures such as 'part ownership' and other shared equity schemes or other types of arrangement as considered appropriate. 'Cash in lieu' payment will not normally be accepted by the Council.

Reasons for the preferred options

The preferred option retains the UDPs affordable housing target of 35% (for new private residential development), however, the provision of affordable housing would apply to sites capable of accommodating 10 or more dwellings, reduced from the current 15 or more dwellings. There would also be a requirement to negotiate affordable housing on sites 0.3 hectares. This has been reduced by a third from the existing 0.5 hectares as the dwelling threshold has been reduced by a third.

The lower thresholds combined with retaining the 35% target would result in a higher percentage of affordable housing being delivered from private development than what currently occurs under the UDP. The tenure mix would adopt the London Plan position of 70% social rented and 30% intermediate provision, however, exceptions would be considered where there are high concentrations of social rented housing to ensure mixed and balanced communities.

A. Thresholds and amount:

Consistency with National and regional planning guidance

The Government and the London Plan both seek to ensure the planning system delivers the maximum amount of new housing. PPS3 recognises that the community's need for affordable housing is a material planning consideration, which should be taken into account in formulating development plan policies and in determining planning applications involving housing. The type and amount of affordable housing should be identified by the Council based on the housing needs of the borough. Suitable developments for affordable housing include new build, as well as mixed-use schemes where the unit threshold is exceeded; livework schemes; and residential conversions from commercial premises.

In setting a local affordable housing target Policy 3A.7 (Affordable housing targets) of the London Plan requires boroughs to take account of regional and local assessments of needs and the London wide strategic target where 50% of all new housing provision should be affordable (from all sources). While Policy 3A.8 (Negotiating affordable housing in individual private residential and mixed-use schemes) seeks a reasonable amount of affordable housing for private developments which would encourage rather than restrain development.

The preferred option is for a 35% threshold from private residential development. This figure excludes affordable housing provided by a Registered Social Landlord (RSL). In 2005/06 six planning applications were received for schemes of 15 dwellings or more or on sites over 0.5 hectares. This resulted in the provision of 246 affordable dwellings (LBL Development Control 2005/06).

The 35% contribution from private developers is further supported through a report released in March 2003 titled 'Thresholds for application of affordable housing requirements' which was prepared by the Three Dragons, Nottingham Trent University, Roger Tym and Partners and Eiluned Morgan. This report was prepared and published for the GLA and the Government Office for London and was commissioned to examine the viability of the 50% affordable housing target. The report recommended that in a borough such as Lewisham a 35% affordable housing target would be more readily achievable. This is due to the lower house prices experienced when compared with the London average and the associated lower than average returns from development. It is unlikely that many schemes could remain viable if required to meet additional costs and achieve close to the 50% London Plan affordable housing target. This approach could undermine the borough's ability to meet housing provision targets.

The Council therefore considers it pragmatic to seek a contribution of 35% of the residential content from private developers. The figure presents a reasonable balance between meeting Lewisham's need for affordable housing whilst not undermining the viability of private housing development. It is achievable and realistic.

Consistency with other Council documents

According to the Lewisham Housing Needs Study (LHNS) Lewisham has a level of current need which is above average and a level of projected need which is well above average. On the basis of these figures the Council could, in theory, be justified in seeking 100% affordable housing, but this is not the role of the planning system. However, the LHNS does support the lower threshold of 10 dwellings which would contribute to meeting housing need.

What alternatives were considered and why were they rejected

For thresholds, options 1 and 2 have been combined to ensure affordable housing provision covers the widest number of sites. Option 3 was dismissed as it would not be economically sustainable.

For the amount of affordable housing, option 1 was dismissed as it is well below the requirements of the London Plan, as was option 4, which would only require a contribution as part of large housing developments. Option 3 is not considered economically sustainable.

For tenure and the creation of mixed and balanced communities, options 1, 2, 3 and 6 have been combined to ensure affordable housing provision covers the widest number of sites and is in accordance with national and regional policy and guidance unlike options 4 and 6 which were the least sustainable.

Other planning reasons

The lower threshold of 10 dwellings or more combined with retaining the 35% target would contribute to the provision of a higher percentage of affordable housing in the borough. In 2005-06, 25 planning applications were granted approval for 10 or more dwellings. Of this, 19 planning applications were between 10 and 14 units which equated to 229 dwellings. If the 35% affordable housing provision was applied, this would have created an additional 80 affordable housing dwellings. Although such schemes have lower profit margins than larger schemes, the London housing market may offer enough profit to justify prescribing that some of these units are provided as affordable. The Council could seek an element of affordable housing on these sites, an approach which is being pursued by several London boroughs and is endorsed by the Greater London Authority.

A 10-14 unit scheme requiring the provision of 35% affordable housing would generate 3 to 4 affordable units per scheme. Provided on site, they would encourage mixed and balanced communities. However registered social landlords have indicated that it is not always viable to have small numbers of affordable units scattered but prefer units in one location. The Council could, where appropriate, seek a payment for off-site provision.

B. Tenure and mixed and balanced communities:

Consistency with National and regional planning guidance

PPS3: Housing (paragraph 20) states that key characteristics of a mixed community are a variety of housing, particularly in terms of tenure and price and a mix of different households such as families with children, single person households and older people. The Council considers it should not be obliged to require additional social housing in locations where there is already an 'over-provision' of that tenure. The diversification of tenure in new housing development is a means of generating a more viable and sustainable mix of households.

The London Plan at Policy 3A.7 (Affordable housing targets) suggests affordable housing should be supplied as 70% social rented and 30% intermediate housing. The GLAs Housing SPG (November 2005) indicates that boroughs should establish locally the required tenure balance based on housing needs studies, an assessment of capacity and potential supply and the provision of mixed and balanced communities. It also indicates that in boroughs which have a high proportion of existing social housing that the provision of higher levels of intermediate housing would assist in achieving mixed and balanced communities.

The London Housing Strategy 2005-16 indicates that London has an uneven spatial distribution of socio-economic groups, potentially damaging to social cohesion. The strategy aims to encourage more mixed neighbourhoods in terms of income, economic activity, tenure and household size to assist in the creation and maintenance of more sustainable communities.

Consistency with other Council documents

An analysis of non-owning households by the LHNS demonstrates that social rented housing is the sub-tenure that is most capable of meeting the great majority of housing need in the Borough. Based on this analysis the Council's preference is for the provision of social rented housing except in those areas which already have high concentrations of this sub-tenure. It would not be possible in this context to achieve the objective of mixed and balanced communities and estate renewal without a greater focus on providing more housing for sale.

The wards of Bellingham, Downham, Evelyn, New Cross and Telegraph Hill are identified as areas of the Borough where over 43% of ward households live in social-rented housing. The Borough average is 36%. The preferred option seeks in areas where there is more than 43% social rented housing, the affordable housing provision required will be sought in a way which assists in securing a more balanced social mix within that locality. This may take the form of more flexible tenures including 'part ownership' and other shared equity schemes as considered appropriate for the delivery of affordable housing. This approach supports the government's objective of creating mixed and balanced communities.

What alternatives were considered and why were they rejected
Options 4 and 5 were dismissed as they would not contribute to the objective of mixed and
balanced communities, do not meet local housing need nor provide an adequate local policy
basis or support national and regional policy and guidance.

3.1.3 CONVERSIONS

Conversions refers to converting the use of an existing building from one use to another use. This primarily involves larger family dwellings being converted into a number of smaller dwellings, usually flats. Conversions have been a valuable source of housing supply in Lewisham and demand for conversions is expected to continue. The key planning issue is whether conversions are appropriate, particularly if larger family dwellings are lost.

The Options

Four options were presented for the Issues and Options consultation:

- Allow conversions.
- 2. Allow conversions only for houses that have a net floor space of 130m² or more as originally constructed.
- 3. Allow conversions but require at least one family dwelling to be provided.
- Do not allow conversions.

The Preferred Options

The preferred option is a combination of options 1, 2 and 3.

Draft Policies

H6 Conversion of Residential Property

The permanent conversion of larger dwelling houses into two or more self-contained units will be considered subject to consideration of the following criteria:

- (a) The scheme results in the provision of an increase in suitable accommodation;
- (b) The size of the dwelling house to be converted is not less than 130 square metres net as originally constructed;
- (c) Suitable family accommodation is provided as part of the conversion in the form of a dwelling with three or more bedrooms:
- (d) The character of the buildings or neighbourhood or the amenities of neighbouring properties is not adversely affected;
- (e) The safe movement of emergency and refuse vehicles or other essential traffic, and pedestrians, is not adversely affected by additional on-street parking;
- (f) The dwelling is not a house in multiple occupation (HMO) which provides a satisfactory standard of accommodation for those who need short term relatively low cost accommodation; and
- (g) Sufficient area of the original garden is retained and provides an adequate setting for the converted building and enough private open space for the use of the intended occupants.

Reasons for the preferred options

Consistency with National and regional planning guidance

PPS3: Housing, seeks to meet housing need and to increase the supply of new housing. Conversions, however, present potentially conflicting objectives. While additional housing is created, this can be at the loss of larger family dwellings which are required to meet housing need. Both objectives seek to achieve the wider objective of mixed and balanced communities.

The preferred option supports housing provision as outlined in the London Plan and the London Plan SPG for Housing. The Council recognises the value of private gardens to provide a refuge for wildlife and provide people with access to the natural environment. The Mayor of London expects that biodiversity and wildlife habitat will be taken into account in proposals for the development of garden land.

Consistency with other Council documents

LB Lewisham carried out a Housing Needs Assessment in 2003 which concluded that the Borough suffers from a shortage of larger housing units (particularly 3+ bed units) and a mismatch between household size and the general size of dwelling. It is for this reason that the draft policy seeks to retain small family units and to provide family units (of 3 bedrooms or more) as part of any conversion.

Whilst it is clear that there is a shortage of larger housing units, the need to protect this form of housing is very much focussed towards preventing conversion of small family houses, rather than promoting the redevelopment of sites to provide a mix of unit types (unless the site can accommodate 10 or more units).

Ensuring the retention of the original garden and use of private open space suitable for the intended occupants supports the Lewisham Biodiversity Action Plan.

What alternatives were considered and why were they rejected

Combining options 1, 2 and 3 as the preferred option ensures consistency

Combining options 1, 2 and 3 as the preferred option ensures consistency with national and regional guidance, contributes towards housing demand and aims to ensure that conversions, while recognised for their contribution to the total housing provision in Lewisham, are sufficiently controlled so as to reduce adverse effects on the residential amenity of the immediate neighbourhood and contribute to the supply of family housing. Option 4 was dismissed as it would not contribute to these objectives.

Other planning reasons

In a primarily residential borough like Lewisham, the potential for additional residential dwellings of one or two bedrooms through conversion of the existing dwelling stock continues to come forward. Analysis of past trends shows the supply of this sort of housing remains a significant source of additional dwellings and meets the London Plan requirements

In order to promote housing choice, the Council must balance the demands for one and two bedroom units with the need for family housing. A family dwelling suitable for households including children, usually consists of 3 or more bedrooms and the minimum size of 130 square metres is considered appropriate and adequate to accommodate this form of household. It is therefore important that the stock of family housing is retained to help meet residents' aspirations to stay within the Borough throughout their life cycle.

3.1.4 SPECIAL NEEDS AND SPECIALIST HOUSING

The provision of special needs and specialist housing is a key requirement of the planning system. The provision of special needs housing is vital in order to meet the needs of the whole community. Special needs and specialist housing is specifically designed to meet the needs of the community that cannot be met through traditional self-contained housing. This can include although is not limited to:

- Older people
- People with physical and sensory disabilities
- People with a learning disability
- People with mental health problem
- Vulnerable young people and children needing care and
- Students.

The Council's aim is to facilitate provision of a full range of accommodation including that provided with an element of social or medical care. The suitability of a site for the provision of special needs and specialist housing will be determined by the proximity of essential local shops and facilities within walking distance, easy access to public transport, and in some cases the topography of the site.

The Options

Two options were considered for consultation as part of the Issues and Options.

- To encourage the provision of special needs housing.
- 2. To encourage the provision of special needs housing but ensure that surrounding land uses are considered so that a concentration of such housing is not created.

The Preferred Option

The preferred option is option 2, which carries the Council's current approach and contributes to the objective of mixed and balanced communities by ensuring there is not a concentration of this form of housing within any given residential area.

Draft policy

H7 Specialist and Special Needs Housing

Specialist and special needs housing falling within classes C2 and C3 of the Use Classes Order will need to:

- (a) Meet a proven local need (for example by being within the approved forward plans of a relevant health and/or social service agency);
- (b) Provide accommodation in a location and of a type that is well designed to meet the needs of the particular client group;
- (c) Be accessible to local shopping facilities, public transport and amenity space;
- (d) Include accommodation for any residential staff in accordance with relevant requirements;
- (e) Be larger than 130 square metres net as originally constructed, if it is a change of use;
- (f) Have regard to the existing distribution of similar types of accommodation within the area to avoid a concentration.

Reason for the preferred option

Consistency with National and regional planning guidance

The preferred option is supported by national and regional policy and guidance. PPS3 seeks to ensure that a full range of housing need is met. Policy 3A.10 (Special needs and specialist housing) of the London Plan seeks to ensure that special needs and specialist housing, including sheltered housing with care support staffed hostels and residential care homes, is provided in order to meet the housing needs of the community. This is reinforced in Policy 3A.13 (Loss of hostels, staff accommodation and shared accommodation) where the loss of such housing and specifically hostels, staff and shared accommodation, should be resisted if it meets an identified need.

Consistency with other Council documents

The LHNS found that those with special needs are more likely to be living in unsustainable housing, therefore adequate provision is essential. The preferred option also contributes to the implementation of the Council's Supporting People strategy.

What alternatives were considered and why were they rejected

Option 2 is the preferred option as this contributes to the objective of mixed and balanced communities by ensuring there is not a concentration of this form of housing within any given residential area in order to protect the character and amenity of the local environment. For this reason option 1 was dismissed.

3.1.5 LIFETIME HOMES AND WHEELCHAIR ACCESSIBLE HOMES

Lifetime Homes are defined as ordinary homes designed to provide accessible and convenient housing for a large segment of the population from young children to frail older people and those with temporary or permanent physical or sensory impairment. Lifetime Homes have 16 design features that can be universally applied to housing design to ensure that the home will be flexible enough to meet the existing and changing needs of most households, as set out in the Joseph Rowntree Foundation report 'Meeting Part M and Designing Lifetime Homes'.

Part M of the Building Regulations deals with accessibility for housing. Lifetime Homes standard adds to the regulation with requirements which seek additional built in flexibility so that housing can better meet the needs of the community. Lifetime Homes include features such as doorways and hallways designed to allow wheelchair access and fixtures and fittings at heights useable for all. These design features help make the homes 'universal' in their appeal and application while providing residents with many advantages.

Wheelchair accessible housing refers to homes built to the standards set out in the National Wheelchair Housing Group report Wheelchair Housing Design Guide 1997.

The Options

Four options were put forward as part of the Issues and Options consultation.

- 1. Require all housing to meet lifetime home standards.
- 2. Require all housing in major developments to meet lifetime homes standard.
- 3. Require 10% of all new housing to be wheelchair accessible or easily adapted for those using a wheelchair.
- 4. Require 10% of all new housing in major developments to be wheelchair accessible.

The Preferred Option

The preferred option is to proceed with options 1 and 3. It is further considered that where developers indicate that not all the 16 points of the Lifetime Homes requirements are achievable, the case could be set out in an access statement.

Draft Policy

H8 Lifetime homes and wheelchair accessible homes

All new residential dwellings should be built to Lifetime Homes Standards and 10 per cent of all new dwellings should be wheelchair accessible or easily adapted for those using a wheelchair. This includes all new build, conversions and flatted development.

Reasons for the preferred option

Consistency with national and regional planning guidance

PPS3: Housing requires that local planning authorities provide a greater choice in housing types and to provide housing which meets the needs of all in the community.

The London Plan at Policy 3A.4 (Housing choice) relates to housing choice and encourages boroughs to ensure that all new housing is provided to lifetime homes standards and that 10% of new housing is designed to be wheelchair accessible or easily adapted for those using a wheelchair. This is further supported through the London Plan SPG, Accessible London: Achieving an inclusive environment.

Consistency with other Council policy documents

The preferred option contributes to the implementation of the Council's Supporting People strategy.

What alternatives were considered and why were they rejected

Option 2 for lifetime homes was dismissed as it would only apply to major developments. The preferred option for wheelchair accessible housing supports the London Plan while option 4 has been dismissed as it would only apply to major developments.

Other planning reasons

Meeting Lifetime Homes standards is considered a cost-effective way of providing homes that are adaptable, flexible, convenient and appropriate to changing needs. They enhance choice, enable independent living and help create more mixed and balanced communities.

It is considered reasonable to apply the preferred option to all new housing. This includes conversions and refurbishments, flatted development for both social housing and private sector housing; with the relevant housing catering for a varying number of occupants. The Joseph Rowntree Foundation estimates that in addition to their added value in adaptability and sustainability, building to Lifetime Homes standards adds one percent or less to a scheme's development costs with substantial savings made longer term. Firstly, because Lifetime Homes are cheaper to adapt as needs change and secondly, the independent living they enable is significantly cheaper, and preferable, than the alternatives of hospitalisation or care homes.

It is sometimes argued that some of the 16 Lifetime Homes components are more difficult to achieve than others, namely parking adjacent to the property and ground floor living rooms, which do not easily fit in with the nature of higher density flatted development. In such circumstances it is considered that applicants would need to justify the variance through an access statement.

3.1.6 GYPSY AND TRAVELLER SITES

The Government defines Gypsies and Travellers as:

'a person or persons who have a traditional cultural preference for living in caravans and who either pursue a nomadic habit of life or have pursued such a habit but have ceased travelling, whether permanently or temporarily, because of the education needs of their dependant children, or ill-health, old age, or caring responsibilities (whether of themselves, their dependants living with them, or the widows and widowers of such dependants), but does not include members of an organised group of travelling show people or circus people, travelling together as such' (ODPM Circular 01/06).

The Council currently operates a site in Thurston Road near Lewisham Town Centre. The 2002 Lewisham Housing Needs Survey did not review the housing needs of gypsies and travellers. The level of demand for sites will be confirmed through further consultation with relevant representative groups and work currently being undertaken by the Greater London Authority.

The Options

One option was put forward for consideration as part of the Issues and Options consultation.

1. Set out criteria for assessing new gypsy and traveller sites.

The Preferred Option

Government guidance outlines that the housing needs of Gypsies and Travellers is an issue that should be considered when formulating planning policy as part of the LDF. Given the release of Circular 01/06 Planning for Gypsy and Traveller Caravan Sites, it is considered that the only option to pursue in the spatial strategy is a criteria based policy when considering new sites.

Draft Policy

H9 Gypsy and Travellers

The Council will continue to assess and provide for the identified needs of Gypsy and Travellers in appropriate locations.

Gypsy and Travellers sites will be assessed against the following criteria:

- (a) It is accessible to local shops, services and community facilities in particular schools and health services:
- (b) It has safe and convenient access to the road network;
- (c) It has provision for parking, turning, service and emergency vehicles and servicing of vehicles;
- (d) The activities do not have an adverse impact on the safety and amenity of occupants and their children and neighbouring residents particularly in terms of noise and overlooking, and other disturbance from the movement of vehicles to and from the site;
- (e) It has a supply of essential services such as water, sewerage and drainage and waste disposal; and
- (f) It is designed and landscaped to a high standard.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

Circular 01/06 'Planning for gypsy and traveller caravan sites' requires boroughs to consult with gypsy's and travellers in order to ascertain what their needs and intentions are in order to determine if site provision is adequate. However, it is the regional planning authorities

responsibility to undertake the Gypsy and Travellers Accommodation Assessment required by the Circular. In London this means the Mayor of London.

Circular 01/06 Planning for Gypsy and Traveller Caravan Sites provides updated guidance on the planning aspects of finding sites for gypsies and travellers and how local authorities and gypsies and travellers can work together to achieve that aim. The preferred option reflects this guidance.

The London Plan Policy 3A.11 (London's travellers and gypsies) requires that boroughs work together to assess the accommodation needs of gypsies and travellers and review capacity. The Council should also protect existing sites, set out criteria for identifying new sites and identify when shortfall occurs. The Mayor is currently in the process of undertaking a Pan-London study to identify gypsies and travellers needs and seek the identification of sites. Following the release of the Pan-London needs study the LDF will include relevant criteria and allocate new sites if and where there are shortfalls. In the interim, in order to identify a site there is a need to establish criteria. The preferred option covers various criteria in order to address amenity issues of the site and those it surrounds.

What alternatives were considered and why were they rejected
Government guidance outlines that the housing needs of gypsies and travellers is an issue that should be considered when formulating planning policy as part of the LDF. Given the release of Circular 01/06 Planning for Gypsy and Traveller Caravan Sites, it is considered that the only option to pursue in the spatial strategy is criteria based policy when considering new sites.

3.2 SUSTAINABLE MOVEMENT (TRANSPORT AND PARKING)

Overview

Transport and parking are crucial elements for a sustainable environment. Car traffic in particular contributes to congestion and air pollution with consequent effects on the economy, health and quality of life. The preferred options presented seek to deal with ways of integrating development with public transport; protecting and improving public transport; the Council's approach to new road building and traffic management; providing for the needs of pedestrians and cyclists; and car and cycle parking standards.

A summary of the responses received from the issues and options consultation, the relationship to the Community Strategy, and the discussion on each preferred option is detailed below.

Issues and Options Consultation

The main responses on the transport and parking topic from the Issues and Options consultation were:

- There was support for higher density development where good public transport is available.
- Walking and cycling improvements and facilities should be considered as part of all new development in order to achieve sustainable transport.
- There was strong support for the Council to require a transport assessment and a (green) travel plan for certain development.
- There was a desire to see local streets designed for local traffic and not as through roads - roads are not just for motorised vehicles and should be designed to reduce vehicle speed to a minimum.
- The walking distance to public transport, the cycle network and distance to schools should be included as a criteria to assess accessibility.
- There was support for developers to contribute to public transport infrastructure where deficiencies are identified.
- There is a need to retain the railway corridors as nature areas.
- Developers should have the option of promoting car free residential development in areas with excellent public transport facilities.
- There was mixed response in terms of car parking standards. There was both support for retaining the current UDP standards and for the adoption of the London Plan standards.
- There was a strong desire to see improvements to all forms of public transport.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF.

Action Plan 2 of the Strategy discusses the need to sustain and improve the health and wellbeing of local people. The LDF can help deliver the LSP action of promoting sustainable modes of transport such as walking and cycling.

Action Plan 6 of the Strategy discusses the need to ensure Lewisham has the transport infrastructure to underpin its social, economic and environmental ambitions. The LDF can help deliver the LSP action of ensuring Lewisham has the transport infrastructure to underpin its social, economic and environmental ambitions, by contributing to the targets of:

- Increasing light rail use (measured by passenger journeys) by 2010
- Improving air quality
- Reducing road congestion
- Promoting integrated transport solutions and investing in public transport and the road network and
- Increasing the number of journeys made by walking and cycling.

TRANSPORT AND PARKING ISSUES

3.2.1 LOCATION AND ACCESSIBILITY

The location of all forms of development and the traffic and people movement associated with that development is a key consideration of government planning guidance and underpins sustainability objectives of the emerging LDF. The aim is to locate the facilities and services people need (jobs, schools, housing, shopping, entertainment and the like) in places which reduce the need to travel, especially by private car.

The Options

Six options were put forward as part of the Issues and Options consultation.

- 1. Allow higher density development only in places where good public transport is available and restrict development in places with poor public transport.
- 2. Require transport assessment/travel impact statements for all new developments.
- 3. Set thresholds for development that will be required to submit travel impact statements.
- 4. Require green travel plan for large scale developments or developments which will generate a 'significant' amount of movement.
- 5. Require developers to contribute to public transport infrastructure where deficiencies are identified.
- 6. Require developers only to meet the immediate transport improvements related to their development.

The Preferred Option

The preferred option is to proceed with options 1, 5 and 6 and proceed with options 2, 3 and 4 with amendments.

Draft Policies

T1 Location of development

Major trip generating developments must be located where:

- (a) Opportunities for public transport use, walking and cycling are maximised; or close to where this can be provided as part of the proposal; and
- (b) The need for car use is minimised.

Improvements to the transport system required for the development to proceed will be secured through a condition or planning obligation on a planning permission.

T2 Development and accessibility

- (a) Major trip generating developments will be required to provide a Transport Assessment to be submitted with a planning application to assess the likely travel movements by all modes and their impact on congestion, safety, and the environment of the surrounding area. The scope of the assessment will reflect the scale of the development proposed and the extent of the transport implications.
- (b) A travel impact statement would normally be accompanied by a travel plan.
- (c) Mitigation measures identified in the Transport Assessment will be secured through a condition or planning obligation on a planning permission.

T3 Travel plans

- (a) Developments that will have a significant transport implication will be required to submit a travel plan in order to reduce the impact of travel and transport on the environment.
- (b) The implementation of a travel plan will be secured through a condition or planning obligation on a planning permission.

T4 Transport infrastructure

In appropriate circumstances, planning obligations will be sought for:

- (a) Highway improvements or traffic management measures, which are necessary for a development to proceed; and/or
- (b) Public transport improvements to services or facilities; and/or
- (c) Other measures to improve accessibility by pedestrians and cyclists.

The cumulative impact of a development will also determine if and when planning obligations are sought.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

PPS3: Housing seeks to reduce car dependence by ensuring proposed development is easily accessible and well connected to public transport.

PPG13: Transport seeks to promote more sustainable transport choices, accessibility to jobs, shops and services as well as reducing the need to travel. PPG13 promotes the use of travels plans for a range of development types which generate a significant level of travel demand, including employment, retail, leisure, education and health uses. Travel plans are

useful tools to ensure that a development minimises adverse environmental consequences of the travel demand it may generate. As such they contribute to meeting sustainability and traffic reduction targets.

The London Plan encourages the integration of transport and development by encouraging patterns and forms of development that reduce the need to travel and by supporting high trip generating development only at locations with high public transport accessibility and capacity. Travel impact statements and travel plans are supported as are planning obligations for transport infrastructure. The preferred options support London Plan policies 3A.5 (Large residential developments), 3C.1 (Integrating transport and development), 3C.2 (Matching development and transport capacity), 3C10 (Phasing of transport infrastructure), 6A.4 (Priorities in planning obligations) and 6A.5 (Planning obligations).

Consistency with other Council documents

The Lewisham Local Implementation Plan (LIP) is a statutory plan to implement the London Mayor's Transport Strategy. The actions set out in the LIP are supportive of implementing a sustainable transport strategy particularly with regard to the location of new development.

What alternatives were considered and why were they rejected
Each option is being pursued (albeit in modified or consolidated form) as they support and
implement sustainability and local objectives and government legislation.

Other planning reasons

Land uses and transport must be integrated. The existing network of public transport should be fully exploited in the interests of efficiency and maximising accessibility. It is appropriate that where developments will make significant demands on public transport their scope for contributing to public transport provisions should be assessed. Developers will be expected to liaise with the Council to determine an appropriate transport strategy for the scheme. Travel assessments can assist in securing sustainable development compatible with wider objectives.

3.2.2 TRAFFIC MANAGEMENT AND ROAD SAFETY

Traffic management is not just about managing traffic flow; it should recognise that people movement is important and should be given priority over the car. Traffic management should aim to:

- Reduce congestion within the Borough
- Establish clear priorities for sustainable transport options and
- Encourage more sustainable transport choices.

Allocation of street space should reflect the priority given to more sustainable forms of transport. By managing traffic and reducing congestion the number of vehicles on the road can be reduced, which will contribute to safer and healthier environments. For the 2001-2011, the Mayor of London aims to reduce weekday traffic by 15% in central London and achieve zero growth across inner London.

The Options

Two options were put forward as part of the Issues and Options consultation.

- 1. Manage and distribute traffic in accordance with the road hierarchy established in the Unitary Development Plan.
- 2. Introduce engineering, education and enforcement measures to improve road safety.

The Preferred Option

The preferred option is to proceed with both options.

Draft Policies

T5 Street hierarchy

The Council will manage the use of streets by establishing the street hierarchy as set out on page 52 consisting of Strategic Roads, London Distributor Roads, Local Distributor and Local Access Roads.

T6 New road building and improvements

New road building will be kept at a minimum and new road schemes and improvements to existing roads will be supported where they:

- (a) Are consistent with the needs of public transport operators, cyclists, pedestrians, safety requirements and local planning objectives;
- (b) Primarily serve other purposes such as regeneration; major public transport improvements; and/or wider traffic management programmes; and
- (c) Allow traffic to be reassigned from unsuitable roads in the hierarchy.

The effectiveness of the use of roads should be measured in terms of the number of people moved rather than vehicles. There should be a general presumption in favour of pedestrians, cyclists and buses in the allocation of road space.

T7 Traffic management

The Council will introduce traffic calming schemes and measures in appropriate locations so as to:

- (a) Reduce traffic to achieve the role assigned to roads in the hierarchy;
- (b) Allocate road space to essential traffic and environmentally friendly modes of transport;
- (c) Reflect the requirements of land uses along the road, in terms of access, essential movement and environmental needs;
- (d) Improve the environment for residents; and
- (e) Take account of the needs of public transport operators.

A planning obligation may be sought for off-site traffic mitigation measures to address potential adverse traffic impacts arising from a development proposal.

T8 Freight

(a) Road freight movements should be restricted and confined to suitable routes in accordance with the road hierarchy in order to protect residential amenity.

(b) Rail and water borne transport of freight will be encouraged with relevant freight operators where such use does not compromise the amenity of neighbouring uses or adversely affect the water environment and air quality.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

PPG13: Transport recognises that priority should be given to people over ease of traffic movement and that traffic management should be undertaken in a way which complements the wider planning and transport objectives; including reducing noise, air pollution and traffic accidents, promoting safe walking, cycling and public transport, and helping to reduce congestion pressures.

The London Plan discusses the need to reduce congestion and make better use of London's streets through road scheme proposals, allocation of street space and local area transport treatments. The preferred options support London Plan policies 3C.15 (Road scheme proposals) to 3C.18 (Local area transport treatments).

The Government initiative Transport 2010 aims to reduce the number of people killed or seriously injured in Great Britain in road accidents by 40% and the number of children killed or seriously injured by 50% (compared with the 1994-98 average); and aims to halt the deterioration in local road conditions by 2004 and eliminate the backlog by 2010.

Consistency with other Council documents

The preferred approach is consistent with the objectives in the Lewisham Local Implementation Plan (LIP). The LIP is a statutory plan to implement the London Mayor's Transport Strategy. The LIP includes proposed actions for traffic management proposals in town centres and area schemes and sets out a road safety plan for the borough.

What alternatives were considered and why were they rejected Both options are being pursued as they support and implement sustainability and local objectives and government legislation.

Other planning reasons

New road construction can help meet movement needs but at a financial and land use cost. A complementary approach is to make the best use possible of existing roads by defining and structuring their use accordingly. Road building alone does not relieve congestion, it just provides for otherwise restrained demand and is therefore unsustainable. The presumption should be in favour of better management of the available road space.

3.2.3 PARKING CONTROL

Parking control performs an important role in influencing people's behaviour and travel patterns. National and regional guidance strongly urges local authorities to restrict the amount of parking in both residential and commercial areas and avoid the over provision of parking to encourage people to choose more sustainable modes of transport which contributes to a healthier more pleasant environment. However, it is important for the Council to recognise and balance the needs of the community against environmentally sustainable objectives to ensure accessibility and social inclusion.

Local authorities are encouraged to seek alternative methods of parking control in order to restrict the amount of parking. The Council will need to investigate alternative parking control measures (such as shared car parking, car-free residential development and 'Home Zones') as a means of contributing to sustainable transport options.

The Options

Nine options were put forward as part of the Issues and Options consultation.

- Continue to use the UDP Car parking standards for new development proposals.
- Adopt the London Plan standards for car parking.
- 3. Introduce some other car parking standards.
- 4. Require specific cycle provision as part of all developments.
- 5. Negotiate cycle provision on an individual basis.
- 6. Promote car-free residential development in areas with excellent public transport facilities.
- 7. Insist on some minimum parking provision in relation to all residential development.
- 8. Extend the provision of controlled parking zones (CPZs).
- 9. Require developers to contribute towards the implementation of CPZs.

The Preferred Option

The preferred option is to proceed with options 2, 3, 4, 6, 8 and 9.

Draft Policies

T9 Home zones

The Council supports the principle of Home Zones and 20 MPH zones and will investigate the experimental introduction of such and similar traffic management schemes so that optimum solutions can be found.

T10 Car free residential development

The Council will support car free development provided that:

- (a) There is very good public transport accessibility; and
- (b) Developers can demonstrate that the development will have no adverse impact on onstreet car parking.

T11 Controlled Parking Zones

The Council will review the existing controlled parking zones (CPZs) and will consider introducing new CPZs particularly in and around:

- (a) Town Centres;
- (b) Railway stations; and
- (c) Other high traffic generating land uses.

Proposals which adversely affect on street parking may be required to contribute to the introduction of a CPZ and a planning obligation may be sought to secure funding.

T12 Car parking standards

The Council will normally require development to make provision for off-street parking in accordance with the standards set out in Table 1. New development shall:

- (a) Provide conveniently located spaces designate for the use by people with disabilities;
- (b) Where appropriate, encourage multiuse parking, including the public use of private commercial car parking spaces; and
- (c) Have regard to the level of public transport accessibility.

T13 Provision for cyclists

The Council will only grant planning permission for development where it makes satisfactory provision for cyclists. In assessing development, traffic management and highway alterations, the Council will seek to:

- (a) Provide a network of well signposted cycle routes throughout the borough;
- (b) Provide suitable and safe cycle routes to schools and on commuter routes which contribute to the London-wide strategic cycle route network;
- (c) Take account of the needs of cyclists in the design of highway improvement schemes; and
- (d) Provide secure, attractive, convenient and adequate cycle parking and changing facilities in the borough's town centres, at public transport interchanges and on business, residential and leisure development sites.

The Council will require development to make provision for cycle parking in accordance with the standards set out in Table 1.

A planning obligation may be sought for cycling measures arising from a development proposal.

T14 Motorcycle parking

The Council will normally require development to make provision for motorcyclists and allocate parking space in appropriate development.

T15 Pedestrian routes and access

The Council will seek to ensure that:

- (a) New developments; and
- (b) Traffic management, highways alteration and parking schemes, provide safe and convenient routes and access for pedestrians which, provide links to public transport.

A planning obligation may be sought for pedestrian measures arising from a development proposal.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

PPG 13: Transport seeks to promote more sustainable transport choices, accessibility to jobs, shops and services as well as reducing the need to travel. To deliver this objective, the guidance recognises that parking policies can be used to promote sustainable transport choices and reduce the reliance on the car for work and other journeys.

The car parking standards do not require developers to provide more spaces than they wish; encourage the shared use of parking; avoid creating disincentives for developers to locate away from town centres; require developers to provide designated disabled parking spaces; and require convenient safe and secure cycle parking.

The London Plan recommends maximum parking standards for broad classes of development. Maximum standards should be used to promote sustainable transport choices. The preferred options support policies 3C.22 (Parking strategy) and 3C.23 (Parking in town centres).

Consistency with other Council documents

The LIP sets out a Parking and Enforcement Plan for the borough. This sets out details of the operational policies including proposed CPZs and how the Council proposes to enforce its parking policy.

Cycling will be promoted in the Borough and the Council will work with relevant agencies to maintain and provide free cycle carriage on rail and promote cycle use of bus lanes. The needs of cyclists will be pursued in all new development, road and traffic management schemes.

What alternatives were considered and why were they rejected

Option 1 was dismissed as parking standards need to be updated, reflect current government policy and achieve sustainable transport objectives. Option 2 is part dismissed as the Council believes there are specific characteristics for Lewisham which need to be listed. Option 3 is part dismissed as the London Plan has more restrictive parking standards for certain land uses than what current provision would permit. Restrictive parking provision could depress economic performance, contribute to illegal parking or parking in undesirable areas or displace vehicles to neighbouring areas with less restrictive parking standards. Option 5 was dismissed as cycling is a sustainable transport mode and all developments should provide cycle parking in accordance with clear guidance.

Table 1. Lewisham Car Parking Standards

Please refer to the notes at the end of the table for an explanation of the standards and terms used.

Use Class	Description	Parking Standard (Maximum)	Cycle Parking	Detail
RETAIL A1	Food stores up to 500m² Food supermarket up to 2500m² RFA/4000m² GLA Food superstore over 2500m² RFA/4000m² GLA Non food warehouse	(Maximum) 1 space per 35-50m² (PTAL 2 to 4) 1 space per 75m² (PTAL 5 to 6) (Source: London Plan) 1 space per 20-30m² (PTAL 2 to 4) 1 space per 30-45m² (PTAL 5 to 6) (Source: London Plan) 1 space per 18-25m² (PTAL 2 to 4) 1 space per 25-38m² (PTAL 5 to 6) (Source: London Plan) 1 space per 30-50m² (PTAL 2 to 4) 1 space per 30-50m² (PTAL 5 to 6) (Source: London Plan)	Town centre/local centre: 1 space per 125m² (Source: UDP) Out of centre: 1 space per 350m² (Source: UDP) Town centre/local centre: 1 space per 300m² (includes garden centres) Out of centre: 1 space per 300m² with minimum of 4 spaces (Source: UDP)	Customer parking may be considered unnecessary in certain locations. Under such circumstances planning obligations will be sought for transport improvements. Customer parking may be considered unnecessary in certain locations. Under such circumstances planning obligations will be sought for transport improvements.

Use Class	Description	Parking Standard (Maximum)	Cycle Parking	Detail
	Shopping mall/complex in town centre	1 space per 35-50m ² (PTAL 2 to 4) 1 space per 50-75m ² (PTAL 5 to 6) (Source: London Plan)	Suggesting: 1 space per 300m ²	
A2	Financial and Professional	Nil (Source: London Plan)	1 space per 125m ² with minimum of 2 spaces (Source: UDP)	Headquarters-style buildings of financial buildings and high street banks, building societies etc., should be treated as B1 offices.
A3	Restaurants & Cafes	Nil (Source: London Plan)	1 space per 20 seats (Source: UDP)	
A4	Drinking establishments	Nil (Source: London Plan)	1 space per 100m ² (Source: UDP)	
A5	Hot food takeaways	Nil (Source: London Plan)	1 space per 50m ² (Source: UDP)	
BUSINESS		,	,	
B1 (a) B1	Offices	1 space per 600-1000m ² (Source: London Plan)	1 space per 125m ² with minimum of 2 spaces (Source: UDP)	
B1 (b), (c) B2 and B8	Research and development, light industry, general industry, warehousing, storage and wholesale distribution	1 space per 600-1000m ² (Source: London Plan)	1 space per 500m ² (Source: UDP)	Associated office space will be treated as offices for parking requirements. Parking must take account of minimum operational needs. Developments that operate HGVs as part of their business or anticipate deliveries by HGVs must provide at least one HGV space.
Sui Generis	Builders merchants, car sales, rental, service and repair garages	1 space per 600-1000m ² (in addition to any vehicle display areas)	1 space per 500m ² (Source: UDP)	Some Sui Generis uses are considered acceptable in employment locations. Parking standards are required to resist the over supply of parking for customers on such sites.

Use Class	Description	Parking Standard (Maximum)	Cycle Parking	Detail
RESIDENTIAL				
C1 Hotels	Hotels including boarding houses and guest houses	To be determined on an individual basis using a transport assessment and travel plan to support the level of parking. (Source: London Plan)		Appropriate taxi ranks and coach/bus parking stands will be required as part of the Transport Assessment.
C2 Residential institutions	Residential schools/colleges	To be determined on an individual basis using a transport assessment and travel plan to support the level of parking. (Source: London Plan)		
C3 Dwelling houses	Houses: Detached/ Semi Detached	1.5-2 spaces per dwelling (Source: London Plan)	1 space per house	
	Terrace houses	1-1.5 spaces per dwelling (Source: London Plan)	1 space per house	
	Flats	1 to less than 1 space per flat (Source: London Plan)	1 space per flat	
Other Residential				
	Live/Work	As per Class B uses with 1 space per unit for the residential component.		It may be appropriate to reduce parking in locations with good access to public transport.
	Children's Homes, Elderly Person's Homes and Nursing Homes	1 space per 4 resident bed spaces (Source: London Plan)		A Transport Assessment and Travel Plan are required to support the level of parking.
EDUCATION AND		T	T	
C2	Hospitals	Considered on an individual basis using a transport assessment and travel plan to support the level of parking.	1 space per 5 staff plus 1 space per 10 staff for visitors (Source: UDP)	Full details of staff numbers, bed spaces and visitors will be required to support the level of parking.

Use Class	Description	Parking Standard	Cycle Parking	Detail
		(Maximum) (Source: London Plan)		
D1 Non-residential institutions	Adult training centres, conference centres, libraries and community centres Higher and further education establishments (vocational and academic)	Considered on an individual basis using a transport assessment (Source: London Plan) Considered on an individual basis using a transport assessment and travel plan to support the	1 space per 10 staff plus 1 space per 10 visitors (Source: UDP) 1 space per 8 staff/students (Source: UDP)	
	Day centres and pre- school play and nursery	level of parking. (Source: London Plan) 1 space per 2 staff (Source: London Plan)		
	provision Primary, secondary and special schools	Considered on an individual basis using a transport assessment and travel plan to support the level of parking.	Primary and special school: 1 space per 10 staff Secondary school 1 space per 10 students/staff (Source: UDP)	Non-residential education and training centres may require some parking for staff and operational requirements but the focus of attention should be on child safety, including segregation of vehicle and pedestrian movements on site. Safer routes to School programmes should be promoted. Safe and convenient dropping off/collection areas should be provided for parents' cars and coaches/school buses.
	Medical and other health practices, including dental, veterinary and alternative medicine	Considered on an individual basis using a transport assessment.	1 space per 5 staff (Source: UDP)	A Transport Assessment and Travel Plan may be required to support the level of parking.
LEISURE				
D1	Places of worship	Considered on their merits		
D2	Theatres and cinemas	Considered on an individual basis using a	1 space per 50 seats (Source: UDP)	A Transport Assessment and Travel Plan may be required to support the level of

Use Class	Description	Parking Standard (Maximum)	Cycle Parking	Detail
		transport assessment.		parking.
	Health clubs, licensed clubs and sports facilities with or without a licensed clubhouse	Considered on an individual basis using a transport assessment.	1 space per 10 staff plus 1 space per 20 peak period visitors (Source: UDP)	A Transport Assessment and Travel Plan may be required to support the level of parking.
DISABLED				
All Use Classes		10% of all parking provided at a minimum of 2 parking bays. The appropriate number of disabled parking bays will be assessed on the size of the site and the nature of the proposed use. (Source: London Plan)		Parking for disabled people is additional to the maximum parking standards.
All use classes	OPED AND SCOOTER PARK	ING		The parking spaces should be located as near as possible to the building entrance(s). Large developments will be
				expected to include shower and changing facilities.

Use Classes

Use Classes are defined by the Town and County Planning (Use Classes) Order 2000.

Floor space

The floor space in all cases refers to gross floor area, including the thickness of walls, unless otherwise indicated. RFA refers to retail floor area.

Standards

(a) All standards are maximum unless otherwise stated.

- (b) The parking requirements are calculated separately for each use where several land uses are combined within one scheme. However, where mixed uses clearly generate demands at different times of day, consideration will be given to a level of parking provision based on the maximum amount of parking space required at any one time.
- (c) All calculations should be rounded up to the nearest whole number.
- (d) All staffing figures should be read as full-time equivalent staff employed at peak times.

Parking space sizes

The minimum dimensions are:

Standard car parking space (or bay):

Wheelchair accessible car parking space:

Motorcycle/ moped/ scooter parking space:

Articulated vehicle space:

Coach space (60 seats):

2.4m x 4.8m

3.6m x 4.8m

1.4m x 2.5m

3.5m x 18.5m

3.5m x 14.0m

Note:

- The term 'one space' used in the standards refers to standing area only and does not include manoeuvring space or space for un/loading.
- Single garages will be accepted as parking space for bicycles if the internal width exceeds 3.5m or the length 5.3m.

Loading Arrangements

Sufficient space for the standing and manoeuvring of all goods vehicles likely to serve the development at any one time is essential. At least 50m² should be provided, laid out to accommodate the largest vehicle likely to be accommodated. Development layouts should allow all vehicles to enter and leave the site in a forward direction.

Car parking layouts

All surface car parks should be adequately screened and landscaped and where possible laid out in small groups of parking spaces. Development will only be permitted where it provides off-street parking, turning, loading and unloading for service vehicles to the satisfaction of the Local Planning Authority. Attention should be paid to "Secure by Design" considerations.

New Buildings, Extensions and Changes of Use

The council will have regard to existing parking on a site and may consider the possibility of a reduction in the amount of parking where the new use requires fewer spaces than the existing use of the site. Where standards differ between uses in the same Use Class or between uses which are

allowed as permitted development under the Town and Country Planning (General Permitted Development) Order 1995, conditions may be applied to planning permissions restricting rights to change the use of the site without the consent of the LPA.

Development not providing parking

Developments below the relevant parking standard threshold will be considered on their merits having regard to the transport and parking strategy and regeneration objectives. The required parking provision will be used as a starting point in negotiating suitable on-site parking. The Council will have regard to the level of public transport access and the proposed uses.

Uses not mentioned

For uses not mentioned provision will be a matter for negotiation between the applicant and the Council, considered on their merits based on restraint. For large scale developments a travel plan will normally be required.

Parking for wheelchair users and people with disabilities

In accordance with PPG13, there will be a requirement for an additional 10% of all parking spaces on a site to be designated as disabled parking bays. However, the London Plan advises that there should be flexibility with this requirement and therefore the appropriate number of disabled parking bays will be assessed on the size of the site and the nature of the proposed use. The disabled parking bays will be required to be provided to the mobility standard of 3.6m x 4.8m, specifically marked out and positioned as near as possible to the entrance of the building. As a guide at least two parking bays should be for this use.

Multiple use of parking facilities

Applicants may consider the multiple use of parking facilities (for use by different sections of the community, for different uses and either at the same or at different times). The multiple use of parking facilities may require planning permission and applicants should contact the Local Planning Authority to discuss their proposals before proceeding. Shared parking or multiple use of parking spaces may be encouraged to maximise parking in appropriate locations. Multiple use parking will only be permitted where there is full co-operation from all occupiers. Such parking arrangements will not be considered as a means of meeting the required parking standards for a development.

Front garden and garage parking

Hard surfacing of front gardens to provide new or additional off-street parking can be detrimental to the local streetscape and character. Where new or additional parking is unavoidable, design advice should be sought from the Council. Similarly, the conversion of garages to provide additional accommodation can have a harmful effect, particularly if the alteration is out of keeping with the original dwelling. Again, design guidance should be sought from the Council. This particularly applies in conservation areas. Where a space within a curtilage is a garage, a condition will normally be

applied, preventing the garage from being used as a habitable room to ensure it remains as a parking space. Garages will be required to maintain an internal width of 3000mm.

Uses likely to generate coach traffic

Uses likely to generate coach traffic (e.g. hotels, public halls, educational establishments, swimming and sports facilities, theatres etc) should provide adequate off-street facilities for coaches, including pick-up and set-down points, manoeuvring space and sufficient parking bay(s). Development layouts should allow for coaches to enter and leave the site in a forward gear.

Cycle parking

Cycle parking facilities should be conveniently located, secure, easy to use, sheltered, well lit and signposted. Details will need to be submitted with a planning application.

3.2.4 PROMOTION OF PUBLIC TRANSPORT IMPROVEMENTS

In general the Council will support and promote public transport improvements that are of benefit to local residents. There is also a need to protect essential transport infrastructure without which the transport system would not function. The Council also promotes and supports new public transport provision and improvements of existing facilities. Although the provision of new rail and bus routes are the responsibility of other public and private bodies such as central government, the Mayor of London and the various rail and track operators, the Council believes it is important to state publicly that it supports certain proposals.

The Options

Three options were put forward as part of the Issues and Options consultation.

- The Council will encourage the safeguarding of transport facilities through avoiding inappropriate development.
- 2. The Council will support and promote public transport improvements.
- 3. The Council will support rail and other transit improvement schemes that benefit local residents, subject to acceptable environmental impacts, in particular:
 - East London Railway
 - Extension of DLR from Lewisham to Catford
 - DLR 3 car capacity enhancement
 - Extension of the Croydon Tramlink to Lewisham
 - Extension of the Greenwich Waterfront Transit to Canada Water
 - Orbital rail route improvements

The Preferred Option

The preferred options is to proceed with options 1 and 2 as they relate to transport interchanges as the other options are being pursued through the Spatial (Core) Strategy Development Plan Document.

Draft Policy

T17 Transport interchanges

- (a) Better interchange within public transport, and between public transport and private transport, will be sought as opportunities arise. Where appropriate developments should improve such facilities and provide for cycle parking.
- (b) A comprehensive programme of interchange improvements will be pursued with relevant agencies and transport providers.
- (c) The use of planning obligations and conditions on planning permissions may be used in pursuit of this policy.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The London plan sets out the major transport schemes and developments that the Mayor supports. Some of the proposals supported by the Council are not included in the current 10 year plan for transport improvements. However, the council considers early promotion of transport improvements to be worthwhile while acknowledging that the money and authority to implement these schemes does not lie with the Council. London Plan policies which supported the preferred options include policy 3C.9 (Increasing the capacity, quality and

integration of public transport to meet London's needs), 3C.10 (Phasing of transport infrastructure), 3C.11 (New cross-London links with an improved National Rail network), 3C.12 (Improved underground and DLR services), 3C.13 (Enhanced bus priority, tram and bus transit schemes) and 3C.19 (Improving conditions for buses).

The preferred options support TfLs Business Plan 2005/9 -2009/10, 5 Year Investment Strategy.

The preferred options support the implementation of the London Bus Priority Network, accessibility improvements at bus stops, promoting new bus service links such as between Blackheath and Greenwich and public transport improvements to new developments.

Consistency with other Council documents

The Lewisham Local Implementation Plan is a statutory plan to implement the London Mayor's Transport Strategy. The actions set out in the draft LIP are supportive in the promotion of public transport and seek improvements in the Borough.

What alternatives were considered and why were they rejected
It was not considered appropriate to consider options as the transport improvement
proposals put forward are the responsibility of other organisations and the Council is only
required to reflect the appropriate land use policies in the emerging LDF.

Other planning reasons

Integrated transport opportunities promotes passenger convenience and use. Through its development control functions the Council can attempt to ease its problems of physical interchange. Public transport operators will be urged to improve the accessibility of their vehicles and rolling stock for the use of people with disabilities and to provide new or improved services.

The Road Hierarchy (taken from the UDP and LIP)

Strategic Routes (Transport for London Road Network)

A2 New Cross Road to Shooters Hill Road (including Kender Street)

A20 New Cross Road to Eltham Road

A202 Queens Road to New Cross Road

A21 Molesworth Street to Bromley Hill

A205 South Circular

London Distributor Routes (LBL Responsibility)

A212 Westwood Hill to Catford Hill

A213 Newlands Park

A200 Evelyn Street to Creek Road

A2015 Beckenham Hill Road

A2209 Deptford Church Street

A2210 Brookmill Road, to Baring Road

A2211 Lewisham Road

A2212 Burnt Ash Road, Baring Road

A2214 Lausanne Road

A2216 Dartmouth Road to Sydenham Road

A2218 Southend Lane and Stanton Way

Local Distributor Routes

B206 Plough Way to Grove Street

B207 Trundleys Road Pagnell Street

B220 Belmont Hill to Prince of Wales Road

B212 Lee Road

B218 Florence Road to Brockley Rise

B226 Chinbrook Road to Grove Park Road

B227 Perry Vale to Perry Rise

B236 Adelaide Avenue to Ladywell Road

B238 Forest Hill Road to Honor Oak Park

B2142 Gellatly Road to Brockley Cross

Hither Green Lane

Local Access Roads

All other roads not identified in the above list.

3.3 RETAIL AND TOWN CENTRES

Overview

The London Borough of Lewisham recognises that it has a key role to play in encouraging retailing and town centre development, as well as having regulatory planning control. As such, the Council must provide an adequate framework within the Spatial (Core) Strategy and Development Plan Documents to enable the retailing industry to establish and maintain appropriate town centre facilities in a way that meets the objectives of the Government's sustainable development agenda.

This chapter deals with:

- District centres
- Neighbourhood centres and
- Local Shopping Centres and Parades and
- Out of Town centres

And discusses their:

- Role and function
- Vitality and viability
- Accessibility and car parking
- High quality environment and design
- Modification to any of the boundaries

LEWISHAM AND CATFORD MAJOR TOWN CENTRES

The preferred options for the Lewisham and Catford town centres are included as part of the Spatial Strategy and are the subject of separate area action plans which provide the planning and policy framework for their regeneration and on-going development.

DISTRICT CENTRES

The role and function of the district centres changes from centre to centre. However, there is need to consider this role and function and determine whether it should be maintained, improved or encouraged in a particular direction. Each district centre has unique characteristics linked to the surrounding communities. Some centres have strong evening economies, others provide a vibrant local convenience market and others a balance of comparison and convenience stores. These attributes provide a variety of centres within the London Borough of Lewisham.

These District Centres comprise of:

- Blackheath
- Deptford
- Downham
- Forest Hill
- Lee Green
- New Cross and New Cross Gate
- Sydenham

Issues and Options Consultation

The main responses from the Issues and Options DPD consultation were:

- With the dominance of car-orientated supermarket provision, it is difficult to see how
 every small shop can survive. With good design standards, continuing the
 conversion of derelict retail premises to residential use greatly improves the
 appearance of an area.
- Support the move from retail to alternative uses in Local Shopping centres and Parades.
- Out of centre retailing has destroyed vitality & viability of local high streets and should be firmly discouraged.
- Large scale bulky goods retailing should be encouraged in town centres or at edge of centre only.
- Car parking is a problem.
- Cycling and walking should be encouraged by new development.
- New Cross does not function well as a 'District Centre' currently. Needs to primarily cater for the local student population/enhance/evening economy.
- Overlay 'special districts' at Deptford station/Resolution Way.
- Restriction on uses in Blackheath is important to maintain some balance & provide some basic convenience shopping.
- An evening economy is needed in Lewisham Town Centre.
- A Metropolitan status would be of benefit to the wider area of Lewisham Town Centre and would capitalise on the improved public transport links now available.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF. The main areas in which Retail and Town Centres aim to deliver the Community Strategy is through fostering enterprise and sustainable business growth including the creative industries, by securing the sustainable regeneration of Lewisham and through to improving the effectiveness, efficiency and sustainability of local public services. This reinforces the Community Strategy's Action Plans 4, 6 and 10.

3.3.1 ROLE AND FUNCTION

The Borough's district centres have many convenience shops catering for the diverse local multi-cultural community and there primary role and function is that of a local convenience supplier of goods and services. This is illustrated by the small number of comparison goods outlets and the high proportion of service uses located within Deptford, Downham, Forest Hill, Lee Green and Sydenham. The limited number of 'high street' names are located in low quality properties and the dominance of the busy roads through the district centres creates a difficult pedestrian environment.

Deptford is set to be transformed through the £25 million investment in a replacement Deptford railway station which will provide a safer, accessible and more welcoming environment. The project will also provide much needed housing as well as safeguard and enhance the historic carriage ramp, one of the oldest surviving railway structures in London. It is proposed that a Design led strategy to improve the function of the open spaces and routes into and out of Deptford is combined with other regeneration opportunities in the area. Therefore, a North Lewisham Masterplan has been produced which seeks to reinforce the role of open spaces and connectivity between regeneration sites and key transport links.

Downham is the smallest district centre with its location being sited between Catford and Bromley also indicate that the general nature of the shopping area is service and convenience orientated.

The recent high vacancy levels in Forest Hill are considered to be influenced by the properties involved in the Sainsbury's expansion and as such could potentially have a detrimental effect to the rest of the centre.

There are 82 units contained within the Lee Green centre, 62 within Lewisham and 20 within Greenwich The majority of floor space are in convenience stores, the largest being Sainsbury's. In addition there are a range of service uses and a reasonable amount of office space within the town centre.

The New Cross centre is located in the north of the Borough and is the fifth largest centre. The centre does not contain a core retail area with the main shopping function being on the northern side of New Cross Road which is designated within the UDP as non-core retail. The high level of service uses is also influenced by the presence of the student population from Goldsmiths College. The Sainsbury's store at the western end of the centre is likely to have a wide retail catchment.

The Sydenham district centre provides for the day to day needs of the local population. The higher than average convenience floor space and the lower than average comparison offered indicate this local function.

The Options

A choice of six options were put forward as part of the options for District centres in the issues and options consultation.

- 1. Maintain and enhance the existing focus and strength of the role and function of district centre, of that of a local service centre.
- 2. Enhance the existing focus and strength of the role and function of the District town centre, to that of a local service centre.
- 3. Aim to attract more national names to diversify the provision of goods and services within the District centres.
- 4. Enhance and further encourage the existing strength of the evening economy.
- 5. Increase the number of comparison stores, towards a balance of convenience and comparison outlets, similar to national averages (i.e. to enhance the day time economy).
- 6. Encourage new residents to the area, which would require a greater variety of shops to the Deptford district centre.

The Preferred Option

The preferred option is to proceed with option 1 and 6

Reasons for the Preferred Option

Consistency with National and regional planning guidance

The preferred option supports the objectives detailed in PPS6 which states that the Government's key objectives for retail and town centres is to promote their vitality and viability by planning for the growth and development of existing centres. This includes promoting and enhancing existing centres by focussing development in such centres and encouraging a wide range of services in a good environment accessible to all.

The London Plan policies 3D.1 (Supporting town centres) and 3D.3 (Maintaining and improving retail facilities) are also supported by the preferred option.

Community Strategy and other Council policy documents

The Council's Community Strategy and specifically the objectives to foster enterprise and secure sustainable regeneration as set out in Action Plan 4 is supported by the preferred option. Deptford is proposed to undergo a complete facelift with substantial investment in all sectors as outlined in the draft North Lewisham Masterplan and the draft Lewisham Regeneration Strategy. In light of these changes, the option for mixed use development will be acceptable in principle subject to other policies in the LDF.

Issues and Options Sustainability Appraisal

Responses strongly supported the preferred option to maintain the current levels of diversity offered within the town centre.

What alternatives were considered and why they were rejected.

Option 1 provided more scope for the viability of the district town centres and was more adequately reflective of the direction, the core strategy aims to pursue. As such Option 2 was considered unfavourable.

Option 3 was focused towards vying for inward investment from large high street retailers. To some extent this will be a long term goal for the future of the boroughs district centres but this could place unwanted pressure on existing convenience stores and retailers.

Option 4 was an important issue but wasn't the main impetus for the role and function of Lewisham's District Centres.

Option 5 is relevant and necessary to fortify the role of District centres and to be able to compete against some of the larger retail areas within and outside the borough. However, as indicated in the Boundary issues, it was decided that no expansion would be made within this plan period. As such this option was unfavourable.

3.3.2 VITALITY AND VIABILITY

Ensuring town centre vitality and viability is a key objective for the Council and is in keeping with the national policy direction of PPS6. Vitality and viability can primarily be achieved through planning for the growth of existing retail and town centre areas and promoting and enhancing existing centres. There are currently no core or non-core areas designated within the New Cross district centre.

The Options

Three options were put forward as part of the options for District centres in the issues and options consultation.

- 1. The use of designated Core and Secondary or Non-Core areas within the District Centre.
- 2. Specialist areas or quarters which have a focus on a particular/complimentary use/activity.
- 3. No restrictions on various uses within the designated centre boundary.

The Preferred Option

The preferred option is to proceed with a combination of options 1, and 2 in the boroughs district centres. This would see the use of Core and Non-Core shopping areas within the District Centre, which would be extended further than the existing core area as well as a focused 'specialist area' surrounding the Deptford train station development. This 'specialist area' surrounding the train station will allow flexibility for considering applications which will enable a more diverse evening economy to establish in the area surrounding the train station in line with the North Lewisham Masterplan currently being prepared.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option supports the objectives detailed in PPS6 which states that the Government's key objectives for retail and town centres is to promote their vitality and viability by planning for the growth and development of existing centres. This includes promoting and enhancing existing centres by focussing development in such centres and encouraging a wide range of services in a good environment accessible to all.

The London Plan policies 3D.1, supporting town centres specifically mentions designating core areas primarily for shopping uses and secondary areas for shopping and other uses and setting out policies for the appropriate management of both types of area. Policy 3D.3 of the London Plan, maintaining and improving retail facilities, is also supported by the preferred option.

Community Strategy and other Council policy documents

The Council's Community Strategy, and specifically the objectives to foster enterprise and secure sustainable regeneration as set out in Action Plan 4 is supported by the preferred option.

The Lewisham Town Centre Health Checks 2004 report illustrates that currently all District Town Centres Downham, Forest Hill, Lee Green, New Cross and Sydenham have not been successful in maintaining 70% A1 use within the core area so any core area policy would need to be considered against the existing unsuccessful one. Therefore there is an identified need to protect these uses, and this can most effectively be done through the use of a core and non-core area policies.

Table 2. Town Centre Health Checks - 2004

	BLACKHEATH	DEPTFORD	DOWNHAM
CENTRE TYPE	District	District	District
PTAL	3	3	2
TOTAL FLOORSPACE	11,519	28,242	n/a
(sq.m)			
TOTAL UNITS	123	259	73
A1 UNITS TOTAL (%)	73 (59%)	155 (60%)	45 (62%)
A2 UNITS TOTAL (%)	17 (15%)	18 (7%)	5 (7%)
A3 UNITS TOTAL (%)	28 (23%)	35 (14%)	13 (18%)
OTHER UNITS TOTAL (%)	4 (3%)	25 (10%)	7 (10%)
VACANT TOTAL (%)	1 (1%)	26 (10%)	3 (4%)

	FOREST HILL	LEE GREEN	NEW CROSS	SYDENHAM
CENTRE TYPE	District	District	District	District
PTAL	3	3	6	3
TOTAL FLOORSPACE	18,209	n/a	20,930	23,876
(sq.m)				
TOTAL UNITS	156	90	109	179
A1 UNITS TOTAL (%)	60 (38%)	41 (46%)	44 (40%)	97 (54%)
A2 UNITS TOTAL (%)	15 (10%)	6 (7%)	9 (8%)	19 (11%)
A3 UNITS TOTAL (%)	29 (19%)	20 (22%)	29 (27%)	30 (17%)
OTHER UNITS TOTAL (%)	12 (8%)	12 (13%)	10 (9%)	19 (11%)
VACANT TOTAL (%)	40 (26%)	11 (12%)	17 (16%)	14 (8%)

Issues and Options Sustainability Appraisal:

Options 1 and 2 proved the most sustainable within all of the district centres.

What alternatives were considered and why they were rejected.

Allowing this form of development would see an undistributed rise in un-neighbourly uses and a potential loss of essential uses e.g. A1. Option 3 would be inconsistent with National and Regional policy.

3.3.3 ACCESSIBILITY

Accessibility is part of the essential mix to any successful retail and town centre. Whilst the main issues on this matter will be included under the transport chapter it is necessary to consider the impact and location of transport networks and the interchanges within the borough's district centres.

Blackheath and Forest Hill are well served by mainline rail services and buses. There are also a significant number of on-street parking spaces within and around the centre which facilitate commuters.

Deptford, New Cross and Sydenham are all located on the rail network, which provide good access to the centre. Improvements to the Deptford train station and surrounds are anticipated to commence in the near future. with the railway stations at New Cross, New Cross Gate and Sydenham offering frequent services to central London, Lewisham, other areas within the Borough, the South East, and also interconnect with the London Underground East London line.

Lee Green, New Cross and Sydenham provide good car parking facilities and bus services connecting these centres with Lewisham, Catford and the surrounding area. Within the three centres there are at least eight bus services which serve the centre as well as 19 departing from either New Cross station or New Cross Gate railway stations and at least nine bus services departing from Sydenham into Central London. With the exception of Sydenham, many of the car park facilities are provided for by large retailers with some car parks accommodating up to 400 vehicles.

The Option

One option was put forward as part of the issues and options consultation.

1. Encourage greater accessibility by public transport, walking and cycling to all retail and town centres.

The Preferred Option

The one and only option put forward is the preferred option. Which would also be in accordance with policy CP30 of the Core Strategy.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option supports the objectives detailed in PPS6, as well as supporting London Plan policies 3D.1 which specifically refers to improving access to town centres by public transport, cycling and walking.

Community Strategy and other Council policy documents

The Council's Community Strategy and specifically the objective to secure sustainable regeneration as set out in Action Plan 6 is supported by the preferred option.

Issues and Options Sustainability Appraisal:

There was support for this option from the issues and options consultation exercise and there were no further options which were put forward as part of the consultation.

What alternatives were considered and why they were rejected.

There were no alternative options.

3.3.4 HIGH QUALITY ENVIRONMENT AND DESIGN

There is a need to ensure that retail and town centres provide a high quality environment, as well as encouraging good design. The preferred options developed as part of this chapter will link to the preferred options for urban design.

The Options

Two options were put forward as part of the issues and options consultation.

- 1. Policies which encourage good quality design and seek improvements to the existing retail environment.
- 2. Development of a specific design guide for each of the District Town Centres.

The Preferred Option

The preferred option is to proceed with option 1 and encourage good quality design and seek improvements to the existing retail environment and to set a high standard of design for future retail needs, in accordance with policy CP30 of the Core Strategy. It should be noted that Forest Hill is the only district centre which has had a design guide produced

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option supports the objectives in PPS1 and PPS6, as well as supporting London Plan policies 4B.1 (Design Principles for a compact city) and 4B.7 (Respect local context and communities).

Community Strategy and other Council policy documents

The Council's Community Strategy, and specifically the objective to secure sustainable regeneration as set out in Action Plan 6 is supported by the preferred option.

Issues and Options Sustainability Appraisal:

Responses supported the preferred option. There was support for both options. One response wanted to undertake a design award for a new Lee Gate Centre.

What alternatives were considered and why they were rejected.

Option 2 was dismissed as design advice is considered to be adequately covered in other development control policies and design guidance for shopfronts and centres which fall in Conservation areas are also covered in supplementary planning guidance. It should be noted that there are limited development sites within the Downham area and therefore the preparation of a design guide for the area would have limited implementation.

3.3.5 BOUNDARY ALIGNMENT

Should the existing boundary for the District Centres in Lewisham be modified?

The Options

Two options were put forward as part of the issues and options consultation.

- 1. Retain the boundaries as currently indicated in the UDP.
- 2. Modify the district centre boundary with alternative configurations.

The Preferred Option (Downham, Lee Green, and Sydenham)

The preferred option is to proceed with option 1 for the District centres of, Downham, Lee Green and Sydenham and to proceed with option 2 for the District Centres of Blackheath Deptford, Forest Hill and New Cross.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

Both options support PPS6 which states that local planning authorities should define the extent of the town centre on the proposals map (Para 2.16) which the preferred option will achieve. The town centre boundary specifically supports London Plan policies 3D.1, 3D.2 and 3D.3.

Community Strategy and other Council documents

The Council's Community Strategy, and specifically the principles to foster enterprise and sustainable business growth, and secure sustainable regeneration (housing, transport and environment) as set out in Action Plans 4 and 6 which support the preferred option.

In light of the recent Local Centres Survey undertaken since the Issues and Options consultation, it is evident that the New Cross district centre and the New Cross Gate local centre are located within close proximity. This is reflected in the fact that the Council employs one town centre manager to cover both areas. To enhance this area and enable development to be focused on serving local community needs it is considered beneficial to join the centres into a larger district centre.

The consultation raised a suggestion to expand the Deptford town centre boundary to the north to include both sides of the High Street.

Issues and Options Sustainability Appraisal There was support for both options.

What alternatives were considered and why they were rejected.

No alternative alignments were proposed for the District Centre boundaries of Blackheath,
Downham, Forest Hill, Lee Green, and Sydenham.

The Preferred Option (Blackheath)

The preferred option is to proceed with option 2 and modify the boundaries of the Blackheath centre to incorporate all of the land owned and occupied by Network Rail (4). Another site to the north east boundary seeks inclusion into the town centre boundary as the proposed area serves a town centre function (3). As well as this site a representation calls for the removal of two residential sites within the town centre boundary which do not contribute to the role and function of a town centre (1 & 2). See Figure 1.

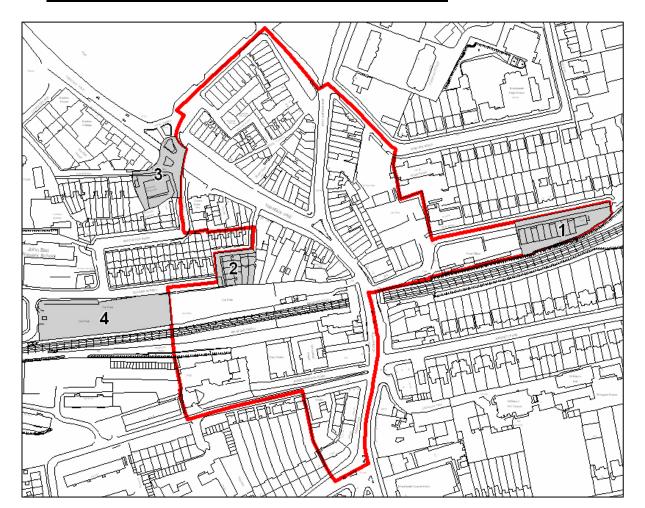


Figure 1. Proposed additions and deletions to Blackheath

Issues and Options Sustainability Appraisal

There was support for an option to modify the boundary by excluding the residential area to the east and west of the site.

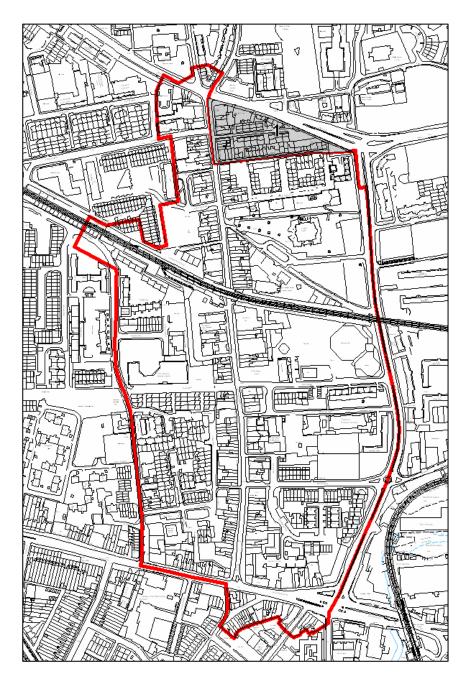
What alternatives were considered and why they were rejected.

Consideration has been given to modifying the alignment of the district centre boundary, however, for implementation purposes it is considered most appropriate that the boundary follow road layout and therefore has been retained as is existing, rather than excluding the residential portion on the fringe of the centre.

The Preferred Option (Deptford)

The preferred option is to proceed with option 2 to modify the boundary of the Deptford Town Centre boundary to include a cultural area, and an additional parcel of land to the north of the boundary to fortify and improve the quantum of retail within the town centre (1) as detailed in Figure 2.

Figure 2. Proposed additions and deletions to Deptford



Issues and Options Sustainability Appraisal:

The issues and options report details option 1 and 2 as equally sustainable which both benefit the vitality and viability of Deptford.

What alternatives were considered and why they were rejected.

Option 1 was dismissed as the proposed boundary provides a more coherent town centre.

The Preferred Option (Forest Hill)

The preferred option is to proceed with option 2 and modify the boundary of Forest Hill district centre as the residential area to the north west is wholly residential and

representations suggest that this site (1) does not contribute to the role and function of the Forest Hill town centre. See Figure 3.

Figure 3. Proposed additions and deletions to Forest Hill

Issues and Options Sustainability Appraisal

The issues and options report details option 1 and 2 as equally sustainable which both benefit the vitality and viability of Forest Hill.

What alternatives were considered and why they were rejected.

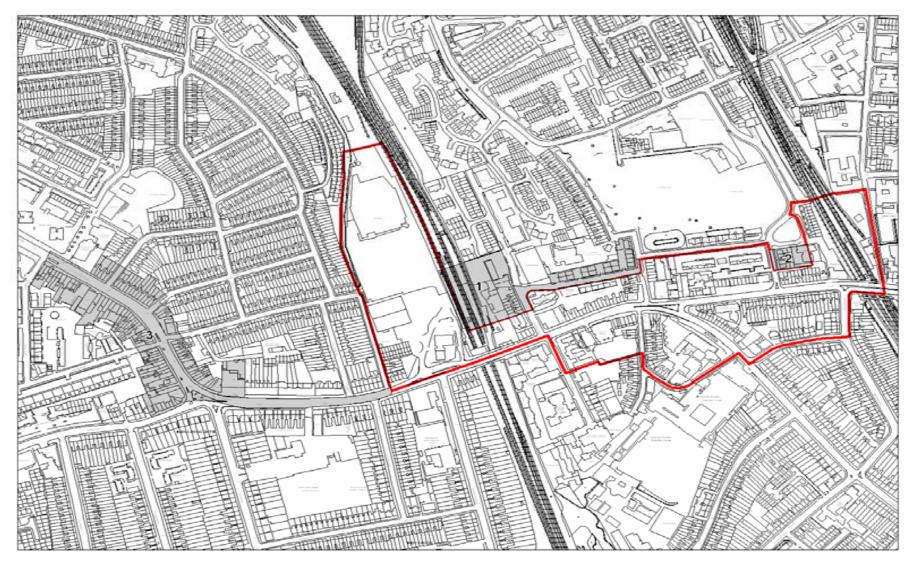
Consideration has been given to retaining the existing alignment of the district centre boundary, however, this residential element of the town centre does not fulfil the role and function of a town centre and should be taken out so that future policy can be more effective.

The Preferred Option (New Cross)

The preferred option is to proceed with option 2 and modify the boundaries of the New Cross centre to incorporate a site between New Cross Gate station and 267 New Cross Road and 17 – 25 Goodwood Road to allow a mix of retail, B1 offices, residential and community facility (1), part of the hostel site was found within the town centre boundary and attributed it to

some confusion, as such the new boundary encompasses the hostel and a row of houses which front Pagnell Street (2). The New Cross Gate Local shopping centre has been thriving as a local centre and competes very well with the existing New Cross District Centre. In light of its success, a suggestion about combining the two centres was put forward (3). See Figure 4.

Figure 4. Proposed additions and deletions to New Cross



Issues and Options Sustainability Appraisal

There was support for an option to modify the boundary by excluding the residential area to the north.

What alternatives were considered and why they were rejected.

Consideration has been given to modifying the alignment of the district centre boundary, however, for implementation purposes it is considered most appropriate that the boundary follow road layout and therefore has been retained as is existing, rather than excluding the residential portion on the fringe of the centre.

Draft Policies

RTC 1 Principles for Retail development and other Town Centre Use (Excludes Lewisham and Catford Town Centres)

Proposals for retail development and other key town centre uses will be determined on:

- 1. An assessment of need for the development in the format proposed.
- 2. Identification of the appropriate scale of the development in relation to the retail hierarchy set out in CP 30.
- 3. Application of the sequential test to site selection.
- 4. Assessment of the impact of the development on existing centres in Lewisham, the East London sub region and neighbouring centres, including the cumulative impact of recent and committed development sites in the locality. This applies to proposals which would have a gross floorspace in excess of 2500 square metres.
- 5. The effect on amenities of adjoining property and/or residential occupiers.
- 6. That the location is easily accessible and well served by a choice of means of transport.

Edge of centre retail, leisure, office, employment and community schemes will need to demonstrate that they can effectively integrate with existing frontages.

Planning obligations may be sought in pursuant to this policy.

RTC 2 Types of uses in Core, Non- Core and Other shopping Areas (Excludes Lewisham and Catford Town Centres)

Changes of use from Class A1 (Retail) will be acceptable within designated shopping areas where A1 usage is greater than 70% in the Core and 50% in Non- Core and does not separate retail units by more than 12metres or 3 A1 uses together (whichever is the greater), unless an applicant can demonstrate that the proposal would enhance the character, vitality and viability of the centre and would not adversely affect the retail function as set out in CP 30 of the Core Strategy.

The following uses are considered acceptable in principle at ground floor level:

Core: Class A1 shops,

A2 Banks and Building Societies,

A3 Restaurants

In Non- Core Shopping Areas, in addition to the uses defined for Core, the following uses are also considered acceptable in principle at ground floor level:

Non Core: A4 Public Houses (Pubs) and Bars

Class A5 Hot food Takeaway

Community Services, including GP surgeries, Veterinary Surgeries,

Dentists and other similar uses. Launderettes and Amusement centres

Other: Notwithstanding the uses acceptable in Core and Non Core shopping Areas, applications for development or change of use which involves the loss of A1 units will normally be acceptable provided:

- 1. It does not harm the amenity of adjoining properties
- 2. It does not harm the local distinctiveness, vitality and viability of the centre as a whole.
- 3. That in the case of a change of use to residential use that the frontage for shoppers is not unreasonably interrupted.

Proposals for the change of use into A3, A4 or A5 will be assessed in conjunction with RTC 5.

The proposal should improve the shopping range, quality and function of the Shopping Area and the retail centre as a whole.

Proposals amounting to more than 1000 square metres gross floorspace within the town centre boundaries must be accompanied by a Green Travel Plan.

3.3.6 LOCAL SHOPPING CENTRES AND PARADES

There are many local shopping centres and parades within the Borough which are defined as Neighbourhood Centres, Local Centres, Local Parades and Corner shops within the retail hierarchy (See CP 30) a group of at least four continuous shops. The size, range, function and character vary between each centre.

Role And Function

The main function of the local shopping centre or parade is to provide for the day to day needs of local residents (small scale convenience goods) within easy walking distance and to supplement the facilities located in larger shopping centres such as that found within the Major and District Centres. It is considered important to maintain local shopping centres and parades to ensure that the less mobile members of the community have access to a range of shops. The council does acknowledge, that in the past it has not always been possible to retain all of the shops in the Borough especially where demand is insufficient to ensure economic viability. In such circumstances consideration has been given to a change of use to residential, providing that this does not adversely impact on the viability and vitality of the surviving retail uses.

The Options

Three options were put forward as part of the issues and options consultation:

- The role and function of local shopping centres and parades is to provide for the daily needs for goods and services for the surrounding local community. This role should be maintained, enhanced and where possible further encourage this local role and function.
- 2. Maintain the current level of flexibility for the change of use.
- 3. Plan for the decline in unsuccessful centres. Planning policies could address decline in some centres. This information would be formulated for each individual centre and based on local circumstances.

The Preferred Option

The preferred option is to proceed with option 1.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option supports the objectives of PPS6 to promote and enhance existing centres, by focussing development in such centres and encouraging a wide range of services in a good environment which is accessible to all, as well as supporting London Plan policies 3D.1, 3D.2 and 3D.3.

Community Strategy and other Council policy documents

The Council's Community Strategy and specifically the objectives to foster enterprise and secure sustainable regeneration is supported by the preferred option.

The Council has undertaken a health check survey of the Neighbourhood centres and will continue to monitor the health of these centres.

Issues and Options Sustainability Appraisal:

Responses favoured both options 1 and 3.

What alternatives were considered and why they were rejected.

Options 2 and 3 were dismissed as they are not in keeping with the National and regional guidance and the focus on maintaining and enhancing the role and function of these centres.

Vitality And Viability

Ensuring town centre vitality and viability is a key objective for the Council and is in keeping with the national policy direction of PPS6. Vitality and viability can primarily be achieved through planning for the growth of existing retail and town centre areas and promoting and enhancing existing centres. There are various elements which can have an effect on the vitality and viability of neighbourhood centres and this includes accessibility to the centre, ensuring people are able to quickly and easily achieve their needs within the centre, as well as a pleasant shopping environment.

The Options

Five options were put forward as part of the issues and options consultation.

- 1. Encouraging a safe, clean and inviting shopping environment.
- 2. Seeking to maintain a healthy supply of local shops providing the necessary daily goods and services or plan to contract the shopping function in declining centres.
- 3. As is current practice, in cases where a shop within a local parade is no longer viable should alternative uses be considered to provide/ensure interaction with the street?
- 4. A combination of the above options which can be used to maintain, enhance or otherwise, the vitality and viability of the neighbourhood centres.
- 5. A combination of the above options which can be used to maintain, enhance or otherwise, the vitality and viability of the neighbourhood centres.

The Preferred Option

The preferred option is to proceed with option 2.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option supports the objectives detailed in the National Guidance PPS6 to promote and enhance existing centres, by focussing development in such centres and encouraging a wide range of services in a good environment which is accessible to all. In addition the preferred option is supported by London Plan policies 3D.1, 3D.2 and 3D.3.

Community Strategy and other Council Documents

The Council's Community Strategy and specifically the objectives to foster enterprise and secure sustainable regeneration as set out in Action Plans 4 and 6 is supported by the preferred option.

Issues and Options Sustainability Appraisal:

There was support for options 2 and 4. A comment was made that the change from retail to residential uses was not supported.

What alternatives were considered and why they were rejected.

The preferred option is a combination of elements of the alternative options.

Draft Policy

RTC3 Local Shopping Centres and Parades

The Council will maintain and enhance the Local Shopping Centres and Parades existing strengths in providing convenience goods and services for a balanced, sustainable and liveable community. New development will need to ensure good design and accessibility.

The Council will grant planning permission involving the change of use from Class A1 in a Local Shopping Parade or as a corner shop, provided the new use would contribute towards preserving or enhancing the local character, vitality and viability of the parade.

In the case of a change of use the following factors will be taken into consideration:

- (a) the availability of alternative shopping facilities within a comfortable walking distance (approximately 400 metres)
- (b) the number and type of units within the parade, the vacancy rate and the length of time a unit has been vacant
- (c) any harm to the amenity of adjoining properties
- (d) the proposed use maintains an active street frontage to contribute to the vitality and viability of the parade and
- (e) the design of the proposal is in keeping with the surrounding street frontage and makes a positive contribution to the streetscape.
- (f) that Class A5 (Hot food Takeaway) uses do not cumulate to a level which would harm the viability and vitality of the Local Shopping Centre or Parade.

Planning obligations may be sought in pursuit of this policy.

3.3.7 OUT-OF-CENTRE PROPOSALS

Within the Borough the retail parks at Bell Green and Bromley Road are classified as out-of-centre retail parks. Retail parks comprise a collection of three or more outlets, usually large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods catering mainly for car-borne customers.

Purpose built retail park premises provide a range of goods not always available in town centres. However, the location of such outlets outside the town centre should be seen as a last resort. Out-of-centre proposals can have an impact on the efficiency and effectiveness of town centre. Existing town centres are generally established shopping areas and are usually well served by public transport. Therefore the out-of-centre proposal should compliment and not compete with retail uses located within the town centres.

The Options

Two options were put forward as part of the issues and options consultation.

- 1 The Sequential Test can be used to guide the location of any out-of-centre development.
- 2. Current Planning Policy sets guidance for developments, based on the above sequential test, which are greater than 1000sq m of gross floor space. Is this threshold appropriate?

The Preferred Option

The preferred option is to proceed with option 1.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

The preferred option is in accordance with PPS6 and supports the London Plan policy 3D.2, which seeks town centre development or edge of centre development as a priority rather than out-of-centre proposals.

Community Strategy and other Council documents

The Council's Community Strategy and specifically the objectives to foster enterprise and secure sustainable regeneration as set out in Action Plan 6 is supported by the preferred option.

Issues and Options Sustainability Appraisal:

There was support for the preferred option from the consultation undertaken.

What alternatives were considered and why they were rejected.

The alternative option is incorporated within the preferred option.

Draft Policy

RTC4 Out-of-centre proposals

The Council will grant planning permission for additional retail use, and in particular substantial additional retail development, in the major and district town centres as defined on the Proposals Map. If no suitable, viable or available sites are present in these locations then edge of centre sites should be considered, followed only then by out of centre sites in locations that are or can be made accessible by a choice of means of transport.

Proposals for substantial retail provision on the edge or outside of these Centres 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 recent or committed developments would not demonstrably harm the vitality and viability of an existing shopping centre
- (d) 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 using public transport
- (e) the proposal is not on land allocated for employment purposes on the Proposals Map and for which a demand can be established and
- (f) if planning permission were to be granted then a s106 may be negotiated for relevant improvements.

Developments of 1000m² gross floor space or more will normally be considered substantial.

Proposals amounting to 1000m² gross floor space or more will require a Green Travel Plan.

3.3.8 POLICIES RELATING TO ALL RETAIL AND TOWN CENTRES

RTC5 Cultural Quarters

Class A3 (Restaurants), Class A4 (Pubs and Bars) and other appropriate assembly and leisure uses (Class D2) will be deemed acceptable in the following Core, Non Core and Other Shopping Areas where they will not be subject to separation or percentage constraints in order to encourage the formation of cultural quarters. These areas include:

- Site 15 of the Site Allocations Document (Octavius Street and Deptford Station, Deptford High Street)
- 2. Site 13 of the Site Allocations Document (Giffin Street, Deptford High Street)

Proposals will be looked at favourably as long as the preferred use does not harm the residential amenity of neighbours and that every precaution is taken in order to avoid disturbance by noise, obtrusive fumes and smells, traffic generation and litter.

RTC6 Evening and Night Time Economy

Within the District centres but outside the Core shopping areas, proposals for recreational and leisure facilities including facilities for arts culture and entertainment pubs, bars, nightclub, bingo halls and any other evening associated use will be acceptable in principle in non core and other shopping areas subject to the following considerations

- 1. Proximity to Residential areas, Schools, Places of Worship and similar sensitive users.
- 2. The appropriateness of the scale of the development for the location.
- 3. The cumulative impact and level of disturbance
- 4. The nature of the activity, including the impact of the proposed hours of operation
- 5. The appropriate provision of ventilation and external ducting.

RTC7 Mixed Use Development

The Council will favourably consider new development in the town centre to provide a mix of uses, including independent residential accommodation with separate access. Exceptions may be considered where it can be demonstrated that the site is not suitable to accommodate a mix of uses.

Planning obligations may be sought in pursuant to this policy.

RTC8 Sui Generis Use

Sui Generis uses and other uses not mentioned in policies RTC 1-7 will be acceptable in principle in non core and other shopping areas subject to the following considerations

- Proximity to and impact on Residential areas, Schools, Places of Worship and similar sensitive users.
- The appropriateness of the scale of the development for the location.
- The cumulative impact and level of disturbance
- The nature of the activity, including the impact of the proposed hours of operation
- The appropriate provision of ventilation and external ducting.

RTC9 Change of Use of Public Houses

The Council will only permit the change of use of public houses to other uses where it has been demonstrated that there are alternative remaining public houses in the vicinity and that the potential for alternative community use of the building has been exhausted.

3.4 OPEN SPACE AND BIODIVERSITY

Overview

Open space and Biodiversity is important for both community well being and environmental health. Many people regard the provision and quality of open space in their area as an integral part of what constitutes the quality of life. Open space can play an important role in attracting and retaining residents as well as businesses, and therefore plays an active role in contributing towards socio-economic regeneration and sustainable neighbourhoods. Well designed and managed open spaces can help bring communities together and provides a place to meet and recreate.

As the basis for the development of the adopted **Open Space Strategy for Lewisham 2005-2010**, the Council undertook an audit of existing open spaces over 0.3ha including quantity, quality, use, function, facilities and accessibility. Should you wish to view the Open Space Strategy for Lewisham 2005-2010 it is on the Council's website.

Issues and Options Consultation

The main responses from the Issues and Options consultation were:

- Open space should be protected and not encroached on by development and recognised their importance as pockets of open space in a built environment.
- The focus group sessions provided an opportunity to probe more closely into how open space impacted on residents quality of life. Members commented upon the importance of clean air, a clean environment and the fact that they are a free facility and the visual importance of open spaces. Even those group members who did not use parks and open spaces acknowledged their value and recognised that they have a positive impact upon the quality of life of local communities.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF. The main areas in which open space and biodiversity supports the borough's Community Strategy are to protect and enhance the boroughs open space and improve the quality and accessibility of open space to all. This would work towards sustaining the health and wellbeing of local people, develop cultural vitality by building on Lewisham's distinctive cultures and diversity and also to aid in securing the sustainable regeneration of Lewisham with regard to the environment.

Open Space and Biodiversity Issues

3.4.1 Protection and Enhancement of Open Space and Avoiding Inappropriate Development

The pressure to build new houses in Lewisham will increase over the next 5 years with an estimated 9,750 homes being needed by 2016. Although Brownfield sites should be the preferred land use for development, there is becoming increasingly more strain on open space in the borough. Coupled with this pressure, there has also been a growing level of concern about the state of the health of the borough and in particular the increased levels of obesity amongst school age children. The need therefore to provide good quality accessible spaces and facilities for outdoor sport and recreation is vital to help alleviate the problem.

Analysis of the function of open space and feedback from local users suggests a need for quality outdoor sports facilities.

It should be noted that human interaction on open space areas can inevitably result in adverse effects on the environmental qualities of the borough's open spaces. It is therefore important that such activities are managed in such a way that avoids, remedies or mitigates these effects. The same can be said of adjoining properties and development and the potential for spill over effects onto areas of open space.

The Options

Eight options were put forward as part of the issues and options consultation.

- 1. The Council to refuse planning permission for developments within any open space that is likely to result in an adverse effect on its use, management, amenity or enjoyment.
- 2. The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a visual relationship with any open space that is likely to result in an adverse effect on its use, management or enjoyment.
- 3. The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a visual relationship with Metropolitan Open Land (MOL) that is likely to result in an adverse effect on its use, management or enjoyment.
- 4. The Council to protect all MOL and POS from inappropriate built development but adopt a more permissive approach to development on public open space (POS)/ Urban Green Space (UGS) based on criteria such as:
 - Design
 - Scale
 - Visual Amenity
 - Views
 - Light
- 5. Requirement that any new development sets aside 1.7ha/1000 head of population average of Open Space.
- 6. Development contributions to acquire land or cash for future acquisition of land, or for maintenance of nearby open space, relative to the increase in population pressure.
- 7. Council to negotiate with landowners to open up private open space to allow public access.
- 8. An assessment of the availability of brownfield land to be designated for open space regeneration.

The Preferred Option

The preferred option is to proceed with a combination of options 1,2, 3 and 5.

Draft Policies

OS1 Metropolitan Open Land and land adjacent to Metropolitan Open Land

The open character of Metropolitan Open Land (MOL) in Lewisham, as shown on the proposals map, will be preserved. Any development proposal on land fringing, abutting or otherwise having a visual relationship with MOL will be assessed on the basis of their impact on visual amenity, character or use of the MOL. Planning permission will be granted only for appropriate development or change of use where this preserves the open nature of the land.

The following uses of land may be appropriate within MOL in Lewisham:

- (a) Private and public open space, playing fields and golf courses;
- (b) Agriculture, woodlands, (including the creation of new native woodland), and orchards;
- (c) Rivers canals, reservoirs, lakes and other open water;
- (d) Allotments and nursery gardens;
- (e) Cemeteries and associated crematorium; and
- (f) Nature conservation.

The Council will be supportive of proposals that enhance these uses and will only permit the limited extension of buildings within MOL where this would not result in a disproportionate addition over and above the size of the original building. Improved public access to appropriate land uses in MOL will be acceptable where it does not conflict with other sustainability objectives as set out in CP 21 of the Core Strategy.

OS2 Public Open Space and Urban Green Space (Open Environment)

The Council will resist inappropriate development on the areas of Public Open Space (POS) or Urban Green Space (UGS), as shown on the Proposals Map. Inappropriate development includes:

- (a) development that would result in the loss of or damage to POS or UGS; and or
- (b) development that adversely affects the amenity, open character or appearance of the POS or UGS through inappropriate scale.

Development that would result in the loss of or damage to sites that have not been designated as either POS or UGS but are nonetheless valuable locally will also be resisted as inappropriate.

As an exception to the above, some development on POS or UGS maybe permitted if it comprises:

- (a) small and unobtrusive development that is ancillary to the open space use and enjoyment of the land; or
- (b) development that facilitates or enhances public access to Urban Green Space; or
- (c) development that makes provision nearby for replacement open space of equal or better quality and size.

In identifying Public Open Space, the following uses should be applied to this policy: Sports and Recreation fields, Burial Spaces, Historic Parks, Gardens and Landscapes and any other space which breaks up the built form.

In exceptional circumstances, the Council may enter into s.106 negotiations to secure off-site provision of open space where no other suitable site can be found.

OS 3 World Heritage Site Buffer Zone

The Council will give special consideration to developments within the declared World Heritage Site Buffer Zone as delineated on the Proposals Map, that may be visible from within the World Heritage Site. New developments on land within the buffer zone will be required to have no adverse visual impact on and enhance the World Heritage Site affecting the land within the Borough.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

PPG 9 seeks to promote sustainable development as well as conserving, enhancing and restoring the diversity of wildlife as well as contributing to urban renaissance.

PPG17 focuses on quality improvements to existing Public Open Space and acknowledges that while there is a need to increase the amount of open space in some areas this is not

that while there is a need to increase the amount of open space in some areas this is not feasible, and in such cases improvements to the quality of open space are also very important.

The London Plan's objective to "Accommodate London's growth within its boundaries without encroaching on open spaces" is supported by policies 3D.7 Realising the value of open space, 3D.9 Metropolitan Open Land – where Boroughs should maintain the protection of MOL from inappropriate development, 3D.10 Open Space Provision in UDPs, 3D.11 Open Space Strategies and 3D.12 Biodiversity and nature conservation. Policy 4B.13 seeks to protect and safeguard London's World Heritage sites.

The East London Sub-Regional Development Framework supports the protection of public open space through Actions 4D and 4E.

Consistency with other Council documents

The draft policy is in line with the Council's adopted Community Strategy which seeks to secure the Council's objective of sustainable regeneration of Lewisham – its housing, transport and environment.

What alternatives were considered and why were they rejected Responses supported a range of the above options with options 1, 2, 3 and 8 being particularly popular.

The proposed draft policy is a series of policies for considering the protection and enhancement of various types of open spaces as well as avoiding inappropriate development. As such the options have been incorporated into the draft policies, while others such as the reference to developer contributions have been addressed in other sections of the preferred options.

It was considered that Option 4 would be inconsistent with National (PPG17) and Regional (Policy 3D.10 of the London Plan) guidance. It would also not be the most sustainable option.

Option 6 was considered to be inappropriate and would not conform to government guidance as detailed in planning circular 05/05 'planning obligations'. As such, this option cannot be explored.

Option 7 was considered to be too onerous on the remit of the Councils statutory duties. Although some sites cannot be readily accessible to the public, these sites still have an intrinsic value with regard to the visual amenity and character of the environment and may offer habitats to the borough's wildlife. As such this option was disregarded.

Option 8 was considered to be innovative in its approach to providing more open space for the borough. Brownfield land has been earmarked through National (PPS3) guidance and Regional (Objective 6) policy

3.4.2 Dealing with Open Space Deficiencies

Consultation into what people value most about living in Lewisham has revealed that open space plays a large role in a community's satisfaction with their living and working environment. As identified in the research for the Borough's Open Space Strategy and based on the National Playing Fields Association 'Six Acre Standard', Lewisham is currently deficient in the amount of open space and accessibility necessary for the growing population, relative to other Borough's and policy guidance. The issue is therefore what we can do to address the current inadequacies and prevent further loss of this valuable community resource. The Borough has recently been awarded seven Green Flags, ranking it first (with Haringey) within London. This illustrates that not only quantity of open space is important but also the quality and accessibility of those open spaces.

One of the principle roles of the planning system with respect to Open Space is to protect its current use from inappropriate development. The Council recognises its role in ensuring development does not adversely affect the value of existing Open Space and that measures are taken to ensure areas of deficiencies are minimised and remedied.

The Options

Three options were put forward as part of the issues and options consultation.

- 1. The Borough adopts a target of 1.7ha/1000 head of population average of Open Space by 2006 and 1.75ha by 2010 over the whole of the Borough.
- 2. Borough maintains 1.67ha/1000 head of population average, with no aim to increase.
- 3. Target of 1.7ha/1000 head of population average of Open Space set over areas of deficiency as defined in UDP maps by 2006 and 1.75ha by 2010.

The Preferred Option

The preferred option is to adopt option 2. This option seeks to address concerns from the Open Space needs survey and In light of the proposed GLAs housing target figures, there is a need to ensure that any target rate is within the realms of achievability. The housing target figures are likely to add an additional 20,000 people to the borough over the next 10 years. This increase will have a significant impact on the per capita figures for open space within the Borough. In considering the alternative approaches to open space and the amount of land which is required, the alternative options were not considered feasible, or attainable in

light of the significant amount of land which would be required to achieve the proposed targets.

It is desirable to set a 'local target' for the amount of public open space per 1000 head of population. The current level is 1.67ha of POS per 1000 head of population is a realistic target and falls inline with the forecasted increase in the borough population. The radial maps, Figures 5 and 6 illustrate the areas of deficiency for Public Open Space, both at Local (400m) and District park (1200m) levels. In a heavily urbanised inner London Borough such as Lewisham, it is difficult to make provision for new public open space, but not impossible. The Sundermead housing scheme has made it possible to plan for a new town centre park, which on completion, together with the proposed new town centre interchange open space, will reduce the area of deficiency at a Local Park level in the town centre.

Figure 5. Area of Local Park Deficiency

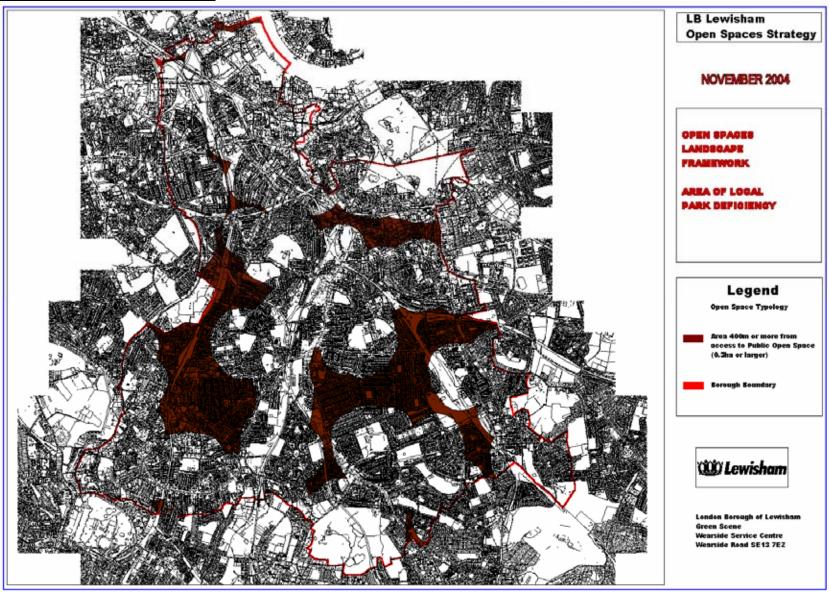
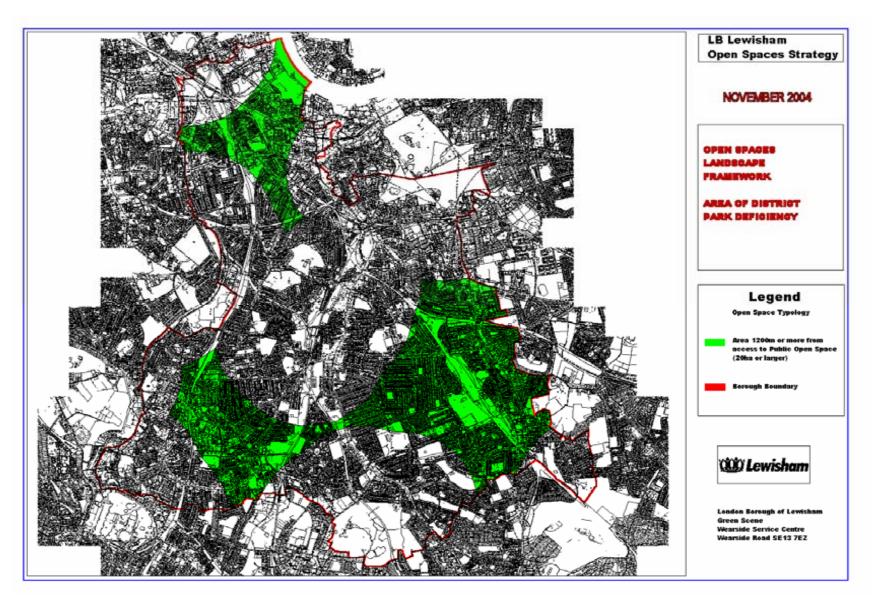


Figure 6. Area of District Park Deficiency



Draft Policy

OS 4 Open space deficiencies

Proposals for large residential schemes will be acceptable in principle, providing that the provision of open space would not fall below 1.67ha/ per 1000 population and would be sited close to public transport links where feasible. If the proposal would be sited in an area of Open Space deficiency or would create an area of deficiency through the development, proposals should provide good quality open space commensurate to the proposed development and its occupiers.

In all major developments there is a requirement to provide public open space. In areas identified as being deficient in Public Open Space and shown on Figures 5 and 6 the Council will concentrate its efforts to negotiate with developers for the provision of new open spaces as part of new housing schemes. In cases where this is not practicable, off site provision to improve existing open space or public access to existing open spaces may be considered as outlined in CP 22 of the Core Strategy.

In pursuant of this policy, planning obligations may be sought to ensure compliance with this policy.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

PPG17 focuses on quality improvements to existing Public Open Space and acknowledges that while there is a need to increase the amount of open space in some areas this is not feasible, and in such cases improvements to the quality of open space are also very important.

The London Plan's objective to "Accommodate London's growth within its boundaries without encroaching on open spaces" is supported by policies 3D.7 Realising the value of open space, 3D.9 Metropolitan Open Land – where Boroughs should maintain the protection of MOL from inappropriate development, 3D.10 Open Space Provision in UDPs, 3D.11 Open Space Strategies and 3D.12 Biodiversity and nature conservation.

The East London Sub-Regional Development Framework supports the protection of public open space through Actions 4D and 4E.

Consistency with other Council Documents

The draft policy is in line with the Council's adopted Community Strategy which seeks to secure the sustainable regeneration of Lewisham – its housing, transport and environment.

What alternatives were considered and why they were rejected

Of the 14 responses, 10 were in support of the option to average 1.7ha per 1000 population with an aim to increase this provision. Only one response supported maintaining the existing level of provision, while three supported the option to increase the average in areas of deficiency.

Option 1 is the current aspiration for Lewisham. However, in order to seek to realistically improve the provision of open space it was considered that this option would not be achievable in its approach and not flexible enough to change with new pressures. As such this option was dismissed.

Option 3 seeks to address the constraints that are experience today but does not take into consideration the fact that areas that are not deficient in open space could become deficient within the plan period. This option proved unsustainable and would not be flexible to deal with changing circumstances. There was very little response to this issue. As such, this option was also dismissed.

3.4.3 Open Space Provision – Quality and Maintenance

Open spaces provide for a large variety of uses. For many, their primary function is to serve the recreational needs of the community. Active and usable open space often requires facilities and structures to support and promote this use, such as toilets, walkways, interpretation material, seating, tables, playgrounds and sports fields. There is also a need for such areas to be located and designed to meet the needs of the community.

It has been widely recognised that improving the state of our parks is vital to delivering an urban renaissance and restoring pride in our neighbourhoods. Lewisham has made a start in the right direction and was awarded seven green flags in 2006. The green flag awards are a measure of the quality of the Borough's open spaces. Respondents from the open space strategy voted litter bins, dog bins, access for wheelchairs and pushchairs, children's play areas and toilets as the top five most important facilities in parks and open spaces.

Well designed and managed spaces can help bring communities together, provide a place to meet and recreate. Poor maintenance and management or park spaces on the other hand can deter people from visiting and using and appreciating these spaces. Barriers to participation can include fear of crime/ feeling unsafe, traffic, lack of facilities / things to do, mess (e.g. dog mess and rubbish) and access for all. However, 45% of park users cited fear of crime when specifically asked about the main barrier to visiting local open spaces.

Considering that the borough is deficient in open space provision, it is even more important that the open spaces we actually do have are of the best quality, safe and are made accessible to all who choose to use it. Developments that include housing provision should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs.

The Options

Three options which were put forward as part of the issues and options consultation.

- 1. Adopting the Actions documented in the Open Space Strategy for Lewisham 2005-2010.
- 2. Setting quality standards and criteria to assess current situation and priorities for improvements and on-going public consultation to gauge satisfaction with open spaces.
- 3. In areas of deficiency the Council will not permit development which will adversely affect accessibility to open space.
- 4. In areas of deficiency the Council will seek section 106 development contributions to improve quality of public open spaces facing the increased pressure.

The Preferred Option

The preferred option is to proceed with a combination of the options but with the main emphasis taken from the recommendations and actions identified in the Open Spaces Strategy for Lewisham 2005 -2010.

Draft Policies

OS 5 Open space quality and maintenance

Proposals for new open space or development on existing open spaces should be of a good quality design which has regard to creating a safe and accessible design and where applicable allow for the creation of habitats for biodiversity purposes. For schemes which involve housing, play and informal recreation facilities should be provided within the scheme. For developments which involve the creation of open space, a landscape and maintenance statement should accompany planning applications.

In pursuance of this the policy, planning obligations may be sought to ensure compliance with this policy.

OS 6 Trees

The Council will seek to prevent the loss of trees of amenity and nature conservation value when granting planning permission and, where appropriate, make Tree Preservation Orders for their protection.

Reason for the Preferred Option

Consistency with national and regional planning guidance

PPG 9 seeks to promote sustainable development, as well as conserving, enhancing and restoring the diversity of wildlife as well as contributing to urban renaissance.

PPG17 focuses on quality improvements to existing Public Open Space and acknowledges that while there is a need to increase the amount of open space in some areas this is not feasible, and in such cases improvements to the quality and access of open space are also very important.

The London Plan's objective to "Accommodate London's growth within its boundaries without encroaching on open spaces" is supported by policies 3D.7 Realising the value of open space, 3D.9 Metropolitan Open Land – where Boroughs should maintain the protection of MOL from inappropriate development, 3D.10 Open Space Provision in UDPs, 3D.11 Open Space Strategies, providing safe, good quality, well designed, secure and stimulating play and recreation provision is reinforced through policy 3D.11i Children and Young People's play and Informal recreation strategies and 3D.12 Biodiversity and nature conservation. The Mayor's London Tree and Woodland Framework objectives are to protect, maintain and enhance trees and woodland.

The East London Sub-Regional Development Framework supports the protection of public open space through Actions 4D and 4E.

Consistency with other Council documents

The draft policy is in line with the Council's adopted Community Strategy which seeks to secure the sustainable regeneration of Lewisham – its housing, transport and environment.

What alternatives were considered and why were they rejected
There was support for all of the options put forward. In particular support was received for adopting the recommendations and actions of the Open Spaces Strategy for Lewisham 2005-2010.

The preferred policy incorporates all of the proposed options.

The sustainability appraisal indicated that Option 2 proved the most desirable option on an equal par with Issue 1. Although an annual audit of the quality of open spaces is undertaken, a quality standard has not been adopted. Until a standard has been adopted, this option cannot be taken forward.

Option 3 is now covered in Policy OS4 and would be a repetition. As such this option was not considered.

Planning Obligations can only be sought in relation to the planning application it serves and not for the benefit of the Council as a whole. Planning Circular 05/2005 sets out the framework for planning obligations. As such, Option 4 was dismissed.

3.4.4 Protection and Enhancement of Natural Habitats and Biodiversity

Open space areas provide the majority of the Borough's most significant and whole habitats for flora and fauna species. Open spaces can also provide important linkages between significant ecological sites. When living in such a dense urban environment, it is important that these areas are protected, not only for their intrinsic flora and fauna values, but in recognising that healthy functional ecosystems can contribute to a better quality of life and a sense of well-being for those who live and work in urban areas.

Activities on open space and adjoining areas can potentially result in adverse effects on the environmental qualities of the site. It is therefore important that such activities are managed in such a way that primarily avoids, remedies or mitigates these effects.

Many sites of local nature conservation importance have been given designations by local authorities. These sites often accord people in the community the only opportunity of direct contact with nature. Lewisham has a long tradition of conserving and enhancing its natural environment. The Lewisham Biodiversity Partnership was established in 1999 to develop an action plan for the borough's wildlife and natural environment and follows current guidance taken from the UK Biodiversity Action Plan, and the Mayor's Biodiversity Strategy. The partnership aims to bring in local expertise and enthusiasm working towards being at the forefront of local conservation. The document sets out the biodiversity of all plants, animals and species to be promoted and given priority to its longevity.

The Options

Six options were put forward as part of the issues and options consultation.

1. Adopt target that the existing 3.5% of public space actively managed as natural habitat should increase to 4.5% by 04/05, 5% by 05/06 and to 5.5% by 06/07.

- Subject to other planning considerations, developments seeking to conserve or enhance the biodiversity and geological conservation interests of the area and/or the immediate locality should be permitted.
- 3. Encourage naturalisation of waterways and esplanade areas in consultation with the Environment Agency.
- 4. Support for developments using green building methods.
- 5. Where development will result in adverse impacts on biodiversity and conservation, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.
- 6. Council will need to be satisfied that any reasonable alternative sites for development have been fully considered.

The Preferred Option

The preferred option is to proceed with a combination of options 2, 5 and 6. this was due to the high level of response during the issues and option consultation, these options were sustainable when amalgamated together and the Open Space strategy outlines similar requirements in the Recommendations.

Draft Policy

OS7 Biodiversity

Subject to other planning considerations, developments seeking to conserve or enhance the biodiversity and geological conservation interests of the area and/or the immediate locality should be permitted. The Council will seek:

- To protect, manage and enhance biodiversity;
- Protection of Sites of Importance for Nature Conservation and Green Corridors;
- To resist proposed development which would harm the population or conservation status of protected and priority species;
- Biodiversity enhancements in new developments;
- Promotion of public access and appreciation of nature; and
- A justification that no alternative sites were available to avoid any impact on habitats.
 Only in this instance will the Council seek appropriate mitigation methods and/or other compensatory tools prior to, during and thereafter for so long as the development remains in existence, where development will cause harm to biodiversity.

Planning obligations may be sought where proposals would have a direct impact on sites near or within a site of importance for nature conservation.

Reasons for the Preferred Option

Consistency with National and regional planning policy

PPG 9 seeks to promote sustainable development, as well as conserving, enhancing and restoring the diversity of wildlife as well as contributing to urban renaissance.

The London Plan requires the protection and the improvement of access to nature on the strategic network of land for biodiversity (policy 3D.12), which is reflected in the wildlife sites protected in the Lewisham UDP (see figure 7). This network serves to protect nature for its own sake and to maintain and improve access to nature for Lewisham's residents.

The East London Sub-Regional Development Framework supports the protection of public open space through Actions 4D and 4E.

Consistency with other Council documents

The draft policy is in line with the Council's adopted Community Strategy which seeks to secure the sustainable regeneration of Lewisham— its housing, transport and environment, to sustain and improve the health and wellbeing of local people and also improve the effectiveness, efficiency and sustainability of local public services; optimise investment in infrastructure and improve the management of assets.

The Council is currently in the process of preparing a Biodiversity Action Plan for the borough and it is anticipated that 'A Natural Renaissance for Lewisham' will be consulted upon in the near future. However, in preparation of the Preferred Option consideration has been given to the initial draft document and the stated objectives for biodiversity within the Borough.

What alternatives were considered and why they were rejected
There was support for all of the options put forward. In particular support was received for adopting the recommendations and actions of the Open Spaces Strategy for Lewisham 2005-2010.

The preferred policy incorporates all of the proposed options.

Although, the aspiration for this policy was included within the final development control policy, it was deemed very difficult to be able to monitor this policy. As such, Option 1 was dismissed.

Option 3 is covered in OS8 and as such is not included within this issue

Option 4 is covered in a cross cutting issue and is featured within the Spatial (Core) policies. Therefore it was considered a repetition and not needed as a development control policy.

3.4.5 Protection and Enhancement of Open Space Links and Corridors

Open spaces can provide important linkages between significant ecological sites. Such linkages serve to enhance ecosystem connectivity and the biodiversity of an area by providing wildlife corridors that encourage movement of plants and animals between ecological sites and into the urban environment. Such linkages need to be carefully managed and of a sufficient width to serve their purpose.

Activities on land adjoining these areas can potentially dilute the environmental qualities and effectiveness of links and corridors. It is therefore important that such activities are managed in such a way that avoids, remedies or mitigates these effects. Links and corridors can also provide unique and valuable recreational opportunities for the community and public as a whole, while providing participants an opportunity to experience a more natural environment

over a decent length journey. An example of this in the London Borough of Lewisham is the high-use South East London Green Chain, most of which is protected as MOL.

The Council will actively embrace the Green Grid principles as set out in the East London Sub-Regional Development Framework and the draft Further Alterations to the London Plan in order to secure further improvements to the Borough's open space network.

Lewisham's rivers (a short section of the Thames, and longer stretches of the Ravensbourne and its tributaries the Pool, Quaggy and Spring Brook) provide important linear features which can form the basis for wildlife corridors, as well as the Waterlink Way (see policy OS 9) and the Thames path (see Policy U 28), and are important to sustain biodiversity. In line with the Blue Ribbon Network, all development on or adjacent to the Blue Ribbon Network must respect its water location and should particularly include a mix of uses appropriate to the water space including public use open spaces. The Council considers that buffer zones around watercourses can help to maintain the character of rivers and provide refuges for wildlife, as well as pleasant and practical recreational routes. Any proposals should also consider the objectives of the EU Water Framework Directive (Directive 2000/60/EC) which seeks to deliver long term protection of the water environment and the improvement of ground and surface water quality.

The Options

Three options were put forward as part of the issues and options consultation.

- Where development will result in adverse impacts on links identified in the UDP maps, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.
- Council will only permit development in areas identified in the planning proposal maps as 'Waterlink Way' or Green Chain if it enhances the biodiversity or recreational use of the links.
- 3. Council will encourage proposals for naturalisation of waterways in conjunction with the Environment Agency.

The Preferred Option

The preferred option is a combination of the three options which were put forward as part of the issues and options consultation exercise.

Draft Policies

OS 8 South East London Green Chain

The main open spaces that form the South East London Green Chain are protected as MOL. These spaces will be promoted and managed in order to enhance their role as a local and regional outdoor recreational resource. The Council will explore any ways that could strengthen the role of the SELGC within the borough.

OS 9 River Corridors and the Waterlink Way

The Council will safeguard the Rivers and the proposed route of the Waterlink Way as shown on the Proposals Map. It will seek the reduction of impact on the natural environment and habitats by the most acceptable route. Through agreements with developers of sites within and adjoining the route some or all of the following elements, as appropriate, will be achieved:

- (a) to provide additional open space;
- (b) to improve the quality of the open spaces in Waterlink Way and the links between them, notably footpaths and cycleways;
- (c) to improve the course and appearance of the waterways and public access to them for passive and active recreation:
- (d) to create wildlife habitats and to enhance the existing nature conservation value of the waterways.
- (e) to ensure that a minimum buffer zone of 8 metres where feasible, of reserved soft landscaped land is maintained alongside the river confluence.

The Council will, where appropriate, protect land within and adjacent to River Corridors and the Waterlink Way by seeking planning obligations where development would compromise its strategic role.

OS 10 Green Corridors

The Green Corridors identified on the Proposals Map are protected for their nature conservation and informal recreation value. Planning Permission will only be granted for developments within Green Corridors that enhance these roles.

Planning obligations may be sought where proposals would have a direct impact on sites near or within an identified green corridor.

Reasons for the Preferred Option

Consistency with national and regional planning guidance

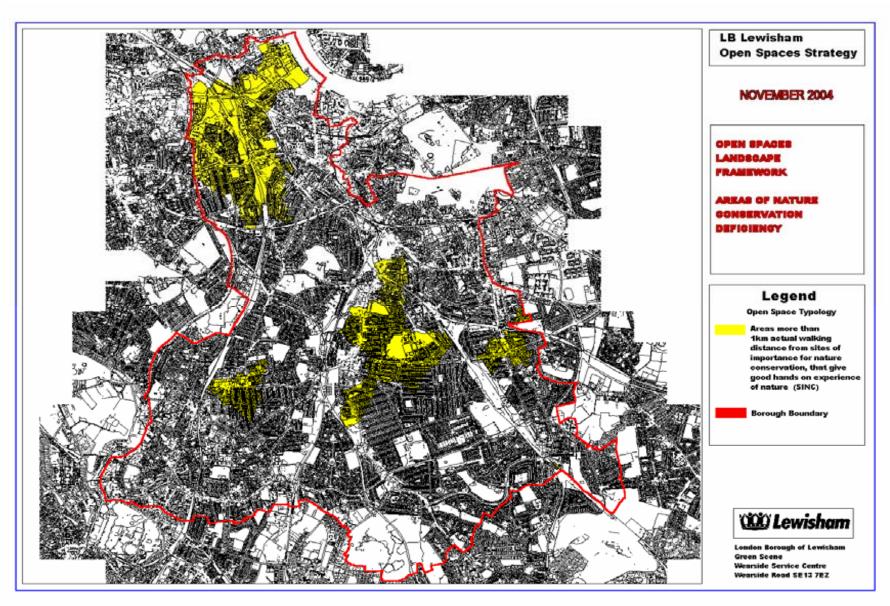
The proposed draft policy is specifically supported by the following London Plan Policy, 3D.12 relating to biodiversity and nature conservation. The GLA has also produced a 'Best Practice Guidance: Development plan policies for Biodiversity', which steers Local Planning Authorities in determining policies addressing biodiversity and nature conservation.

Consistency with other Council documents

The Council is currently in the process of preparing a Biodiversity Action Plan and it is anticipated that 'A Natural Renaissance for Lewisham' will be consulted upon in the near future. However, in preparation of the Preferred Option consideration has been given to the initial draft document and the stated objectives for biodiversity within the Borough.

What alternatives were considered and why there were rejected Responses supported for all 3 options. The alternative options incorporate aspects of all the options provided in the Issues and Options document.

Figure 7. Sites of Nature Conservation Deficiency



3.5 SUSTAINABLE ENVIRONMENT

Overview

Town planning has come a long way from dealing with purely land use based issues to integrating environmental, and socio-economic considerations which provides the basis for creating a sustainable environment and society. The preferred options presented focus on the impact of development on the environment, and more specifically the energy used in the operational phase of the development, efficient use of water resources, flood risk, effects on air quality, noise and light pollution, construction waste and aggregates, and sourcing construction materials from sustainable resources.

A summary of the responses received from the issues and options consultation, the relationship to the community strategy, and the preferred options are detailed below:

Issues and Options consultation

The main responses on the sustainable environment topic from the Issues and Options consultation were:

- The mix of responses from the consultation suggested that a firm policy on energy efficiency was preferred, which also allowed flexibility for the developers.
- Responses supported an increase in the use of renewable energy schemes within Lewisham and complete support for the assessment criteria set in option 3.
- Respondents were aware of the risk of river and tidal flooding in Lewisham
 and thought that the Council should take a proactive approach in preparing
 for the risks associated with climate change. A majority of the respondents
 thought that we had proposed the best options to deal with flood hazards and
 climate change.
- Most of the respondents found that air pollution was a big problem in Lewisham and that the presented options were the best ones to deal with this issue
- All the respondents thought that the proposed options were the best to deal with contaminated land and hazardous substances.
- Half of the respondents were neutral about the standard of the river water quality in Lewisham, whilst some thought it was 'great' or 'quite poor'. Most of the respondents were very supportive of the question of whether the Council should take a pro-active approach to ensure the sustainability of water resources. A majority of respondents thought we had proposed the best options to achieve this.
- A few respondents found that noise was a 'Big problem' in Lewisham, though
 most thought it was a 'Minor problem'. When asked where they thought the
 noise came from the main sources were noisy neighbours, Traffic and Rail,
 whilst some mentioned Business operations, Car stereos and Aircraft noise.

- When asked whether the proposed options were the best to deal with noise and light effect most respondents were not supportive.
- A majority of the respondents thought that the proposed options were the best to deal with the sustainable use of building materials and aggregates.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF.

Action Plan 6 – Secure the sustainable regeneration of Lewisham as a place – its housing, transport and environment discusses the need to ensure that the built environment is of a high quality and improve the quality and sustainability of the local environment. The LDF can help deliver the LSP by contributing to:

- Increasing energy efficiency in buildings and sustainable construction methods
- Improving air quality by suitably locating development
- Reducing noise and light pollution
- Reducing the use of natural resources such as water
- Ensuring safe location of developments in flood risk areas and contaminated land
- Reducing waste reduction from homes and businesses

SUSTAINABLE ENVIRONMENT ISSUES

3.5.1 Improving the use of energy

Fossil fuels are by far the most commonly used source of fuelling transport and generating heat and electricity. These however have a residual effect leading to emissions of pollutants that can be harmful to health and contribute to global warming. Reducing vehicle journeys, conserving of energy, and generating heat and electricity by mean of renewable energy technologies are ways of reducing these emissions. The UK Government has emphasised the need to reduce greenhouse gas emissions from the built environment with planning policy as one of the key drivers in this process.

The Options

Three options were put forward as part of the issues and options consultation:

- 1. To encourage energy efficiency and integrate landuse and travel, reducing the need to travel by car
- 2. Energy efficiency criteria on design, orientation and specifications for new building developments
- 3. Require an assessment of energy demand for major developments

The Preferred Option

The preferred option is a rewording of option 3 building on recent changes to planning legislation and building regulations.

Draft policy

SE1 Energy efficiency for residential development

The Council will require all new residential dwellings to achieve an energy efficiency rating and an environmental (CO₂) impact rating of 'A' as part of the Energy Performance Certificate. The Council will expect this to be supported by a commitment to achieve this rating at the detailed design stage.

Reasons for Preferred Option

Consistency with national and regional planning guidance
DTI Energy White Paper (2003): defines a long term strategic vision for the UK
energy policy and emphasizes the need to reduce energy consumption. This is
supported in the UK Climate Change Programme (2006) as a reduction in energy will
support the UK targets for reducing CO₂ emissions. PPS1 Sustainable development
also recognises energy efficiency as a major component to create a more
sustainable environment to reduce the dependency on fossil fuels.

The Building Regulations provide the basic standards for construction in England. Part L (energy) of the regulations have been updated to put more stringent requirements on energy efficiency in developments. The Housing Act 2004 will require a Home Information Pack (effective June 2007), including an energy performance certificate, with the sale of any property. The certificate gives an energy efficiency rating and advice on further improvements that can be made. All properties will have a certificate when they are constructed, sold or let by 2009. The draft policy has been developed around this requirement to achieve an energy efficiency standard above the building regulations across all new developments. The policy will ensure that these considerations are incorporated at the design stage rather than being retrofitted.

The draft policy supports London Plan Policy 4A.7 (Energy efficiency and renewable energy), 4A.8 (Energy assessment), the Mayor's Energy Strategy and its objectives of reducing CO₂ emissions, improving energy efficiency and increasing the proportion of energy used generated from renewable sources. The draft policy also supports the Mayor's Air Quality Strategy. Mayor's Climate Change Strategy, SPG Sustainable Design and Construction

Community Strategy and other Council documents

The draft policy supports Lewisham's Energy policy and the Lewisham Climate
Change Strategic framework.

What alternatives were considered and why they were rejected
Option 1 was dismissed as it was too broad and has hence been adapted into a core
policy. Option 2 was seen as being too prescriptive. In light of continuous changes in
technology it was considered appropriate to take an approach that allows some
flexibility for developers to choose their measures provided that the specified
standard is met.

3.5.2 Providing for renewable energy

The UK government has a target of reducing CO₂ emissions by 20% by the year 2020 and generating 10.4% of electricity from renewable sources by 2010. In the bid towards sustainable development there will be a need for providing energy via decentralised energy systems, such as Combined cooling heat and power system (CCHP), or small scale renewable technologies. A requirement for provision of energy from renewables has already been incorporated in local planning legislation in some boroughs.

Options

Three options were put forward as part of the issues and options consultation.

- 1. Require all new major developments to meet 10% of energy demand through renewables.
- 2. Require all new major developments to meet 10% of energy demand through renewables, where feasible.
- 3. Support the development of stand alone and roof mounted renewable energy schemes where feasible.

Preferred Option

The preferred option is to proceed with options 1 and 3 with modifications.

Draft Policies

SE2 Energy efficiency and renewables for major developments

The Council will require proposals for major developments with a floor space of over 1000m², or ten or more residential units to:

- a) Provide an assessment of energy demand and the expected energy and CO₂ emissions savings from energy efficiency and renewable energy measures incorporated into the development, including the feasibility of CHP/CCHP and community heating systems.
- b) Achieve a 3* rating under the Code for Sustainable Homes or BREEAM 'Very Good rating'. The Council will expect this to be supported by a commitment to achieve certification under an appropriate scheme at the detailed design stage.

c) To incorporate on-site renewable energy equipment to reduce predicted CO₂ emissions by at least 20%. Applicants will be required to provide a full feasibility study of all renewable technologies considered.

The above measures may be secured through planning obligations or by condition.

SE3 Stand alone and roof mounted renewable energy

Installation of stand alone and roof mounted renewable energy schemes will be permitted provided that the following criteria are met:

- a) the impact of noise and vibration from mechanical components is considered satisfactory;
- b) the visual amenity from public viewpoints is safeguarded;
- c) there is no adverse impact from reflected light and shadow flicker on adjoining land-uses: and.
- d) any impact on open space areas / conservation areas / historic buildings/ general character of the area, is considered satisfactory.

Reasons for Preferred Option

Consistency with national and regional planning guidance

Provision of onsite renewable energy is an important measure to encourage sustainable forms of energy production in the borough and is specifically encouraged in the PPS 22 Renewable energy, which states that 'Local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments'.

The preferred option is consistent with the UK Climate Change Programme, the DTI Energy White Paper, Renewables Obligations, and the Mayor's Energy Strategy 'Green light to green power', and is in general conformity with the London Plan Policy 4A.9 (providing for renewable energy). London Plan Policy 4A.7 (Energy efficiency and renewable energy), 4A.8 (Energy assessment). The preferred options support the Mayor's Energy Strategy and it's objectives of reducing CO₂ emissions, improving energy efficiency and increasing the proportion of energy used generated from renewable sources. The options also support the Mayor's Air Quality Strategy. Mayor's Climate Change Strategy, SPG Sustainable Design and Construction

The Mayor for London has currently proposed a reduction of 20% of CO₂ through onsite renewable energy in new developments, in the London Plan Draft Alteration, which will be out for public examination in June 2007. Lewisham Council has decided to follow suit and has set a similar requirement.

Community Strategy and other Council documents

The option supports Lewisham's Energy policy and the Lewisham Climate Change Strategic framework.

What alternatives were considered and why they were rejected

Option 1 is considered to be too restrictive. Planning authorities should not reject
planning applications simply because the level of output is small. Options 2 and 3 will
permit developers to incorporate a range of renewable energy in development
proposals. Option 3 gives guidance for stand alone and small scale renewable
technologies which can be applied to all developments provided the assessment
criteria are met. PPS 22 Renewable energy states that 'Small-scale projects can
provide a limited but valuable contribution to overall outputs of renewable energy and
to meeting energy needs both locally and nationally.

Other planning reasons

Option 2. also called the 'Merton Rule' after being pioneered by London Borough of Merton, has been adopted by a number of boroughs across the UK as part of their strategy towards contributing to the national CO₂ reduction target.

Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1, which came out for consultation 13 December 2006, states: "development plan documents (DPDs) will set policies on the provision of low carbon and renewable sources of energy to provide the platform necessary for securing and complementing the increasingly high levels of energy efficiency required by Building Regulations. This provision should be "significant", so as to reflect the full potential of local opportunities but without undermining the new development needed in communities."

The draft policy has been written in conformity with that proposed by the GLA in the draft further alterations to the London Plan.

Where the installation of renewable technologies are unviable because of design or site constraints the developer will be asked to provide an equivalent reduction in CO₂ off site. The requirement for this can be negotiated via a s106 agreement.

The Code for sustainable Homes, point b) in draft policy SE2, refers to a new national standard for sustainable design and construction of new homes. The 'Building a Greener Future: Towards Zero Carbon Development' paper uses the Code as a tool towards reducing the carbon footprint of residential developments. By integrating elements of this voluntary Code into new homes and obtaining assessments against the Code, developers will be able to obtain a 'star rating' for any new home which will demonstrate its environmental performance. The Code is based on BREEAM (Building Research Establishment Environmental Assessment Method) which is a recognised assessment method for evaluating the overall performance of a building in terms of management, energy use, health and well being, pollution, transport, land use, ecology, water, and materials. A level 3* rating is broadly equivalent to an EcoHomes 'Very Good' rating. The code ensures that a certain environmental standards will be achieved with a degree of flexibility for the developers.

3.5.3 Flood risk and SUDS

The consequences of climate change for London are likely to be erratic weather events, warmer wetter winters and hotter drier summers. This could lead to an increase in the frequency and severity of flood risk. It will be necessary to take precautionary measures by minimising the impact of and adapting to these changes.

All forms of flooding and their impact on the natural and built environment are material planning considerations. The main implications in Lewisham relate to development within the Thames Gateway area, where significant areas are shown to be within an area at risk from flooding. This includes areas adjoining the rivers Thames, Pool, Quaggy, Ravensbourne and Kidbrook. A substantial part of the flood risk areas are located in the north of the borough and along the smaller rivers that lead into the Thames.

The Options

Seven options were put forward as part of the issues and options consultation.

- 1. Sequential test applied to development in zone 3 flood risk areas.
- 2. Minor extensions to households in flood hazard areas.
- 3. Risk based approach for development in flood risk areas.
- 4. Balanced management of social and economic needs and flood risk.
- 5. Requirements for flood protection and mitigation measures in flood zone 3 via s106 agreements.
- 6. Mitigating measures accompanied by development proposal to be subject to sustainability appraisal.
- 7. Use of sustainable urban drainage systems (SUDS).

The Preferred Options

The preferred option is to proceed with all options, albeit in a modified form.

Draft Policies

SE4 Flood risk

Planning applications for development proposals of 1ha or greater in flood zone 1 and all proposals for new development located in flood zones 2 and 3, as identified in the flood risk figure 8 may be required to submit a site-specific flood risk assessment with the planning application.

The suitability of the proposed development will be determined by applying the sequential test, and where necessary the exceptions test, as outlined in PPS25.

Where necessary the applicant will be required to contribute to the cost of works to provide, improve and maintain flood defences via planning conditions or s106 agreements

Reasons for Preferred Option

Consistency with national and regional planning guidance

Planning Policy Statement 1: Delivering Sustainable Development sets out the Government's objectives for the planning system, and how planning should facilitate and promote sustainable patterns of development, avoiding flood risk and accommodating the impacts of climate change. The Planning Policy Statement Planning and Climate Change1, provides expanded policy on planning's contribution to mitigating and adapting to climate change.

The draft policy is consistent with PPG 25 Development and Flood Risk, which aims 'to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. Where new development is, exceptionally, necessary in such areas, policy aims to make it safe without increasing flood risk elsewhere and where possible, reducing flood risk overall';

The draft policy is also in general conformity with the London Plan Policy 4C.6 Flood plains, 4C.7 Flood defences, map 4C.2 Indicative flood risk areas. The policy is also consistent with the Draft Further Alterations to the London Plan New Policy 4A.5iii Adaptation to Climate Change, Policy 4A.5v Flood Plains, Policy 4A.5vi Flood Defences and flood risk management and map 4A.2 Indicative flood risk areas. The policy is also consistent with the Thames Gateway Strategy Flood Risk Assessment report.

Consistency with other Council documents

The option supports the Lewisham Climate Change Framework.

What alternatives were considered and why they were rejected

The options were found to be too prescriptive and were combined into the preferred option. The options were dismissed in favour of one policy on flood risk which retains the recommended method of flood risk evaluation. More emphasis has been given to sustainable use of water and application of SUDS as this will assist in minimising the effects of flooding across the borough.

The Council will prepare a Strategic Flood risk assessment (SFRA) which will form the basis for applying the sequential test and where necessary the exceptions test to site allocations, as detailed in PPG25.

The Council will determine the scope of the site specific flood risk assessment (FRA). The following process may be applied to undertake a FRA:

Level 1 **Screening study** to identify whether there are any flooding or surface water management issues related to a development site that may warrant further consideration. This should be based on readily available existing information, including

the SFRA, Environment Agency Flood Map and Standing Advice. The screening study

will ascertain whether a FRA is required.

Level 2 **Scoping study** to be undertaken if the Level 1 FRA indicates that the site may lie

within an area that is at risk of flooding or that the site may increase flood risk due to increased run-off. This study should confirm the sources of flooding which may affect the site. The study should include the following:

- an appraisal of the availability and adequacy of existing information
- a qualitative appraisal of the flood risk posed to the site, and potential impact of the development on flood risk elsewhere
- an appraisal of the scope of possible measures to reduce the flood risk to acceptable levels.

The scoping study may identify that sufficient quantitative information is already available to complete a FRA appropriate to the scale and nature of the development.

Level 3 **Detailed study** to be undertaken if the Level 2 FRA concludes that further quantitative analysis is required to assess flood risk issues related to the development site.

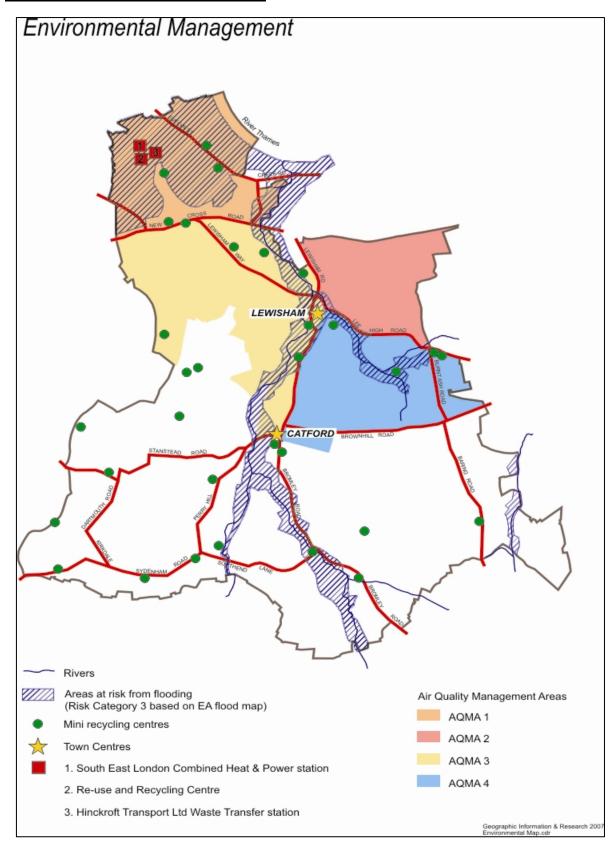
The study should include:

- quantitative appraisal of the potential flood risk to the development
- quantitative appraisal of the potential impact of development site on flood risk elsewhere
- quantitative demonstration of the effectiveness of any proposed mitigation measures.

Source: Practical guide to PPS25 – a living draft

Minor developments will not be required to provide an FRA.

Figure 8. Environmental Management



3.5.4 Water

Water quality and water resources

The rivers of Lewisham i.e. the Pool, Quaggy, Ravensbourne and Kid Brook provide habitats for a number of species and are a valuable amenity for the local environment. Surface run-off from the built environment can have a negative impact on the river water quality and the biodiversity. Further, inadequate development through increasing demand on the water supply and sewage infrastructure can deplete the water reservoirs.

Sustainable Surface Water Drainage

Urban areas like Lewisham have a high percentage covered in non-permeable surfaces, such as tarmac and buildings. Rainfall and flood water is thus less able to permeate through the hard surface to replenish the ground water and keep the soil moist. The impact of surface run off and flash flooding are thus exacerbated due to lack of permeability and are likely to cause more damage to buildings and infrastructure.

The Options

Four options were put forward as part of the issues and options consultation.

- 1. Protect and improve river water quality.
- 2. Protect and conserve water supplies with sustainable use of water resources.
- 3. Water and sewerage infrastructure capacity.
- 4. Development of water supply and waste water facilities.

The Preferred Options

The preferred option is to proceed with options 1,.2 and 3.

Draft Policies

SE5 River water quality

The Council will seek to protect and enhance Lewisham's Blue Ribbon Network to provide a safe, healthy and attractive river environment. The Council will oppose proposals that are likely to lead to a reduction in water quality, unless suitable mitigational measures are provided.

SE6 Water resources

The Council will protect and conserve water supplies in order to secure Lewisham's long term needs.

Planning permission will only be granted for development which increase the demand for off-site service infrastructure (water supply, sewer drainage and treatment) where:

- (a) Sufficient capacity already exists, or
- (b) Extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.

When there is a capacity problem and improvements in offsite infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.

SE7 Sustainable urban drainage systems (SUDS)

The Council will require applicants to demonstrate how surface water run-off is managed as close to its source as possible. The use of sustainable urban drainage systems will be encouraged for all developments. Preference will be given to proposals that ensure that adequate water resources are available and that:

- Minimise the use of treated water
- Maximise rainwater harvesting opportunities
- Incorporate grey water recycling systems.

The Council will require proposals for developments on brownfield sites with a floor space of 1000m², or ten or more residential units to demonstrate through calculations that the rate of run-off of surface water from the site is less than the conditions before development.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The preferred options are consistent with the PPS 23 Planning and Pollution Control and in general conformity with the London Plan Policy 4C.1 (The Strategic importance of the blue ribbon network), Policy 4C.2 (Context for sustainable growth), Policy 4C.3 (The natural value of the blue ribbon network), Policy 4C.8 (Sustainable drainage), Policy 4A.11 (Water supplies), Policy 4A.12 (Water quality), Policy 4A.13 Water and sewerage infrastructure). The policies are also consistent with the Draft Further Alterations to the London Plan Policy 4A.5vii Sustainable drainage, Policy 4A.11 Water supplies, Policy 4A.12 Water quality. Policy 4A.13 Water and sewerage infrastructure.

Consistency with other Council documents

The preferred options support the Lewisham Biodiversity Action Plan, and the Lewisham Climate Change Framework.

What alternatives were considered and why they were rejected
The options presented were complimentary rather than distinct options. This was considered to be a suitable approach as the provision of adequate sewage infrastructure and protection of local water resources are considered as a basic right rather than an option. The public consultation during the issues and options stage was an opportunity to provide input into the further development of these issues into policies. The options were reworded and expanded in light of current planning guidance and the results from the public consultation.

3.5.5 Air Quality

Poor air quality has a negative effect on human health and the environment. The main sources of air pollutants come from the burning of fossil fuels, mainly contributed by transport and commercial and industrial activities. Air quality becomes a major issue in a densely populated and built up area like London due to the low dispersion levels of the pollutants. Lewisham has air quality management areas where exceedences are higher than acceptable levels and it is therefore important to manage development in such areas.

The Options

Two options were put forward as part of the issues and options consultation.

- 1. Development and Air Quality assessments.
- 2. Air Quality assessment criteria.

The Preferred option

The preferred option is to proceed with a combined option which sets the criteria for air quality assessments in a single policy.

Draft Policy

SE8 Air Quality

The council will require development proposals to take air quality into account with other material considerations, and provide an air quality assessment where considered appropriate by the Council. Where necessary the development proposal will be required to provide appropriate mitigation measures which will be implemented by a condition or planning obligation (s106 agreement).

Reasons for Preferred Option

Consistency with national and regional planning guidance

The draft policy is consistent with PPS 23 Planning and Pollution Control, the National Air Quality Strategy, and in general conformity with the London Plan Policy 4A.6 Improving air quality. The draft policy consistent with the Mayor's Air Quality Strategy.

Consistency with other Council documents

The preferred options support the Lewisham Air Quality Action Plan

What alternatives were considered and why they were rejected

The preferred option is to take a flexible approach which will allow air quality issues to be determined on a site specific basis. A full air quality assessment will be required where a development has a significant impact on air quality. The level of significance can be determined by a number factors, including:

- Locality of the development, including any new areas of relevant exposure to pollutants.
- The length of time and scale of the demolition/construction phase.

- Likely increase in traffic levels (either 500 vehicles per day or 100 per hour)
- Increase in pollutant emissions by 5% or above on roads with an Annual Average Daily Traffic (AADT) of 10,000.
- The size of the development (number of units etc)
- Increase in HGV movements (20 + per day), such as lorry parks, bus stations etc.
- New industrial developments and waste transfer stations
- New rail, road, signalling, bridge, tunnel, airport or river development
- Cumulative impacts of adjacent sites

Development proposals will be required to incorporate appropriate mitigation measures where regarded necessary by the Council. These measures can be required via s106 agreement or as a planning condition.

3.5.6 Contaminated Land

Contaminated land can have a potentially adverse effect on human health and the environment. Government guidance makes clear that it is the developer's responsibility to remediate potentially contaminated land; enforced through planning conditions and building control. Development plans need to continue to ensure that planning policy takes a risk based approach to the redevelopment of contaminated land.

The Options

Three options were put forward as part of the issues and options consultation.

- Developments on contaminated land and proposals for remedial treatment by developers
- 2. Criteria for polluting developments
- 3. Storage of hazardous substances

The Preferred Option

The preferred option is to proceed with option 1 with modifications.

Draft Policy

SE9 Development on Contaminated Land

Where development is proposed on contaminated land, or land suspected of being contaminated, the Council requires the developers to:

- (a) submit a contaminated land survey
- (b) identify any contamination of land and provide details of proposed remedial treatment which can be required as a condition on a planning application or through a planning obligation.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The preferred option is consistent with the Planning (Hazardous substances) Act 1990 (c.10), PPS 23 Planning and Pollution Control and in general conformity with the London Plan Policy 4A.16 (Bringing contaminated land into beneficial use).

Part IIA of the Environmental Protection Act (1990) created a new statutory regime for the identification and remediation of land defined as being contaminated. The local authorities have been given a leading role in this process whereby they are required to take a strategic approach to identify and apportion liability for remediation of contaminated land to the appropriate person/s.

Consistency with other Council documents

The preferred option supports the Lewisham Contaminated Land Strategy.

What alternatives were considered and why they were rejected

Options 1 was modified as the preferred options and options 2 and 3 were dismissed.

Option 2 highlights concerns over a specific type of development but with general issues that can be determined through other policies such as air quality and urban design and conservation. There is hence no need for a policy on polluting developments. Option 3 is more appropriately dealt with by national and local guidance on public health and safety and is not within the remit of planning policies.

3.5.7 Noise and Light Effect

The impact of obtrusive noise and light (glare or direct light) can have a serious detrimental effect on the amenities enjoyed in residential areas. At the strategic level, main roads, major rail corridors and aircraft are the principal sources of ambient noise. The planning system should have a mitigational approach to activities that have the potential to cause nuisance to residents and businesses. Where a new development is proposed it should also ensure that the development is separated from major noise sources. Where this is not possible design of the building envelope should at all times ensure a good internal noise environment.

The Options

Two options were put forward as part of the issues and options consultation.

- 1. Minimisation of noise
- 2. Light attenuation

The Preferred Options

The preferred option is to proceed with both options.

Draft Policies

SE10 Noise and vibration

Where noise/vibration-sensitive development is proposed close to an existing source, or when a noise/vibration generating development is proposed, a detailed noise/vibration impact survey will be required outlining attenuation measures.

SE11 Light attenuation

Proposals for light-generating development, floodlights or otherwise obtrusive lighting will be required to be accompanied by a detailed light-impact survey outlining attenuation measures.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The preferred option is consistent with PPG 24 Planning and Noise and in general conformity with the London Plan Policy 4A.14 (Reducing noise).

Consistency with other Council documents

The preferred option supports the Code of Practice – control of pollution & noise from demolition and construction sites.

What alternatives were considered and why they were rejected

The options are complimentary rather than being comparable. This was considered to be a suitable approach at the issues and options stage as the reduction of noise and light pollution are considered to be a basic requirement to provide a liveable environment in a densely populated area such as Lewisham.

3.5.8 Sustainable use of Building Materials and Aggregates

Developments require a large quantity of building materials which put pressure on the demand for natural resources. A reduction in materials use would be beneficial for the environment.

The Options

One option was put forward as part of the issues and options consultation.

1. Efficient use of building materials and recycling of aggregates.

The Preferred Options

The preferred option is to modify the option put forward.

Draft Policy

SE12 Construction waste and aggregates

Developments will be required to demonstrate how they will contribute towards reducing and recycling construction, demolition and excavation waste. Information on these measures must be submitted with an application.

The Council will require that new developments over 1000m², or 10 dwellings should submit and implement a site waste management plan to minimise the disposal of wastes to landfill, by reducing waste of materials on site and promoting reuse, segregation, recycling and composting of wastes that arise. The waste management plan is required to evaluate what level of reuse and recycling is possible and set targets for materials diverted from landfill.

SE13 Construction materials

The Council will require

a) all development proposals to demonstrate how they intend to contribute towards using construction materials from sustainable resources and use

- recycled and reused materials. Information on these will be required to be submitted with the application;
- b) all major developments over 1000m² or 10 dwellings or more, to source at least 10% of the total value of material used from recycled and reused materials;
- developments which require demolition of an existing building will be encouraged to recycle and/or reuse reclaimed materials for the proposed development.

The Developer will be expected to follow the principles and procedures from the ICE Demolition Protocol.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The preferred option is consistent with PPG24 Planning and Noise and in general conformity with the London Plan Policy 4A.2 (Spatial policies for waste management) Policy 4A.3 (Criteria for the selection of sites for waste management and disposal) Policy 4A.5 (Spatial policies to support the better use of aggregates).

Consistency with other Council documents

The preferred option is consistent with the Lewisham energy policy.

What alternatives were considered and why they were rejected

The option has been modified to separate the issues of construction, demolition and excavation waste, and construction materials. These policies should work in symbiosis where the waste resulting from a development can be reused in the construction process. This will reduce the use of new resources and transportation and also create a market for reused and recycled materials.

3.5.9 Hazardous substances

The handling, transportation and storage of hazardous substances can pose as a health and safety risk to people and the natural environment. It is essential that such substances are managed in a satisfactory way to ensure a healthy and safe environment.

The Options

1. Safe storage of hazardous substances

The Preferred option

The preferred option was the retain the option presented.

SE14 Hazardous substances

The Council will require any proposed or existing development containing hazardous substances to be stored in a manner that meets National Regulations, limits the risk to human health and safety and avoids contamination of air, ground and water resources.

Full details of mitigational storage facilities for hazardous substances will be required

before a planning application is considered.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The EU Directive on hazardous substances requires land use policies to take prevention and minimisation of consequences into account, which is also reflected in PPS 12. This policy also takes into account Regulation 6(1)(c)(ii) of the Town and Country Planning Regulations 2000. The draft policy is consistent with PPS23 Planning and Pollution control, and the London Plan Policy 4A.17 (Dealing with hazardous substances).

Consistency with other Council documents

The preferred option is consistent with Lewisham contaminated land strategy (2001), and Health in equalities strategy (2005-2010).

What alternatives were considered and why they were rejected
There was no alternative option presented as the preferred option is a statutory requirement.

3.5.10 Waste

The growth in waste is a national problem. There are a number of factors influencing the growth in waste, including the increase in population and households, greater affluence, changing shopping habits, increases in packaging, and the influence of the 'throw away society'. The cost of managing this waste is increasing and there are demands for it to be disposed of in more sustainable ways. This means that a great proportion of the waste will need to be diverted from landfill by applying the waste hierarchy:

- 1. Reduction
- 2. Re-use
- 3. Recycling &
- 4. Composting
- 5. Energy Recovery
- 6. Disposal

Lewisham is in a better position than many boroughs with respect to the Hierarchy of waste management and the Proximity Principle, in that over 85% of its household waste goes to the South East London Combined Heat and Power (SELCHP) plant, which is located in the Borough. CHP recovery is further up the Hierarchy than landfill disposal. Although the direction of waste management in Lewisham has been primarily set towards disposal through incineration for the next 18 years, progress must still be made so that Lewisham can still meet the challenges of the future.

This issue has been divided into the following sections:

Provision of waste facilities

- Provision of new Waste Management Sites
- Protection of existing Waste Management Sites

Provision of waste facilities

The Options

- 1. Minimise waste and apply the waste hierarchy
- 2. Provide waste storage and recycling facilities for development of 5 units and above(criteria based policy)
- 3. Provide waste storage and recycling facilities for development of 15 units and above (criteria based policy)
- Require all new commercial / business operations demonstrate how waste storage and recycling facilities are to be incorporated onto the site.

The Preferred option

The preferred option is to have a policy for residential developments based on options 2 and 3, and a separate policy for commercial developments based on option 4.

Draft Policies

SE15 Residential waste facilities

The Council will require all new residential developments to provide sufficient waste storage and recycling facilities.

Planning applications for residential developments will consider the following:

- The provision of facilities to recycle or compost household waste by means of a separated dedicated storage space.
- Appropriate siting of waste storage and recycling facilities within the development, visual screening and health and safety precautions.

Requirements for planning obligations will be used in pursuit of this policy

SE16 Waste facilities in commercial and large scale development

The Council will require all new commercial/business operations to provide designated space for waste storage and recycling facilities, and to demonstrate how they will contribute towards reducing operational waste and increasing segregation and recycling of waste.

Applicants proposing large-scale developments or developments that employ or attract a large number of people, such as supermarkets or industrial units, should provide appropriately designed facilities for the collection for recycling or re-use of the waste that they, their customers or they staff generate. Applicants should submit

a comprehensive waste and recycling management strategy.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The draft policies are consistent with PPS10 Planning for sustainable waste management. They are in general conformity with the London Plan policy 4A.2 (Spatial policies for waste management) and the Mayors municipal waste management strategy.

Consistency with other Council documents

The draft policy is consistent with the Lewisham waste management strategy.

What alternatives were considered and why they were rejected

Option 1 was considered to be more suitable as a core policy as it is a strategic option. The criteria based options 2 and 3 apply to residential developments above the stated number of units. The provision of waste storage and recycling facilities is considered to be important for all developments and hence the need for a threshold was considered unnecessary. The size and location of the storage space will be determined via discussions with the municipal waste management department and urban designers to provide the most appropriate facilities for each site, provided that the needs of the residents are met.

Provision of new waste management sites

The Options

- Encourage waste management facilities in northern preferred employment locations
- 2. Encourage waste management facilities in all preferred employment locations
- 3. Criteria for locating waste management facilities
- 4. Encourage recycling points in areas

The Preferred option

The preferred option is a combination of option 2 and 3.

Draft Policies

SE17 Provision of new waste management sites

The Council will consider following criteria when assessing applications for waste management facilities:

Location

- 1. the waste management facility is in a strategic employment area
- 2. it is compatible with adjoining land uses.

- the distance travelled for waste is minimised (particularly through noise sensitive areas) and sustainable modes of transport such as rail and river transport are encouraged
- 4. there is no adverse effects on surface and underground water, nor land stability;
- 5. the facility is not visually intrusive, and has appropriate screening / landscaping;

Conditions

- The applicant will be required to mitigate any adverse effects that the development has on the natural environment and nuisance caused by excessive air pollutants, odour, noise, litter, vermin or birds;
- the applicant will be required to ensure that hours of operation and duration of operations are controlled so as not to disturb neighbours;

Reasons for Preferred Option

Consistency with national and regional planning guidance
The draft policy is consistent with PPS10 Planning for sustainable waste
management. It is in general conformity with the London Plan policy 4A.3 (criteria for
section of sites for waste management and disposal), the Mayors municipal waste
management strategy.

Consistency with other Council documents

The policy is consistent with the Lewisham waste management strategy

What alternatives were considered and why they were rejected

Option 1 was considered to be too restrictive in terms of location of waste facilities.

All of the main waste facilities in the borough are located in the north of the borough, which increases the length of journey taken for people in the south of the borough to reach a recycling facility. A more even spread of facilities would be a more sustainable option, which can be provided by options 2 and 3. Surrey Canal Road and Bromley Road Strategic Employment Locations widen the options for an appropriate waste management site. Option 3 sets the criteria for appropriately locating the waste facilities taking into consideration the impact that such a facility may have on neighbouring or adjoining uses, particularly with regards to residential developments. The preferred option ensures that environmental impacts are minimised.

Protection of waste management sites

The Options

 encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council managed waste management facilities only). encourage retention of existing waste management sites unless appropriate compensatory provision is made (policy applying to council managed waste management facilities and private enterprises).

The Preferred option

The preferred option is option 2 with criteria for strategic employment areas.

Draft Policy

SE18 Protection of existing waste management sites

- 1. The Council will encourage retention of existing waste management sites in Strategic Employment Areas unless appropriate compensatory provision is made (policy applying to council managed waste management facilities, and private enterprises).
- 2. Existing sites in mixed use areas will be relocated within Strategic Employment Areas if a need is identified.
- 3. The council will encourage new, and change of existing, waste management facilities to recycling and reuse facilities.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The draft policy is consistent with PPS10 Planning for sustainable waste management. It is in general conformity with London Plan policy 4A.2i (Existing provision – capacity, intensification, re-use and protection), policy 4A.21iv (Broad locations suitable for recycling and waste treatment facilities). The policy is consistent with the Mayors municipal waste management strategy.

Consistency with other Council documents

The policy is consistent with the Lewisham waste management strategy

What alternatives were considered and why they were rejected

Option 1 was considered to be inadequate as commercial waste management facilities constitute a large proportion of total waste management sites in Lewisham. Waste management is a low value use, and pressure from high value uses such as housing will require some form of safeguarding of these sites from change of use.

The preferred option has been expanded in line with the London Plan which encourages 'green' waste management facilities such as recycling or composting.

3.5.11 Green Roofs

In the UK, the increased pressures on urban land and increased density levels are likely to have adverse impacts on drainage, water abstraction, biodiversity, accessible green space, and local climate conditions. A green roof system can play a positive role in mitigating these impacts and contributing towards an increase in quality of the urban environment. Besides providing additional areas of habitats and increasing biodiversity, green roof systems can increase the life expectancy of a

roofs, act as sustainable urban draining systems by reducing surface run-off, reduce overheating of buildings, and help reduce the heat island effect.

The Options

No options was put forward at the issues and options stage for incorporating green roofs

The Preferred option

The preferred options is a new policy on green roofs

Draft Policies

SE19 Living roofs for biodiversity

The Council will encourage all new developments to incorporate a green/brown roof system. Development proposals, other than minor developments, will be required to provide a statement on the feasibility of incorporating a green/brown roof system at the detailed design stage.

Reasons for Preferred Option

Consistency with national and regional planning guidance

The draft policy is consistent with the Biodiversity Strategy for England, PPS9 Planning for biodiversity and geological conservation: A guide to good practice, The draft policy is in general conformity with London Plan policy 4C.8 (Sustainable Drainage), draft further alterations to the London Plan Policy 4A.2i Sustainable design and construction. The draft policy is consistent with Mayor's biodiversity Strategy, SPG Sustainable Design and Construction.

Consistency with other Council documents

The draft policy is consistent with the Lewisham biodiversity action plan,

What alternatives were considered and why they were rejected

No options were put forward for green roofs at the issues and options stage. A need was identified for having a separate policy on green roofs as it is a cross cutting issue which applies to a number of other issues such as energy efficiency, sustainable urban drainage systems, sustainable design and construction, increasing biodiversity, habitat creation, reducing the heat island effect, and providing additional open space.

The application of green or living roofs in new developments have gained recognition as an important element of sustainable construction practices. The suitability of a chosen green roof system will depend on the design and layout of the development, load bearing capacity of the roof, and local climatic conditions. Developers will be expected to introduce green roof systems that contribute as much as possible to maximise the biodiversity potential and include plant species that are found naturally

complement landscaping on the ground.

in the local environment. The choice of species should as far as possible

3.6 URBAN DESIGN AND CONSERVATION

Overview

These polices are concerned with achieving high standards of design in built development in the borough, and in enhancing the boroughs positive landscape qualities, Good design and an improved environment can contribute to regeneration objectives by attracting business and investment, improving the conditions for people living in the borough, building on the many high quality residential areas of the borough and reinforcing civic pride and a sense of place. Most historic buildings can be put to good use, and are a valuable resource contributing to the prosperity of the local economy, the quality of the local built environment, and to preserving a sense of place and history. Sustainable development implies that emphasis should be placed on conserving and reusing buildings. The River Thames and the Blue Ribbon Network are a neglected landscape and environmental resource and receive special attention.

These policies are also concerned with the sustainable development of sites by ensuring that opportunities for development are maximised, is in easy reach of jobs, transport and other facilities, and helps to accommodate London's growth within its boundaries.

Issues and Options Consultation

The main responses on the Urban Design and Conservation Issues and Options consultation were:

- Concern that increased densities would lead to an overall lowering of environmental and residential quality and would not ultimately be sustainable
- local architectural form was more important than maximising site use,
- a flexible approach to density should be taken
- concerns about high density development in the context of overpopulation and strain on local services
- Importance of maintaining open space as a valuable element
- Suggestions made for new Conservation areas (these can be taken forward outside the LDF process)

URBAN DESIGN ISSUES

3.6.1 DEVELOPMENT IN CONTEXT AND GOOD URBAN DESIGN

New development should be visually and physically compatible with its context. This means that design of development and the types of uses will change according to the context. Lewisham borough has a range of urban environments with different characters requiring different design treatments for new development. Depending on the context, mixed uses (e.g. mixed use commercial and housing) or solely housing may be appropriate. One of the aims of the London Plan (see below) is to develop London sustainably by ensuring new development makes maximum use of the opportunity presented by a site. Development should be located so that it maximises the use of scarce land and is in easy reach of jobs, transport and other facilities, and help, to accommodate London's growth within its boundaries.

In order to be sustainable new development should also provide the following qualities:

- Be well designed, safe and accessible
- Improve the urban design quality and environment of the borough
- Deliver and influence crime prevention
- Design for safety in town centres
- Provide clear public routes and pedestrian access to surrounding facilities

New development should lead to well designed places that are well used and attractive. It should be designed to reduce crime and the fear of crime by maximising surveillance, and be accessible to all. All new development, whether on high profile sites, or in more out of the way locations should contribute to improving the image of the borough, thereby playing a key role in promoting urban regeneration. The consideration of accessible and inclusive environments which are safe and reduce the fear of crime should be an integral part of the way new development is designed. Design which fails to take opportunities to improve the character and quality of an area should not be accepted. Policies should not seek to impose particular architectural styles and should not stifle original design based on unsubstantiated requirements. Local distinctiveness should be promoted and reinforced when supported by clear plan policies or supplementary planning documents. Some parts of the borough have a poorer quality environment with poor social conditions, and resources might need to be directed towards these areas to improve their general quality. More inclusive design should form part of their regeneration.

The Options

Four options were presented during the Issues and Options consultation:

- 1. Maximise Intensity of use compatible with local context
- Higher density development should take place around existing centres close to good public transport. A general density standard should be applied across the rest of the borough but individual developments would be judged on merit.

- 3. Carry forward current Lewisham Unitary Development Plan policies to meet these aims.
- 4. Additional or amended Unitary Development Plan policies

The Preferred Option

Combination of Options 1 Maximise Intensity of use compatible with local context and 2 Higher density development to take place around existing centre with a general density standard elsewhere with individual developments judged on merit. The option also includes an element of the Issues and Options from the Transport Paper relating to use of Public Transport Accessibility Levels (PTALs). The response from the Greater London Authority has been taken into account by use of the London Plan categories of Central, Urban and Suburban as guidance to describe the local context, rather than making a requirement for the completion of local context studies. With respect to Options 3 and 4 many of the Unitary Development plan policies are adequate but amendments have been found necessary in some respects therefore a combination of Options 3 and 4 will be taken forward as the Preferred Option.

Draft Policies

U1 Development Sites

The Council has identified in the Site Allocations Document and on the Proposals Map, the larger sites which it is promoting for development, with an indication of the uses and general form and density of development that will be considered appropriate for these sites.

The Council will be seeking a high standard of design and townscape quality on these identified sites, and on all sites that may come forward for development during the lifetime of this document.

New development will need to have regard to the following principles:

- (a) The quality of design, including sufficient and well functioning private and public amenity spaces;
- (b) Urban design principles including acknowledgement and respect for the prevailing character of the area (see other policies in this chapter);
- (c) The location of the development in relation to amenity facilities including but not limited to: open space, leisure facilities, shops and cultural facilities;
- (d) Maintenance of adequate daylight and sunlight to adjoining buildings and land and preservation of residential amenity;
- (e) Maintenance of the existing landscape quality or any nature conservation interests including topography, landscape setting, ridges and natural features
- (f) Development of large (10 dwellings or greater and/or greater than 0.5 ha) or existing employment sites (larger than 0.5ha) should be undertaken within the context and framework of a Masterplan, or planning brief for the site. The Local Planning Authority will determine whether a Masterplan, or planning brief is required,
- (h) The Council's car parking policies as set out in Table 1 Lewisham Car Parking standards;
- (i) Maximise energy conservation, through effective layout, orientation, use of appropriate materials, detailing and landscaping design;

- (j) The nature conservation value and biodiversity of the site;
- (k) Achieve a 3* star rating under the Code for Sustainable Homes or BREEAM 'Very Good rating'.

Explanatory Text and London Plan Definitions Density Matrix

New development should normally be built within the following illustrative density ranges, according to whether the site falls within what is determined to be a Central, Urban or Suburban character area. For guidance purposes only, and NOT forming part of this policy, the range of density that **might** be appropriate is shown below:

Setting and Location		Predominant Housing Type		
	Accessibility Index (PTAL)	Detached and linked houses	Terraced houses and flats	Mostly flats
CENTRAL	6-4		450-700 hr/ha 165-275 u/ha Ave. 3.0 hr/u	650-1000 hr/ha 240-435 u/ha Ave. 2.7 hr/u
URBAN				
e.g. Major or District town centres and regeneration areas. Areas within 10 min walk/800 m of the	6-4		200-450 hr/ha 55-175 u/ha Ave. 3.1 hr/u	450-700 hr/ha 165-275 u/ha Ave. 3.0 hr/u
above town centres				
e.g. District town centre and sites along major transport corridors.	3-2	180-210 hr/ha u/ha Ave. hr/u	200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	300-450 hr/ha 100-150 u/ha Ave. 3.0 hr/u
e.g. District town centre and sites along major transport corridors.	2-0	180-210 hr/ha u/ha Ave. hr/u	180-210 hr/ha u/ha Ave. hr/u	180-210 hr/ha u/ha Ave. hr/u
URBAN Parking provision		1.5 space per unit	1.5-1 space per unit	Less than 1 space per unit
SUBURBAN				
e.g. District town centres Areas within 10 min walk/800 m of a town centre.	6-4	180-210 hr/ha 240-435 u/ha Ave. 2.7 hr/u	200-300 hr/ha 50-110 u/ha Ave. 3.7 hr/u	250-350 hr/ha 80-120 u/ha Ave. 3.0 hr/u
	3-2	150-200 hr/ha 30-65 u/ha Ave. 4.4 hr/u	200-250 hr/ha 50-80 u/ha Ave. 3.8 hr/u	
Currently remote	2-1	150-200 hr/ha 30-50 u/ha Ave. 4.6 hr/u		
SUBURBAN Parking Provision		1.5 space per unit	1.5-1 space per unit	Less than 1 space per unit

Notes to the Density Matrix

Note 1: In all settings, larger sites (greater than 0.5 ha) should be developed with a mix of house types. See policy H1 and H2 on housing mix.

Note 2: In a suburban setting, larger sites (greater than 0.5 ha) should be developed with a mix of house types. The majority of the site should be developed with non-flatted style housing. Car parking provision will not be permitted to exceed 1.5 spaces per unit in this circumstance.

Note 3: All the above densities and parking provision ratio's are indicative and may need to be adjusted if it is considered that the (off-street and) onstreet parking capacity is inadequate.

Note 4: If the urban context is appropriate higher densities for sites up to the maximum allowable in the above table with good public transport accessibility, may be appropriate in the following circumstances:

- (a) where the site is intended for permanent occupation by the elderly or students
- (b) is located in the Thames Policy Area as shown on the Proposals Map
- (c) is within a mixed use scheme where housing is combined with uses such as commercial, retail or industrial development.
- Note 5: Density ranges for sites within Lewisham and Catford Major Town Centres are dealt with in the relevant Area Action Plan documents.
- Note 6: Conservation areas: The primary consideration when considering the question of density in Conservation Areas will be whether a proposed development preserves or enhances the character or appearance of the area.

ANNEX 1 - NOTE ON LONDON PLAN DEFINITIONS

London Plan paragraph 4.47 states 'Appropriate density ranges are related to location, setting in terms of existing building form and massing and the index of Public Transport Accessibility (PTAL). Site setting can be defined as:

Central – very dense development, large building footprint and building of 4-6 stories and above, such as larger town centres all over London and much of central London.

Urban – dense development with a mix of different uses and buildings of 3-4 stories, such as town centres, along main arterial routes and substantial parts of inner London.

Suburban – lower density development, predominantly residential, 2-3 stories, as in some parts of inner London and much of outer London.

Definition of density: 'Residential density figures should be based on net residential area which includes internal roads and ancillary open spaces"

U2 Urban Design

The Council will expect new buildings and extensions or alterations to existing buildings to achieve a high standard of design, and that schemes are compatible with or complement the scale and character of existing development and its setting (including any open space). Innovative designs will be welcome. Schemes that do not consider the following design elements where they are relevant, and show how these are successfully handled, will not be acceptable. These elements include the following:-

- (a) the preservation and creation of urban form which contributes to local distinctiveness, or creates its own distinctive sense of place, such as plot widths, building features and uses, roofscapes, public spaces and gardens.
- (b) the retention and refurbishment of existing buildings where these make a positive contribution to the environment.
- (c) scale, height, bulk and mass, in relationship to the adjacent townscape.
- (d) layout and access arrangements including access for emergency and refuse vehicles.
- (e) whether the development complements or maintains the character and architecture of the surrounding development.
- (f) whether the development respects the scale and alignment of the existing street including building frontages.
- (g) the way the development addresses the street taking account of the need for the ground floor level to provide visual interest to the pedestrian environment, with doors and windows to provide physical and visual links between buildings and the public domain.
- (h) the clear delineation of public routes and whether convenient and safe pedestrian routes to local facilities and the public transport network are taken into account in the design including the needs of disabled people.
- (i) the quality and durability of building materials and whether the context in which they are used has been considered sensitively.
- (j) other building details including ornamentation, window style, walls and fences or other boundary treatment.
- (k) the quality of the landscape proposals for all areas not occupied by buildings (including river walls).

The proposals should be based on a landscape appraisal that indicates those elements that will be retained, including trees, and the presence or otherwise of any species of nature conservation interest. Details should be given as to how these landscape and nature conservation elements will be enhanced and, in the case of loss, proposals for mitigation or replacement.

Design and Access statements showing how the above elements are handled are required for all planning applications apart from householder applications outside Conservation Areas, changes of use and engineering operations as set out in Circular 01/2006.

Planning obligations may be sought in pursuit of this policy to mitigate the impacts of development and compensate for the loss or damage created by the development in accordance with policy CP13 of the Spatial (Core) Strategy.

U3 Development Sites – Trees, Landscape Planting and Nature Conservation

The Council will protect and enhance the biodiversity of the Borough, by having regard to the nature conservation value of all sites in the Borough, and seek to protect and enhance these, either though the imposition of planning conditions where necessary or by ensuring alternative equivalent new habitat is provided nearby. Development proposals for these sites should be accompanied by an environmental appraisal, arboricultural study, and/or ecological impact assessment as appropriate, including methods of mitigation and proposals for compensation. In particular the Council will:-

- (a) require developers as a condition of planning permission, to retain existing trees of amenity or nature conservation value,
- (b) resist the loss of trees unless dangerous to the public or in rare circumstances when felling is required as part of a replanting programme and particularly on sites where trees make a significant contribution to the character and appearance of an area
- (c) require the retention where practicable of any features of nature conservation interest such as ponds or roosts and encourage the provision of new features
- (d) require planting schemes, including trees, to reflect the species already occupying the sites and the biodiversity of the Borough and be of native provenance
- (e) make Tree Preservation Orders when necessary
- (f) require 'Living Roofs' where appropriate in order to make a contribution to local biodiversity, sustainable construction, energy efficiency and sustainable urban drainage
- (g) encourage the use of Sustainable Urban Drainage techniques where appropriate.

U4 Designing out Crime

The Council will require all development to be designed to provide and improve safety and a secure environment. The design of new developments should:

- (a) ensure that paths, play spaces, entrances and exits are overlooked, and not obscured by excessive planting or other design features
- (b) ensure that public and private space is well defined
- (c) avoid as far as possible small unassigned pockets of land
- (d) provide for adequate lighting
- (e) assure that public frontages and main entrances address the public realm.

U5 Inclusive Environment

Applications for development, including the alteration, extension or change of use of buildings, should provide suitable access for people with disabilities to meet Part M of the Buildings Regulations or BS8300.

Development Proposals (except for householder applications which are outside a Conservation Area, changes of use and engineering operations as set out in Circular 01/2006) should include an Access Statement showing how the principles of inclusive design, including the specific needs of disabled people have been integrated into the proposed development, and how inclusion will be maintained and managed. Developers should also refer to policy H8 Lifetime Homes and Wheelchair Accessible Homes

U6 Residential Development - Layout and Amenity

In order to provide a good quality environment for new and existing residential development in the borough, the Council will:

- (a) ensure that new dwellings and tall buildings are sited appropriately and resist the siting of incompatible development close to residential areas
- (b) ensure the provision of a satisfactory level of privacy, outlook and natural lighting
- (c) ensure the appropriate provision of a readily accessible, secure, private and useable amenity space. Each family dwelling should normally be provided with a private garden area with a minimum garden depth of 9 metres.
- (d) In mixed tenure schemes ensure that social and private housing are indistinguishable through overall design quality
- (e) Protecting existing community facilities and open spaces and seeking new ones as appropriate with owners and developers.

U7 Places for Children to play

The Council will seek to provide attractive, safe and accessible places for children to play by:

- (a) providing a network of local play facilities
- (b) ensuring that new family and mixed housing schemes are designed so as to permit children to play in safety, and will investigate modifications to play areas close to flatted dwellings
- (c) seeking formal play provision especially in larger new shopping and housing provision
- (d) accepting the provision of a play area in public open space rather than within a development itself where more beneficial to the community
- (e) ensuring play spaces are placed where they are overlooked and well lit.

U8 Development on Backland and Infill Sites

Development on backland and infill sites will need to satisfy the requirements of the

general urban design policies elsewhere in this plan as well as the following additional factors:

- (a) Consideration will be given to the cumulative impact arising from a number of backland or infill schemes in an area. The Council will need to be satisfied that the overall character and amenities of an area will not be unduly harmed by the impact of a number of schemes
- (b) Sufficient privacy, garden depth and area should be retained by existing dwellings
- (c) Access issues need special consideration as backland sites are not connected to the street network – for pedestrians, cyclists and also emergency and refuse vehicles.

Where the site was originally, in part or in whole, the private garden of one or more houses, the density calculation of the proposed development will take into account the site area of the original house and the number of habitable rooms in the house.

U9 Extensions and Alterations to Buildings

Alterations and extensions (including roof extensions) should respect the plan form, period, architectural characteristics and detailing of the original buildings, including external features, and should normally use matching materials.

The Council will therefore require:

- (a) Side extensions normally to be set back from the main building line to allow for a clear visual break between existing buildings, and to be visually subsidiary to the main building
- (b) new doors and windows to reflect the character, size and alignment of existing doors and windows
- (c) external features such as chimneys, porches, doors and windows to be in keeping with the original pattern and character of the building
- (d) all plant, pipe work, fire escapes, lifts and other equipment such as ducts and flues to be included within the building envelope or sited to ensure the least visual impact.

Extensions to housing, and to non residential buildings adjacent to housing, will only be permitted where a readily accessible, secure, private and useable external space for recreational and domestic purposes is retained and there is no appreciable loss of privacy and amenity (including sunlight and daylight) for adjoining houses and their back gardens.

Extensions and roof extensions will not be permitted where:

- (a) the architectural integrity of a building would be harmed
- (b) the architectural integrity of a group of buildings would be adversely affected
- (c) the roofline or party walls are exposed to long views from public spaces, and a roof extension would have an obtrusive impact on that view.

U10 Shopfronts

The Council will seek to establish and maintain shopfronts of a high design quality by:

- (a) requiring the retention of shopfronts of quality, either original to the building, or of particular value.
- (b) requiring all new shopfronts including signs, to relate well to the original framework and scale of the building within which they are placed, which will include:
 - a. retaining or reinstating existing original fascia and pilaster columns which from the window surrounds including where shopfronts are combined
 - b. ensuring that materials relate well to the building. Preferred materials will be timber, and the use of aluminium discouraged.
- (c) discouraging open shopfronts without a glazed screen that break up the continuity of a shopping frontage
- (d) requiring wherever possible separate access to any residential accommodation on other floors, and encouraging the restoration of such access if already removed.
- (e) requiring the provision of suitable access for people with disabilities in new shopfronts.
- (f) including street numbering on new shop fronts.
- (g) making provision in the design for storage or refuse bins where feasible.

In Conservation Areas the Council will additionally:

- (h) require the retention and refurbishment of shopfronts that are original to the building and/or contribute to the special architectural or historic character or appearance of the Conservation Area
- (i) require all new shopfronts, and the materials used for shopfronts to preserve or enhance the special architectural or historic character or appearance of the Conservation Area.

U11 Shop and Building Signs, Advertisements and Poster Hoardings and Other Advertisement Displays

Shop signs, including projecting signs should normally be located at fascia level.

Moving digital displays and message boards and intermittent or flashing signs will not normally be acceptable.

Within Conservation Areas and residential areas, internally illuminated box signs, will not normally be permitted unless they can be successfully related to the design and detail of the building, and do not detract from the special character of a group of buildings or a street. Other advertisements including shop advertisements should be of a high quality design and use appropriate materials.

The Council will resist the display of poster hoardings which are considered to be out of scale and character with the building/site on which they are displayed.

Normally refuse permission for temporary promotional banners or other forms of temporary advertising where they would detract from the character or appearance of a conservation area.

Temporary hoardings may be suitable for some form of public art.

U12 Roller Grilles and Shutters

Planning permission for solid roller shutters for shop windows will not be granted.

Preference will be given to security glass and to open mesh shutters where necessary, which enable the shop window display to be clearly visible and allow the diffusion of internal light to the street, with box for any grille or shutter, wherever possible, contained behind the fascia.

U13 Street Furniture and Paving

The Council will require any necessary street furniture and paving to be well designed in order to harmonise with the street scene, and sited so as to minimise visual clutter, and to allow level and safe passage for all, including people with disabilities.

In Conservation Areas the Council will seek to ensure that street furniture and paving is compatible with the character of the area.

The Council will seek the preservation of historic street furniture and other structures that are of value to the local street scene.

U14 Masts, Satellite Dishes and Telecommunications Equipment

Satellite dishes and other telecommunications equipment should always be designed and sited where they will have the least detrimental visual impact. They should be sited in locations not detrimental to the character of Conservation Areas and Listed Buildings 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. Permission may be refused for structures which are seen as prominent skyline features from street level or other sensitive viewpoints.

In carrying out this policy the Council will:

- (a) consider intervention to seek the relocation of apparatus where an installation is carried out under permitted development rights and is not, so far as is practicable sited so as to minimise its effects on the external appearance of the building on which it is located
- (b) encourage the provision of communal telecommunications equipment in new

- development and rehabilitation schemes where time limited consents have been granted and
- (c) encourage the removal or upgrading of older telecommunications equipment in order to minimise visual impact.

In the case of development proposals for masts, 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 provision of evidence that the possibility of erecting antennae on an existing building, structure or mast site has been explored. In the case of site sharing, evidence should be provided that the site can accommodate any additional apparatus required. The Council will require sympathetic design of masts in order to minimise the impact of the development on the environment.

Plans will need to show the complete installation including details of the finish, location and design of service access arrangements, the location and appearance of cable runs, the location and appearance of transformer cabinets; and details of the maintenance schedule of the installation as well as its host environment.

U15 Art in Public Places

The Council will strongly encourage the provision of public art in association with all major development schemes in the Borough as part of S106 Agreements. It will also seek such provision with regard to smaller developments on prominent sites such as within Town Centres, and in parks and open spaces. The artistic works should contribute to the environment and embellish and enliven areas frequented by the public, and regard will be had to these qualities when assessing applications for this type of development in addition to other requirements in this Plan.

The Council will negotiate with developers to provide murals or other artistic works to screen prominent sites which are to be boarded up for more than six months.

Reasons for the Preferred Option

Consistency with National and Regional Planning guidance

PPS 1 Delivering Sustainable Development states that design which fails to take opportunities to improve the character and quality of an area should not be accepted. Policies should not seek to impose particular architectural styles and should not stifle original design based on unsubstantiated requirements. On the other hand it is proper to seek to promote or reinforce local distinctiveness when supported by clear plan policies or supplementary planning documents.

New development should be of a high quality design and have an inclusive layout. The opportunity should be taken to improve the character and quality of an area. Development plans should contain clear comprehensive and inclusive access policies that consider people's diverse needs and aim to break down unnecessary barriers and exclusions to benefit the entire community.

The London Plan states that the aim of development should be to maximise intensity of use compatible with the local context. This is in promotion of the 'Compact City' and sustainable development.

The London Plan encourages the integration of transport and development by encouraging patterns and forms of development that reduce the need to travel and by supporting high trip generating development only at locations with high public transport accessibility and capacity (Policy 3C.1).

The London Plan requires developments to be well designed and accessible. (Policies 4B.1, 4B.2, 4B.4, 4B.5, 4B.7, 4B.8)

By Design: Urban Development in the Planning System – Towards Better Practice. This document is supplementary to national planning policy and sets out a series of inter-related urban design objectives dealing with character, continuity, enclosure, quality of the public realm, ease of movement, legibility, adaptability and diversity. These may be translated into physical forms to define overall layout (routes and building blocks); scale (building heights and massing); appearance (details and use of materials); landscape (public realm, built and green spaces).

Safer Places: The Planning System and Crime Prevention. This document gives advice on planning considerations relating to crime prevention. It establishes the risk design principles for all new development which seek to reduce crime and the risk of crime and provide people with a safer and more secure environment. It describes the attributes of safe, sustainable places, which includes ease of access and movement and surveillance.

Planning and Access for Disabled People: A Good Practice Guide. This document deals with the delivery of inclusive environments. It aims to ensure that new development removes unnecessary barriers and exclusions by ensuring that consideration of access issues is made an integral part of the design process for new developments and thereby ensure their long term sustainability.

Community Strategy and Other Council Documents

One of the priority aims of the strategy is to secure the sustainable regeneration of Lewisham – its housing, transport and environment, in particular the high quality of the built environment.

Creative Lewisham. This is a local strategy which presents a vision of Lewisham as a visually exciting, creative and imaginative hub, creating a synthesis between urban design, arts, culture and the economy.

What alternatives were considered and why were they rejected

No options were rejected. Elements of both were used and combined into the

Preferred Option policies.

3.6.2 TALL BUILDINGS

Tall buildings are defined as those which are significantly taller than their surroundings and/or have a significant impact on the skyline. For the purpose of this

discussion, masts and other high structures such as large wind turbines are included in this definition.

Tall buildings are not generally in keeping with the scale and character of the borough as a whole. Most developments are low rise, with small concentrations of higher buildings mainly in Lewisham and Catford Town Centres, and in some postwar housing estates. This picture has started to change with the future development on Convoys Wharf where high buildings are included on the riverfront, and at Lewisham Gateway. Other developers seeking higher buildings on various sites in the borough may come forward during the lifetime of this plan.

The Options

The following options were presented as part of the Issues and Options Consultation:

- 1. Tall Buildings should be welcomed in locations identified by borough wide context studies.
- 2. Tall buildings should be ruled out in certain locations identified by context studies, and directed to sites where high buildings already exist (major town centres) subject to their suitability, or where a planning study identifies a particular location as suitable.
- 3. Allow tall buildings subject to general location, height, massing and context standards based on the criteria contained in general development control policies.
- 4. Include general criteria policy for judging the design quality of tall buildings.

The Preferred Option

A combination of parts of Options 2 and 4

U16 Tall Buildings

Tall buildings are those buildings and structures which significantly exceed the height of surrounding development and/or have a significant impact on the skyline.

The major Town Centres of Lewisham and Catford (See Town Centre Area Action Plans) are identified as potentially suitable for tall buildings, as is the Convoys Wharf Area. Other sites may come forward during the lifetime of this document that may be identified as suitable for tall buildings in planning studies or Supplementary Planning Documents.

The siting of tall buildings will need to contribute to the overall coherence of the skyline of the borough and act to improve the overall legibility and urban design quality of the borough.

Proposals for tall buildings need to show how they do not harm the landscape and heritage features of the following areas:

- (a) World Heritage Sites of Maritime Greenwich and the Strategic Buffer Zone declared at Blackheath (shown on the Proposals Map)
- (b) London Panoramas as defined in the London Plan and Local Views
- (c) Conservation Areas
- (d) Metropolitan Open Land and other Open Spaces including London Squares
- (e) Historic Parks and Gardens

- (f) Listed Buildings and their settings
- (g) Sydenham Ridge Area of Special Character

Applications for tall buildings should be of outstanding architectural quality and will need to satisfy the Council that the following potential issues arising from the development of high buildings have been dealt with satisfactorily:

- (g) The quality of the silhouette, crown and bulk of the buildings
- (h) visual impact and interest at street level
- (i) additional illumination from the building at night
- (j) overshadowing or micro-climatic problems at street level such as wind turbulence
- (k) overshadowing of riverside pathways, channels, and the foreshore with a detrimental effect on the river environment
- (I) relationship to existing high buildings and structures
- (m) impact on aircraft operations
- (n) potential disruption to navigation on the River Thames
- (o) an assessment of interference affecting telecommunications

Reasons for the Preferred Option

Consistency with National and Regional Planning Guidance

PPS 1 Design should be of high quality and should take the opportunities available for improving the character and quality of an area and the way it functions. It underlines the importance of good design in securing high quality, inclusive safe and sustainable developments that show respect for their surroundings and context.

The London Plan (Policy 4B.8 and 4B.9) states that tall buildings will be promoted where they create attractive landmarks, help to provide a coherent location for economic clusters of related activities and/or act as a catalyst for regeneration and where they are also acceptable in terms of design and impact on their surroundings. It also states that Boroughs may wish to identify areas of specific character that could be sensitive to tall buildings and explain what aspects of local character could be affected and why. Unsubstantiated borough-wide height restrictions should not be imposed. Although the compact city and intensive development does not necessarily imply a need for tall buildings they can be an efficient way of using land and contribute to sustainability in important locations with transport capacity.

Consistency with other Council documents

This policy is supported by the Council's Community Strategy which aims to secure the sustainable regeneration of Lewisham as a place – its housing, transport and environment, in particular to ensure the high quality of the built environment.

What alternatives were considered and why they were rejected

Option 1 was thought to be potentially too inflexible by identifying in advance those areas of the borough that might be thought suitable for tall buildings.

Option 3 was thought to potentially be too vague as to where higher buildings might be located and lead to damage to the overall low rise residential character of the borough.

Other planning reasons

The proposed draft policy is considered to strike a balance between allowing for the location of tall buildings in appropriate locations such as the major town centres where tall buildings are located, providing for flexibility should development proposals for tall buildings come forward, and protecting the valued elements of the boroughs built and natural environment. The potential in Option 2 to rule out buildings in locations identified by context studies, was considered to be less preferable than identifying elements of the built and natural environment that should not be harmed by the introduction of tall buildings.

3.6.3 THE HISTORIC ENVIRONMENT

Many elements of Lewisham's environment are of high quality and historical value. Large parts of the borough are Conservation Areas where a duty is laid upon the Council by the Town and Country Planning legislation to ensure that new development preserves or enhances the character of the area. There are a number of Listed Buildings in the Borough which the Council has a duty to preserve. Archaeological remains are considered to be a community asset and provide a valuable picture of the history and development of the local area as well as London as a whole. There are a number of other elements such as locally listed buildings, and street furniture such as troughs and boundary stones, that are subject to less formal protection but worthy of preservation.

The Options

The Council has a duty under Town and Country Planning legislation to preserve or enhance Conservations Areas and to preserve Listed Buildings. The options presented were therefore in the form of open questions as to whether there were other elements in the boroughs environment that might be protected.

The Preferred Policies

U17 Conservation Areas

In addition to the areas designated so far, the Council will periodically review its Conservation Areas, designating new areas and extending new ones as appropriate and as resources permit. The Council will produce character appraisals and will formulate and publish guidance for the preservation or enhancement of Conservation Areas. Where appropriate the Council will make Article 4 directions to remove or reduce permitted development rights and will protect trees with tree preservation orders in order ensure the preservation or enhancement of conservation areas.

U18 New Development, Changes of Use and Alterations to Buildings in Conservation Areas

The Council, having paid special attention to the desirability of preserving or enhancing the special or historic character and appearance of its conservation areas, will not grant planning permission where:

- (a) new development or alterations to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials; and
- (b) proposed changes of use are incompatible with the preservation or the character of the area, except where they are essential for the urgent preservation of a building of value to that area and mitigating measures are taken.

In carrying out this Policy the Council will:

- (c) only consider detailed applications for development, including that which is to replace demolished buildings;
- (d) resist development adjacent to a Conservation Area which has a negative impact on the character or appearance on that area;
- (e) encourage or require as appropriate the retention and reinstatement of building and landscaping features such as sash windows, timber doors, slate roofs, front gardens and boundary walls important to an area's character or appearance;
- (f) recognise the importance of original street furniture and paving materials, and otherwise by encouraging their restoration and reinstatement where feasible; and
- (g) where it is considered necessary to retain an unlisted building, in part or in whole, structural alterations to the building which would materially alter the character or appearance of the conservation area, will only be acceptable where they will preserve or enhance the character and appearance of the Conservation Area, and where it can be demonstrated that the alterations proposed can be carried out without unacceptable risk to the retained fabric.

U19 Demolition in Conservation Areas

There will be a presumption in favour of the preservation of unlisted buildings that make a positive contribution to the character or appearance of a Conservation Area. Proposals involving the demolition of unlisted buildings will first be considered against the following criteria:

- (a) whether the building makes a positive contribution to the character of the conservation area;
- (b) its capacity for re-use;
- (c) the adequacy of efforts made to retain the building and the cost of repairing it; When the Council is satisfied that the building does not need to be retained or that it is not practicable to reuse the building the Council will consider the merits of the proposed redevelopment and its anticipated ability to preserve or enhance the character and appearance of the Area.

Formal consent for demolition will not normally be granted in the absence of a detailed independent report on the above points, and proposals for the replacement development.

Full planning permission for the replacement development will need to have been granted or granted concurrently with the consent for demolition which will have conditions requiring the implementation of the approved development scheme.

U20 Preserving Listed Buildings

To preserve and enhance Listed Buildings and their features of special architectural or historic interest the Council will;

- (a) only grant consent for the demolition of a Listed Building in exceptional circumstances.
- (b) only grant consent for alterations and extensions to Listed Buildings which relate sensitively in terms of materials, style and craftsmanship to the important characteristics both internal and external, of the original building.
- (c) promote the reinstatement of features that were original to the building and which would preserve or enhance its special architectural or historic interest.
- (d) use its powers under Sections 47, 48 and 54 of the Town and Country planning (Listed Buildings and Conservation Areas) Act 1990, to ensure that Listed Buildings are maintained to a reasonable standards:
- (e) have special regard to the desirability of preserving the setting of Listed Buildings in considering any application in their vicinity in terns of other policies; and
- (f) continue to identify buildings suitable for inclusion in both the Statutory and Local List of Buildings of Special Architectural and Historic Interest.

U21 Listed Buildings – Changes of Use

In considering applications involving change of use the Council will consider the contribution of existing and proposed uses to the character of the historic building, and will resist proposals which would fail to preserve or enhance the character or appearance of the listed building or its setting. Wherever possible, the original use of an historic building should continue, particularly if it is residential. If the use has been changed from the original, serious consideration should be given to whether it can revert to that use. In some cases it may be appropriate to find essential other uses, avoiding damage to important features. The new and adapted use must not adversely affect the special architectural or historic interest of the building or its setting. The implications of complying with other statutory requirements such as fire

escapes need to be taken into account prior to determining applications for change of use.

U22 Locally Listed Buildings

Locally Listed buildings are those which are considered by the Council to be of local historic or architectural interest or of townscape importance.

The Council will seek to ensure and encourage the preservation and enhancement of Locally Listed Buildings of townscape merit and will use its powers where possible to protect their character and setting.

U23 Archaeology

The Council will promote the conservation, protection and enhancement of the archaeological heritage of the Borough and its interpretation and presentation to the public by:

- (a) requiring applicants to have properly assessed and planned for the archaeological implications where development proposals may affect the archaeological heritage of a site. This may involve preliminary archaeological site evaluations before proposals are determined;
- (b) advising where planning applications should be accompanied by an evaluation within Archaeological Priority Areas as shown on the Proposals Map. This should be commissioned by the applicants from professionally qualified archaeological organisation or consultant;
- (c) encouraging early co-operation between landowners, developers and archaeological organisations, in accordance with the principles of the British Archaeologists and Developers Liaison Group Code of Practice, and by attaching appropriate conditions to planning consents, and/or negotiating appropriate agreements under S106.
- (d) encouraging suitable development design, land use and management to safeguard archaeological sites and seeking to ensure that the most important archaeological remains and their settings are permanently preserved in situ with public access and display where possible and that where appropriate they are given statutory protection;
- (e) in the cases of sites of archaeological significance or potential where permanent preservation in situ is not justified, provision shall be made for an appropriate level of archaeological investigation and recording should be undertaken by a recognised archaeological organisation before development begins. Such provision shall also include the subsequent publication of the results of the excavation;
- (f) seeking to ensure their preservation or record in consultation with the developer in the event of significant remains unexpectedly coming to light during construction; and
- (g) in the event of the Scheduling of any Ancient Monuments and Sites of National Importance, ensuring their protection and preservation in accordance with Government regulation, and to refuse planning permission which

adversely affects their sites or settings.

Reasons for Preferred Options

Consistency with National and Regional Planning Guidance

The Council considers that these policies meet the requirements for the protection of the historic environment as required in National Planning Guidance PPG 15 'Planning and the Historic Environment and the Town and Country Planning (Listed Buildings and Conservation Areas Act 1990.

Consistency with other Council documents

These policies are supported by the Council's Community Strategy which aims to secure the sustainable regeneration of Lewisham as a place – its housing, transport and environment, in particular to ensure the high quality of the built environment.

3.6.4 PRESERVATION OF STRATEGIC AND LOCAL LANDSCAPE FEATURES

Strategic Views

The London Plan identifies two panoramic views from Greenwich Park and Blackheath Point towards St Paul's Cathedral.

The Option

These Strategic Views will be carried forward in to the Local Development Plan documents. The views proposed by the Mayor are likely to be somewhat modified from the views protected by the 1991 directions. They will be carried forward in to the Local Development Framework once the consultation process for the Mayor's Supplementary Guidance is completed and the Secretary of State's directions are withdrawn. Each protected vista in the London Plan includes a Landmark background assessment area whose purpose, is to ensure that new development does not detract from the ability to recognise and appreciate the designated landmark. Each area is defined on the plan as the projection of the Landmark Viewing Corridor and the Landmark Lateral Assessment Areas for a distance beyond the monument, which in most cases is 2.5 km. Each Landmark Background Assessment Area has a threshold plane, which defines the point at which new developments might impact on the ability to recognise and appreciate the landmark. Developments that would exceed this threshold plane must be referred to the Mayor and other consultees. When such consultation is undertaken, proposals will be required to prepare Accurate Visual Representations to allow the degree of impact to be assessed.

The threshold plane within each Landmark Background Assessment Area is projected from a position 1.6 m above the Assessment point, through a horizontal line, at right angles to the centre line of the Protected Vista.

U24 Strategic Views

In order to protect and enhance the Strategic Views of St Paul's Cathedral, illustrated on the Proposals Map the Council will:

- (a) normally refuse planning permission for development proposals within the viewing corridor which exceed the height of the development plane between the Viewpoints and the base of the lower drum of St.Paul's Cathedral
- (b) protect and enhance the foreground, background and wider setting of the strategic views of St.Paul's by resisting development within the defined Wider Setting and Background Consultation areas which would have an adverse effect. The improvement of the views would be sought where existing buildings of inappropriate heights are redeveloped; and
- (c) consult and take into consideration the comments of other local authorities along the line of the view, the Mayor of London, and any other appropriate bodies before making a decision on any planning application for development exceeding the defined consultation thresholds on the protected areas.

Reasons for the Preferred Option

National Planning Policy

RPG 3 (Annex A Supplementary Guidance for London on the Protected strategic Views November 1991) These directions limit the height of new development in the Strategic Viewing Corridors for the views described above. The policy above reflects these directions which are still current.

The London Plan.

Policy 4B.16 of the London Plan calls these strategic views 'London panoramas' and says that 'within these views, proposed developments, as seen from above or obliquely in the front and middle ground, should fit in with the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. The management of landmarks should afford them an appropriate setting and prevent a canyon effect from new buildings crowding in too close to the landmark.' The panoramas identified in the London Plan seek to preserve or enhance the qualities of the panoramic view across a substantial part of London, while also geometrically managing views towards particular landmarks within the view through geometric definition. In contrast, previous guidance in RPG3A focussed entirely on protection of the landmark, meaning that the qualities of the panorama as a whole were not managed from the viewing place.

Consistency with other Council documents

This policy is supported by the Council's Community Strategy which aims to secure the sustainable regeneration of Lewisham as a place – its housing, transport and environment, in particular to ensure the high quality of the built environment.

3.6.5 LOCAL VIEWS AND LANDMARKS

Lewisham has in the past preserved Views and Landmarks of more Local Significance. They are a significant element in the built environment, contributing strongly to local character and a sense of place. The current Unitary Development Plan Policy protects significant local vistas and buildings currently considered to be of townscape importance by resisting development which impedes or detracts from Local Views or obscures existing views of Local Landmarks.

Under this policy development in the view corridors should be limited in height and bulk so that it does not detract from the view or obscure the landmark.

There are a number of open spaces on the tops of hills in Lewisham which have panoramic views across London. The Local Views currently designated by the Lewisham UDP use these locations (the exception being the viewpoint at Deptford Strand which has an extensive river prospect). They are all publicly accessible and have extensive views over at least two compass quadrants. For example, View LV5 in Mountsfield Park Catford, is taken from the highest point of the park and has views over two compass quadrants to the North West and South West.

The Local Landmarks are usually older buildings of character, higher than the surrounding built development that provide point and character to the surroundings. A list of currently designated local landmarks and views is in Schedule 1 in the adopted Unitary Development Plan.

The Options

The following Options were presented as part of the Issues and Options Consultation:

- 1. Maintain current set of views and landmarks
- 2. Modify the criteria for selection of local views by changing criteria to include significant local 'vistas'.

The Preferred Option

Option 1 will be carried forward.

Draft Policy

U25 Important Local Views and Landmarks

Significant local panoramas and buildings currently considered to be of townscape importance which are the basis for local views are designated as Local Views and Local Landmarks, together with the method by which the policy will be implemented in each case, and shown on the Proposals Map.

Development which impedes or detracts from Local Views or obscures existing views of Local Landmarks will be resisted.

Other local views of significance and proposals for their protection are to be found in Conservation Area character appraisals published by the Council.

Reasons for the Preferred Option

National and Regional Planning Policy

London Plan Policies 4B.15 London View Protection Framework and Policy 4B.16 View management plans supports this option.

Consistency with other Council documents

This policy is supported by the Council's Community Strategy which aims to secure the sustainable regeneration of Lewisham as a place – its housing, transport and environment, in particular to ensure the high quality of the built environment.

3.6.6 AREAS OF SPECIAL CHARACTER

The Lewisham Unitary Development Plan currently protects three 'Areas of Special Character' that contribute to the landscape and character of London as a whole. This designation was carried over from the old Greater London Development Plan (GLDP). Following the abolition of the old Greater London Council, Lewisham Borough took over the strategic aspects of planning the borough and considered it appropriate to afford the protection given by the GLDP policy to these areas. The Areas of Special Character in Lewisham are:

- Blackheath where the aim is to protect the skyline, viewpoints, architectural and historic character and village qualities and to promote traffic free enclaves
- Sydenham Ridge where the aim is to safeguard its scale and character and to protect the skyline
- River Thames where the aim is to protect the character of the water area of the river

The Options

Four options were presented as part of the Issues and Options Consultation

- Continue current protection to all Areas of Special Character as defined in the Lewisham Unitary Development Plan
- 2. Remove protection for Thames Area of Special Character
- 3. Remove protection for Sydenham Ridge Area of Special Character
- 4. Remove protection for Blackheath Area of Special Character

The Preferred Option

The preferred option is to no longer designate the Blackheath and Thames Areas of Special Character and the continue to designate the Sydenham Ridge Area of Special Character.

U26 Sydenham Ridge Area of Special Character

The Council will maintain and enhance the landscape value of the Sydenham Ridge Area of Special Character by resisting developments that adversely affect its scale, character and skyline.

Reasons for the Preferred Option

Consistency with national and regional planning guidance London Plan Policies 4B.1 4B.7 Respect Local context and communities supports this option, in that it seeks to manage local distinctiveness by ensuring the preservation of local context, character and communities.

Consistency with other Council policy documents

One of the main priority issues of the Lewisham Community strategy is to secure the sustainable regeneration of Lewisham – its housing, transport and environment which supports this policy.

Other Planning Reasons

The Sydenham Ridge is a distinctive, attractive landscape feature providing a long skyline visible from a wide area within Lewisham. Tall or bulky buildings on the slopes and ridge would be out of scale with its current character and visually dominant and intrusive

What alternatives were considered and why they were rejected
It was not thought appropriate to maintain this designation for Blackheath as this area is covered by several overlapping designations that protect its important features.

This is also the case with the River Thames.

3.6.7 RIVER THAMES, DEPTFORD CREEK AND THE RAVENSBOURNE RIVER NETWORK

The River Thames frontage and the river network of Lewisham (Deptford Creek, River Ravensbourne and its tributaries) all contribute to the overall environmental quality of the Borough. The River Thames and adjacent areas make a strategic contribution to the landscape and built environment of London as a whole. Some of the issues relating to these areas will be dealt with in the 'Open Spaces' Section of the Preferred Options document. The River Thames is also referred to in the Employment and Transport Preferred Options chapters. This paper will deal with the aspects that relate to the built environment.

The Options

An option was put forward that development should respect and enhance the character of the River Thames, the River Ravensbourne Network and Deptford Creek, and suggestions requested that could improve the policy.

The Preferred Option

These policies will be included in the Preferred Options.

U27 Thames Policy Area

The Council will seek a high quality of design respecting the special character of the River within the designated Thames Policy Area shown on the Proposals Map. Proposals for redevelopment or change of use within this area will be required to:

- (a) enhance the quality of the built environment
- (b) take account of the local context, and contribute to improving the relationship with the River, views and local landmarks, recreational facilities, and the protection of Listed Buildings and the archaeological heritage. All riverside development should address the River, as an important part of the public realm
- (c) maintain existing visual links and physical connections with the River and where possible establish new links and connections
- (d) contribute to improving the liveliness of the Riverfront by providing a mixture of uses on sites to be developed close to the River, including where appropriate the inclusion of public uses on the ground floor of buildings along the Thames Path. River-related and marine uses will be encouraged
- (e) maintain and where appropriate enhance the appearance and nature conservation interest of the River Thames corridor, including the River walls, and foreshore
- (f) maintain the stability of the tidal defences
- (g) retain the existing River infrastructure including dry-docks, slipways, and steps for future use where practicable;
- (h) meet the requirements of all other relevant policies in this Plan.

Proposals which involve encroachment into the River Thames and its foreshore will be resisted. Development should maintain the open character of the River Thames. Thameside proposals should examine opportunities to retreat the flood defence to increase flood storage, wildlife and aesthetic value and visual connections with the River.

U28 Thames Path

The Council supports the concept of a continuous Thames Path as part of the Thames National Trail. Opportunities should be taken when and if they arise to realign the Thames Path onto the riverfront, providing there are no conflicts with river-related operations. Provision should be made where possible for both pedestrians and cyclists.

U29 Thames Foreshore

Opportunities to maintain, and where appropriate, enhance access to the foreshore will be encouraged in conjunction with the Port of London Authority, subject to environmental and safety considerations.

U30 Deptford Creek and River Ravensbourne Network

Planning applications for the redevelopment of sites adjacent to the network should secure where appropriate:

- (a) public access and views to the waterside
- (b) maintain existing visual and physical connections with the creek or river network and where possible establish new links and connections
- (c) contribute to the liveliness of the river or creek frontage by providing a mix of uses
- (d) maintain and enhance the appearance and nature conservation value of the Creek and/or rivers, including the flood and tidal defences and foreshore
- (e) improve the appearance, structure and environmental quality of Deptford Creek walls
- (f) take account of the local context, and contribute to improving the relationship with the river or Creek, views and local landmarks, creek moorings, and the protection of Listed Buildings and the archaeological heritage.

Proposals which involve encroachment into Deptford Creek will be resisted.

Reasons for the Preferred Option

Consistency with National and Regional Planning Guidance

The London Plan describes this as the 'Blue Ribbon Network', and states that Boroughs should recognise its strategic importance when making strategies and plans. All agencies involved in the management of the Blue Ribbon Network should seek to work collaboratively to ensure a co-ordinated and cohesive approach to land use planning, other activities and use of the Network. These policies are supported by London Plan policies in Chapter 4C the Blue Ribbon Network

The Port of London Authority's access survey (Access to the River Thames – A Port of London Authority Guide) identifies a number of access points within the borough of good community and environmental quality. Access to the Thames Foreshore, which is primarily in the ownership of the Port of London Authority can have both a recreational and educational value and there is a right of access for fishing, farming and other customary purposed. Public access must be considered in the context of the environmental, nature conservation and archaeological importance of the foreshore and in the context of safety considerations as the Thames at Lewisham is tidal.

Community Strategy and Other Council Documents

One of the main priority issues of the Lewisham Community strategy is to secure the sustainable regeneration of Lewisham – its housing, transport and environment which supports these policies.

What alternatives were considered and why they were rejected All policy guidance supports the inclusion of policies of this type so no alternatives were realistically considered.

3.7 HEALTH, EDUCATION AND COMMUNITY FACILITIES

Overview

Education, health and community facilities form a basic set of services that are essential in order to provide a thriving environment in which people can live, work and learn. An adequate provision of these facilities should be accessible and available to all across the borough. Additional demand arising from new developments need to be addressed and it should be ensured that there is no net loss of facilities. In order to facilitate sustainable living in the borough these facilities should be located so that they can be safely and easily accessed by walking, cycling or using public transport.

The term 'health, education and community facilities includes the full range of facilities that are present in the borough, including nurseries and other childcare facilities, all educational services and training facilities, primary healthcare, children's play and recreation, libraries, sports and leisure facilities, community halls, meeting rooms, places of worship and Public Conveniences.

A summary of the responses received from the issues and options consultation, the relationship to the community strategy, and the preferred options are detailed below:

Issues and Options consultation

The main responses on the sustainable environment topic from the Issues and Options consultation were:

 Responses strongly supported that all the relevant issues had been addressed for the options and that the most appropriate options had been proposed. There was a strong support for all the proposed options.

Relationship to the Community Strategy

The Community Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. It has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. As such, it deals with a range of public service issues well beyond the remit of the Local Development Framework. Nevertheless, consultation with local people on the Strategy has revealed a high level of concern about issues that are central to the LDF.

The preferred options are consistent with Action Plan 2, 3, 5, 6 and 7 of the Community Strategy.

Action Plan 2 discusses the need to sustain and improve the health and wellbeing of local people. The LDF can help deliver the LSP action on supporting and sustaining public community involvement; change the balance in the healthcare delivery system to give more appropriate care in the right place at the right time.

Action Plan 3 discusses the need to raise educational attainment, skill levels and employability. The LDF can help deliver the LSP action to consider whether provision is mapped to identified need and whether partners are working together to maximise impact.

Action Plan 5 discusses the development of the cultural vitality of Lewisham. The LDF can help deliver the LSP action of ensuring that public, voluntary and private sector organisations work in partnership to achieve shared strategic objectives in providing recreational and social education programmes.

Action Plan 6 discusses the need to secure the sustainable regeneration of Lewisham.

The LDF can help deliver the LSP action of facilitating closer working to improve the quality and sustainability of the local environment.

Action Plan 7 discusses the need to reduce welfare dependency, promote independence and increase the life chances of vulnerable members of the community. The LDF can help deliver the action of ensuring adequate local employment guidance and advice services.

The Options

Seven options were put forward as part of the issues and options consultation.

- 1. Protect existing sites used (or previously used) for health, education and community facilities from redevelopment to other uses.
- 2. Ensure that the health, education and community service needs arising from a development are provided.
- 3. Require major developments to undertake a social impact assessment.
- 4. Encourage the provision of health, education and community facilities to locate in areas with good public transport.
- 5. Provide flexibility for health, education and community uses serving a very local area to locate in residential areas.
- 6. Facilitate the up-grade / redevelopment / improvement of existing facilities
- 7. Ensure leisure, community, arts, cultural, entertainment and sports facilities are located in appropriate places that both contribute to sustainability objectives and provide access for users.

The Preferred Option

The preferred option is to proceed with a combined option. Draft policy 1 combines option 1 with a criteria based approach policy. Draft policy 2 is a combination of option 2, 3 and 6 with modifications. Draft policy 3 is a modification of option 4. Draft policy 4 is a combination of options 5 and 7 with modifications.

Draft Policies

HEC1 Size, nature and location

The size, nature and scale of health, education and community facilities should be considered so that they are suitably located within their catchment area. Leisure, Community, Arts, Cultural, Entertainment and Sports facilities should be located in appropriate places, such as regeneration areas, that both contribute to sustainability objectives and provide access for users.

HEC2 Redevelopment/Change of use of health, education community and leisure facilities

The Redevelopment/Change of use of health, education, community and leisure facilities will be permitted if it can be demonstrated that:

- (a) the facility can equally be replaced at an alternative site with an equal or improved level of accessibility; and
- (b) The facilities needs updating which cannot be achieved at a reasonable cost; or
- (c) a sound evidence base clearly indicates that the facility is no longer needed.

HEC3 Social and economic impact assessment

Major development proposals will be required to submit a social and economic impact assessment. Where a need for improved or additional health, education or community facilities is identified, planning obligations and conditions on planning permissions may be applied to ensure adequate provision.

HEC4 Provision of leisure Facilities

Within the Major and District Centres, but outside the Core Shopping Areas, the Council will encourage the provision of new, and retention of existing, recreational and leisure facilities including facilities for arts, culture and entertainment, as part of any appropriate major redevelopment in the Town Centres.

HEC5 Places of worship

Applications for places of worship will be granted permission provided the following have been taken into consideration:

- a) Adequate parking provision
- b) Traffic generation
- c) Noise generation
- d) Impact on neighbours
- e) Hours of operation
- f) Opportunity loss of other uses

Reasons for Preferred Option

National and regional planning guidance

The preferred options are consistent with the Government's white paper 'Choosing Health' (2004), PPG 17 (Planning for open space, sport and recreation) and London Plan policies 3A.15, 3A.18, 3.D1.

Consistency with other Council documents

The preferred options are consistent with the Education Development Plan 2002-2007; Skills for Life Strategy 2002-2010; Physical activity, sport and leisure strategy 2005-2010; Health Improvement and Modernisation Plan 2002-2005.

What alternatives were considered and why were they rejected
The preferred options provide a suite of directional policies for improved and sustainable health, education and community facilities for the borough. The preferred options reflect the current needs of the community and are in line with government and local policy guidance.

Draft Policy 1 recognises that leisure and associated facilities, play a specific and important role in promoting community satisfaction with their environment. The policy aims to ensure that the leisure needs of the population are provided for, particularly in areas of deprivation. The policy encourages facilities which serve a wide area to locate in areas with good public transport (e.g. town centres or in close proximity to town centres). This will help to ensure that facilities are easily accessible by sustainable modes of transport.

Draft Policy 2 requires that facilities used (or previously used) for health, education or community purposes are afforded some protection from redevelopment to other uses. The main change has been the protection of facility rather than the site, which allows for change of use for part of the site if necessary. This will ensure that the location, condition of the property, cost of refurbishment and replacements/alternative provisions are considered before a facility is redeveloped to another use. This will avoid any net loss of such facilities in the borough.

Draft Policy 3 requires major developments to undertake a social impact assessment which enables planning officers to assess the effects a development will have on the local community. The assessment reviews the following:

- an overview of the health, education and community services accessible to the development and their available capacity;
- an assessment of the likely future occupants of the development and their potential need for health, education and community services;
- the needs of service providers operating in the area (public and community) and a review of their possible accommodation requirements which may be met as part of the development;
- measures required to be implemented as part of the development (either onsite or as a contribution) to ensure any short-fall in provision created by the development is addressed.

This draft policy also sets the framework within which the Council can request a contribution from a developer towards funding new infrastructure and/or services to meet the need arising out of the development. This will be via a Planning Obligation or other legal agreement, relating to a specific development. This allows for some flexibility so that these matters can be considered on a case-by-case basis having regard to the proposal and its surrounds.

Draft policy 4 is a criteria based policy which ensures that places of worship are located appropriately taking into consideration the usage of the facilities and wider effect on neighbouring buildings and access to the site. It will be expected that the development proposal provide some information on some or all of these issues.

3.7.1 New School Sites and Improvement of existing Schools

Lewisham is facilitating an extensive schools building programme, Building Schools for the Future, which involves the demolition and construction of four schools in the borough. There is hence a need to find temporary sites for schools during the demolition of old premises and the construction phase of the new ones.

The Options

Four options were put forward as part of the issue and options consultation.

- 1. New Secondary School on site of Ladywell Leisure Centre.
- 2. Identify temporary sites for schools while improvement programme is underway.
- 3. Include criteria based policy to help determine planning applications for temporary school buildings.
- 4. Protect historic schools from demolition

Proposed Sites

- Site 1 Lewisham College, Lewisham Way SE13
- Site 2 Sedgehill School and sites on Beckenham Hill Road
- Site 3 Bonus Pastor School
- Site 4 Deptford Green School
- Site 5 New School Site (floating school on River Thames)
- Site 6 New School Site (Florence Road, Deptford)
- Site 7 New School Site (Evelyn Street, Deptford)

The preferred options for a new school site has been moved to the site allocations section of this report and is hence not discussed further in this section.

The Preferred Option

The preferred option is to proceed with option 3 with further developed criteria and option 4 which has been further developed and expanded.

Draft Policies

HEC6 Temporary school buildings

The Council will grant planning permission for temporary schools buildings provided that the following criteria have been taken into consideration:

- (a) There is no adverse impact on the amenity of the surrounding neighbourhood;
- (b) The proposed site is vacant or the existing use can be satisfactorily relocated; and
- (c) The proposed use is not on an open space.

Reasons for Preferred Option

Consistency with National and regional planning guidance

The policies are consistent with PPG 15 Planning and the Historic Environment and London Plan Policy 3A.21.

Consistency with other Council documents

The preferred options are consistent with the Education Development Plan 2002-2007; Skills for Life Strategy 2002-2010; Physical activity, sport and leisure strategy 2005-2010; Health Improvement and Modernisation Plan 2002-2005.

Issues and Options consultation

Half of the respondents supported the option to Identify temporary sites for schools while improvements programme is underway. There was particular concern about not building on open space. A majority of the respondents supported a criteria based approach for determining planning applications for temporary school buildings, and the option to protect historic schools from demolition.

What alternatives were considered and why were they rejected

Option 1 has been discarded as it is a site that will be considered in the Lewisham area action plan. Option 2 was discarded as this is an ongoing process and can be subject to change. Draft policy 5 deals with how we go about identifying sites for option 2 which is more appropriate at the development control policy level. The identification of a new site was considered to be more appropriately dealt with in the site allocations section.

Option 4 was discarded as the issue will be dealt with in the urban design section under conservation areas and locally listed buildings.

Draft policy 5 provides a criteria based policy for the location of the temporary sites. The location of temporary sites are important as schools may have a impact on the amenity value of the neighbourhood. Particularly in residential areas, issues such as visual intrusion and the increase in traffic generated by the school run will lead to parking problems and an increase in noise which can impact negatively on residents. The subsequent increase in air pollution will have a negative impact on the environment and public health. A temporary site will not be permitted in an open space to ensure the protection of these sites from development which can be harmful for biodiversity and reduces the green space available for the public. Other sites such as those designated as employment land can be considered for temporary change of use only if established that the use of the site for educational purposes is more beneficial.

3.8 ECONOMY AND EMPLOYMENT

Overview

Employment land in the context of planning legislation and the Use Classes Order is land devoted to employment in offices, factories and warehouses, including waste transfer and processing. It does not include employment in shops, retail warehouses or those offices in a shopping street frontage such as estate agents and solicitors. These uses are dealt with in the Retail and Town centres section and also in the Tourism section of this Development Plan Document.

The Government is committed to ensuring that sufficient sites, to enable a variety of commercial and industrial uses to carry out business, are retained, but also that less important sites, sites that are under used or not developed should not unnecessarily be retained. A balance needs to be struck between maintaining a sustainable economic base, and also allowing development to meet regeneration objectives or to meet housing provision targets (see Housing Preferred Options chapter). The Employment Land preferred options have been prepared having regard to the following guidance and documentation:

National Planning Policy Guidance and Statements

PPS 1: Creating Sustainable Communities sets out the Government's vision for planning and key policies and principles which should underpin the planning system. Its aim is to deliver development in a sustainable way.

PPS 3 Housing sets out the Government's policies on the provision of housing. The aim is to ensure that everyone should have the opportunity to have a decent home. There should be greater choice and mix of housing, and more sustainable patterns of development on previously developed land and at higher densities.

PPG 4 Industrial, commercial development and small firms states that boroughs should

- provide for choice flexibility and competition and aim to ensure sufficient land is available readily capable of development for these uses and well served by infrastructure:
- ensure that there is a wide variety of sites to meet differing needs
- ensure businesses are located appropriately to transport facilities, goods and services
- ensure businesses are located to reduce the need for travel and achieve sustainability objectives
- ensure businesses that can be carried out with few environmental effects should not be separated from the communities they serve.

PPS 25 Development and Flood Risk.

The Council is currently preparing a Strategic Flood Risk Assessment for the borough as required by PPS 25 Development and Flood Risk. It will be necessary to undertake the sequential test and where applicable, an exception test, and consider

the flood risk vulnerability of land uses required by the document (see Annex D) for those sites that are identified in this document as being in areas not within Flood Risk Zone 1. Development Proposals for land In Zones 2 and 3 should be accompanied by a Flood Risk Assessment. Refer to Annex E of PPS 25 for these requirements. The Flood Risk Areas quoted in this document are taken from the Thames Gateway London Partnership Strategic Flood Risk Assessment of East London June 2005.

Regional Plans and Statements

The London Plan is the regional spatial strategy for Greater London and applies to 33 boroughs including Lewisham. The London Plan has been prepared by the Mayor of London and is the strategic plan setting out an integrated social, economic and environmental framework for the future of London over the next 15 – 20 years. The Plan integrates the physical and geographic dimensions of the Mayor's other strategies, including broad locations for change and providing a framework for land use management and development, which is strongly linked to improvements in infrastructure. LDF policies need to be formulated to be in general conformity with the policies in the London Plan.

The London Plan Policy 3B.1 Developing London' economy seeks to support and develop London's economy by seeking a range of sites and premises, and meeting the needs of different sectors and markets Policy 3B.5 Strategic Employment Locations (SEL) promotes and manages the varied industrial offer of the Strategic Employment Locations as London's strategic reservoir of industrial capacity, and that Boroughs should develop local policies for employment sites outside the SELs. Policy 3B.9 Creative industries states that the needs of key creative industries will be identified and will seek to retain them in London. Existing clusters of these uses should be protected and developed. Policy 3B.11 Environmental Industries states that land and premises in appropriate locations should be identified and safeguarded to secure capacity for environmental industries and facilities for recycling and reprocessing of waste.

Industrial Capacity Draft Supplementary Planning Guidance to the London Plan September 2003

This Guidance proposes that for sites outside the Strategic Employment Locations Lewisham falls in an intermediate category called 'Limited Transfer of poorer industrial sites'

East London Sub Regional Development Framework (SRDF)

The SRDF supports the implementation of the London Plan. It brings together a wide range of data and information about East London and makes suggests issues that Boroughs might need to address in their Local Development Frameworks and other planning policy documents.

Lewisham's Core Strategy Development Plan Document

The Preferred Options for Employment Land reflect the Preferred Growth Options put forward in the Core Strategy. (paras. 4.1.1. – 4.1.3). The Strategy proposes that a

major growth corridor will be focussed on the Catford, Lewisham and North Lewisham areas. These locations form the borough's main contributions to the Thames Gateway are considered to be optimal locations for encouraging active change through significant regeneration and intensification of built development. The spatial strategy proposes to restructure the allocation of employment land in Lewisham into Strategic Employment Locations (SELs), Local Employment Locations (LEL) and Mixed Use Employment Locations (MEL). (see para. 4.4.2).

Community Strategy and Other Council Documents

The Community Strategy has been prepared by the Lewisham Strategic Partnership in consultation with the London Borough of Lewisham. The Strategy deals with the economic, social and environmental well-being of the Borough and seeks to improve the quality of life in Lewisham. The main areas in which land in employment use supports the borough's Community Strategy are by providing services and variety to the local economy which supports the Strategy's action of fostering enterprise and sustainable business growth including the creative industries and regeneration (secure the sustainable regeneration of Lewisham, its housing, transport and environment).

The Creative Lewisham strategy intends to increase the scope within which the creativity of people in Lewisham can operate. Stimulating and supporting creative enterprise will assist in the regeneration of the borough's economy. This approach is seen as central to addressing the social inclusion and neighbourhood renewal agendas, giving people the opportunity to experience and participate in creativity and, opening up avenues of both employment and self-expression.

North Lewisham Master plan

This background study of the urban form of North Lewisham examines the strengths, failings and opportunities represented by the area and develops a strategic place-making vision for the area.

Employment Land Survey and Review was carried out in November/December 2005.

Lewisham Commercial Property Study 2005

This study concluded that there was strong demand for office properties, and good availability of low cost sites for smaller businesses, which appear to be meeting demand with increasing success in the Borough. Sectors that are prospering include retail, secondary office uses, creative industries and catering. The Borough's property land offer varies with location. The study identified that there is currently a lack of stock to meet current demand for commercial property, especially for freehold sites and for retail and office uses. Real and perceived issues for businesses in the Borough which undermine the Borough's commercial land offer include crime, a poor quality environment, congestion, limited parking and limited public transport. As a result tenants are often poor quality and new businesses frequently unsuccessful, though this may be changing.

Planned development of transport at certain localities as part of the Thames Gateway initiative was considered to offer wide ranging benefits. The continuing availability of low cost sites allows the Borough to be a location for initiative and enterprise as start-up businesses locate in the Borough.

Without improvements to the issues identified above, the Borough may not be able to attract and retain the high quality businesses which would bring economic and social benefits to the area. The study concluded that at present Lewisham cannot compete with some locations nearer to the centre of London and there is a danger that, in some parts of the Borough especially, failure to address the above issues will seriously weaken Lewisham's commercial land offer.

Deptford was considered to have an advantageous location which will need the investment for redevelopment if it is to raise its potential and shed its poor image.

Lewisham Economic Development Business Plan 2004

This document provides an extensive study of the Borough's local economy, future business growth skills, workforce, 'Creative Lewisham and the identification of clusters of these uses', property, town centre development and other issues such as environment and infrastructure. The study identifies the importance of clusters of creative industries for Lewisham supported by the presence of Goldsmiths College and the Laban Centre both recognised as leading institutions with international reputations for cultural studies and the arts and dance. The document also identifies gaps and weakness in property provision in Lewisham and the scope of development opportunities on employment sites. It identifies a general shortage of small business space.

EMPLOYMENT ISSUES

3.8.1 PROTECTION OF EMPLOYMENT LAND

This issue concerns employment land in the borough and the balance that needs to be struck between social and economic regeneration (particularly in the north of the borough), provision of housing, and the requirements of the London Plan to provide for London wide functions (support for the City, waste etc). Employment land can be defined as strategic (designated through the London Plan) and local (designated by LB Lewisham).

Table E1 below summarises the preferred employment designations for identified employment land.

A. Strategic Employment Locations

Surrey Canal Bromley Road

B. Local Employment Locations

Evelyn Street Creekside

Endwell Road

Blackheath Hill

Clyde Vale/Perry Vale

Lewisham Way

Malham Road

Manor Lane

Plough Way/Marine Wharf

Stanton Square

Willow Way

Worsley Bridge Road

C. Mixed Use Employment Areas

Arklow Road and Childers Street

Oxestalls Road

Plough Way/Yeoman Street

Surrey Canal Road/Stockholm Road/Bolina Road

Grinstead Road

Convoys Wharf

Kent and Sun Wharf

D. Other Employment Locations

E. Local Labour Agreements

Table E1 Summary of Preferred Employment Designations

The preferred options for each area of employment land within the borough is discussed below.

3.8.2 STRATEGIC EMPLOYMENT LOCATIONS

The London Plan designates two Strategic Employment Locations (SEL) in the Borough of Lewisham. These Locations are the Surrey Canal Strategic Employment Location and the Bromley Road Strategic Employment Location. SELs as defined in the London Plan, provide land important for London as a whole for uses such as waste transfer and processing (including recycling), warehousing, and industrial and service businesses.

The Broad Policy and Site Options

Two broad options for SELs were put forward as apart of the Issues and Options consultation.

- 1. Maintain the current Strategic Employment Locations boundaries. These boundaries are proposed by the Greater London Authority (GLA) in the East London Sub Regional Development Framework.
- 2. Remove or add sites to the Strategic Employment Locations as defined in the GLA's East London Sub-Regional Development Framework.

An option to remove employment protection from all sites within the Strategic Employment Locations was not presented as this would not be in conformity with the London Plan.

The Preferred Options

The preferred broad policy site allocation option for the Surrey Canal Strategic Employment Location is Option 2.

The preferred broad policy site allocation option for the Bromley Road Strategic Employment Location is Option 1.

The reasons for these choices are discussed below.

A1 SURREY CANAL STRATEGIC EMPLOYMENT LOCATION

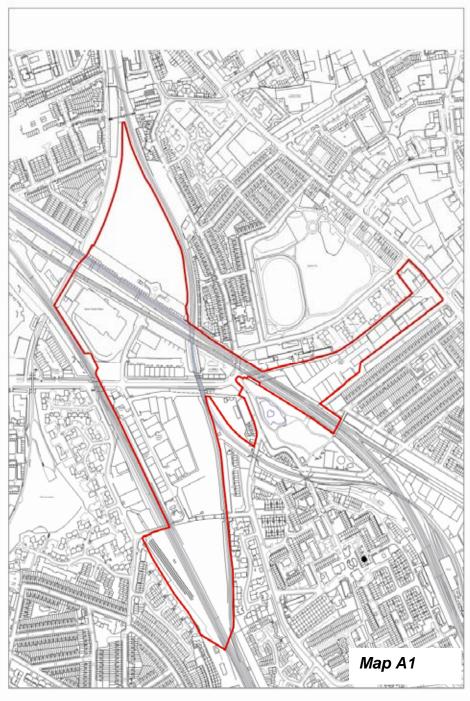
The Surrey Canal area is in the north of the Borough between Evelyn Street and New Cross Road. The site includes waste processing and transfer facilities including the Council's Civic Amenity Site, a combined heat and power station, and other waste transfer and recycling activities. There is the potential for more of these uses to be concentrated at the Surrey Canal location. The so called 'Silwood Triangle' site is currently vacant. The main access to this site is currently via the waste processing sites on Landmann Way off Surrey Canal Road.

The central core of the area (Surrey Canal Road) is serviced via Ilderton Road from the Old Kent Road (A2), which passes through the extensive industrialised areas of the SEL within the adjoining London Borough of Southwark. Access is also possible from Evelyn Street (A200) via Grinstead Road.

The area is poorly served by public transport, but this will improve with the building of Phase 2 of the East London Railway and the construction of a new station at Surrey Canal Road. However access to this area is also rendered difficult due to the

number of railway lines on viaducts that cross the borough, and meet at this location, causing a good deal of severance. This severance will increase in the future as Bolina Road will be closed to road traffic as part of the Thameslink 2000 project. The preferred boundary of the Surrey Canal Strategic Employment Location (SEL) is shown at Map A1.

The location of those sites that will be included in the Surrey Canal SEL, located behind railway viaducts and shielded from residential areas, provides a good location for those industries and processes that do not require good public transport and a high quality environment. This location has the potential of twenty four hour working



Surrey Canal Strategic Employment Location

to supply goods and services to London. This may include general manufacturing process, bakeries, printing etc.

The industrial/warehousing premises on Blackhorse Road are also located within the SEL. These premises have direct access to the A200 at Evelyn Street, represent good quality opportunities for businesses to locate and are located so as to not cause disturbance to nearby residential development.

The sites proposed for the Surrey Canal SEL provide an appropriate location for the functions proposed in the London Plan for Strategic Employment Locations. The Council has reviewed the employment land designation at these locations and considers that the designation of these sites will consolidate and strengthen these functions.

Draft Policy

E1 Surrey Canal Strategic Employment Location

The Council will grant permission for B1 (b), B1(c), B8 and where appropriate B2 uses within the Surrey Canal Strategic Employment Location as defined on the Proposals Map. The Council will grant permission for uses with Class B1(a) when these uses are ancillary to light industrial, general industrial or warehousing uses.

Permission for other uses will only be granted in the following circumstances:

- (a) Uses considered to enhance the business and industrial functioning of the area
- (b) Uses considered ancillary to the business and industrial functioning of the area.

New developments that will intensify the business and industrial functioning of the area, which are appropriate to this location and do not conflict with other relevant policies in this plan will be welcomed.

Residential developments will not be granted planning permission in Strategic Employment Locations as they are considered to have an adverse impact on the continuing industrial functioning of these areas.

E2 Surrey Canal Strategic Sites for Waste Uses, New Waste Uses and Relocation of Waste Uses

Existing waste processing and transfer sites in the Surrey Canal Strategic Employment Locations are considered suitable for continuation in these uses and planning permission will not be granted for changes of use. The preferred location for new and relocated waste transfer and processing uses will be the Surrey Canal Strategic Employment Location subject to meeting the appropriate environmental constraints for these uses as set out in Policy SE17.

Reasons for the Preferred Option

Consistency with National and regional planning guidance

The Policy is in accordance with National Planning Policy Guidance (PPG 4) that requires local authorities to retain a supply of employment land and with the London

Plan which requires the maintenance of a supply of employment land to meet the strategic requirements of London. The London Plan states that Strategic Employment Locations perform a strategic function by providing a reservoir of business and industrial uses for the whole of London. These locations will also provide the land to enable all the waste arising from London to be handled within the Metropolitan boundary. It outlines that the extent of these locations should be specified in local planning documents and that the areas should be kept under review to ensure that the right locations are being safeguarded. Strategic Employment Locations in the London Plan fall into two categories: Industrial Business Parks for businesses requiring a high quality environment and preferred Industrial Locations for those with less demanding requirements. The Strategic Employment Locations in Lewisham fall into the category of Preferred Industrial Locations.

The London Plan also requires that all London's waste needs to be dealt with within the Metropolitan boundary as the landfill sites in Kent and Essex will no longer be available (as well as new European directives). Policy 4A.3 'Criteria for the selection of sites for waste management and disposal states that criteria should be used to identify sites and allocate sufficient land for waste management and disposal including proximity to the source of waste, nature of activity proposed and its scale, environmental impact including noise, emission, odour and visual impact, transport impact, and primarily use sites located on Preferred Industrial Locations or existing waste management locations.'

The Sub Regional Development Framework East London states that Strategic Employment Locations are East London's strategic reservoir of land for industrial activities and that they should be designated in development plans. Other than as part of a strategically coordinated process, development of significant non-business uses within them should be resisted. Structured land release from SELs could be on the basis of the distribution of vacant and occupied industrial land, development proposals, especially those associated with Opportunity and Intensification areas, and the scope for viable locational substitution of industrial provision.

Community Strategy and other Council documents

The Council's Community Strategy, specifically enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

The Council's Core Strategy states that these locations are the core of the former industrial area where a variety of business uses are located. In accordance with London Plan policy 3B.5 the Council will safeguard sites and business in the SEL for business and waste related uses.

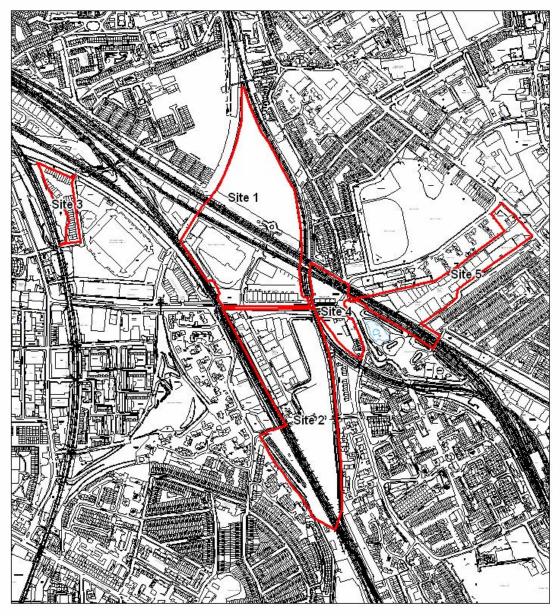
The Lewisham Economic Development Business Plan states that there is an opportunity for creating an environment industries cluster at this location. The area contains most of the remaining industrial activity and storage and distribution in the borough, a large number of converted railway arches and the SE London Combined Heat and Power (SELCHP) plant.

Issues and Options Consultation Report

Consultation responses, including the Greater London Authority, were in favour of retaining these locations. Comments included:

- Adjustments might be necessary but that the overall amount of land should not be diminished
- If sites have outlived their usefulness they would be better used for other purposes
- Small and Medium Enterprises and creative businesses should be protected and where a site is removed from a SEL the preferred use is open space.

What alternatives were considered and why they were rejected
The option to maintain the existing boundary of the Surrey Canal Strategic Location as defined in the East London Strategic Development Framework was rejected. It was considered that some of the sites in the location were poorly used, no longer contributed to the strategic functioning of Lewisham by reasons of the uses located on them, and lack of investment in their physical fabric. It was considered that the opportunities for the regeneration of the north of the borough that would be presented by taking a strategic approach to those sites no longer considered suitable for this role outweighed the advantages of retaining these sites in the Strategic Location. This is discussed in more detail in respect of each site formerly included in the Strategic Locations and now allocated as a Mixed Use Employment Site as the Preferred Option. It is considered that the sites designated as the SEL are suitable for these uses and will strengthen and consolidate these functions.



Map A2 SITE OPTIONS: SURREY CANAL STRATEGIC EMPLOYMENT LOCATION

Site 1: Waste Transfer Site at Landmann Way,

British Wharf and Gemini Industrial Estates and Silwood Triangle Site 2:Elizabeth and Juno Way Industrial Estates, Lewisham Vehicle Pound

and Railway Land at Juno Way and Cold Blow Lane

Site 3:Bolina Road-Enterprise Industrial Estate

Site 4:Apollo Business Centre and Trundleys Road Industrial Premises Site 5:Deptford Trading Estate and other premises on Blackhorse Road,

Ocean Wharf, Grinstead Road and Evelyn Street

SPECIFIC SITE OPTIONS FOR THE SURREY CANAL STRATEGIC EMPLOYMENT LOCATION

The following sites (see Map A2) were considered in the Issues and Options paper to perform the core functions of the Surrey Canal Strategic Employment Location:

Site 1. Waste Transfer Sites around Landmann Way including South East London Combined Heat and Power Station, Hinkcroft Skips, Civic Amenity Site, British Wharf and Gemini Industrial Estates, Silwood Triangle

Site 2 Elizabeth Industrial Estate, Juno Way Industrial Estate, Lewisham

Vehicle Pound and railway lands at Juno Way and Coldblow Lane

Site 3 Bolina Road (Enterprise Industrial Estate)

Site 4 Apollo Business Centre and other industrial premises on Trundleys

Road

Site 5 Deptford Trading Estate and other industrial/office premises on

Blackhorse Road, Ocean Wharf, Grinstead Road and Evelyn Street.

The options presented for the above sites were:

Option 1: Retain sites in current employment use

Option 2: Other appropriate uses if it was thought their use should change

Option 3 (part of Site 2): A local resident proposed that part of the railway land at Coldblow Lane and Juno Way should be developed for housing.

SITES 1, 2, 4, AND SITE 5 (PART) DEPTFORD TRADING ESTATE BLACKHORSE ROAD, AND EVELYN STREET

The Preferred Option

The preferred option for these sites is Option 1 retention within the Strategic Employment Location, and also Option 1 for the railway land at Coldblow Lane and Juno Way.

Reasons for Preferred Option

These sites were considered to perform the core function of the Strategic Employment Location, due to their appropriate physical location many of which are located behind railway embankments and viaducts, the nature of the uses on these sites, and their potential to locate waste functions.

What Alternatives were considered and why they were rejected
The alternative option of proposing their change of use or redevelopment was not considered to be appropriate for these sites which perform the core functions of the Strategic Employment Location and are appropriately sited.

SITE 3 BOLINA ROAD INDUSTRIAL ESTATE AND SITE 5 (PART) GRINSTEAD ROAD/OCEAN WHARF SITE

The Preferred Option

The preferred option for Site 3 Bolina Road (Enterprise Industrial Estate) and Site 5 (part) Grinstead Road/Ocean Wharf Site is Option 2 to propose alternative uses.

These are discussed below in Section C Mixed Use Employment Areas of this Report.

Reasons for Preferred Option

These sites were considered to perform a more peripheral employment function. Site 5 is partly vacant and presents a poor quality environment on an important site adjacent to Deptford Park. It is understood that the site is also badly contaminated. It was considered that designation as a Mixed Use Employment Area would increase the employment contribution from the site, remedy the obvious disadvantages to the environment, and make a positive contribution to the street scene. Site 3 Bolina Road is a small purpose built industrial estate adjacent to Millwall Football Stadium. Car repair uses and small storage/warehousing facilities predominate. The Council considers that the stadium and adjacent areas have the potential to act as a catalyst for the transformation of this area of North Lewisham which is poor in environmental quality. This site which is also close to public transport at South Bermondsey Station is considered to be important in achieving regeneration aims for North Lewisham.

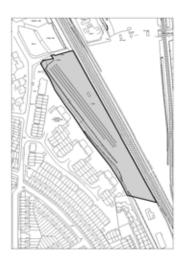
What alternatives were considered and why were they rejected
The retention of employment uses on these sites was not considered to outweigh the
potential benefits of allowing mixed use development on these sites as part of an
overall regeneration strategy for these areas.

RAILWAY LANDS AT COLDBLOW LANE/JUNO WAY

A consultation response to our initial request for suggestions for sites to be developed stated that this site within the Strategic Employment Location could be used for residential development once the construction of the East London Railway has been completed.

The Preferred Option

Retain Current Use as Operational land for Network Rail within the Strategic Employment Location



Reasons for Preferred Option

The site will not be available for redevelopment in the short and medium term - see comments from Network Rail below.

Issues and Options Consultation

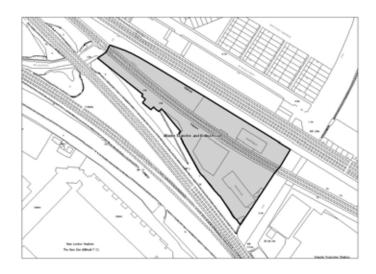
Network Rail replied that the site suggested for residential development forms a discrete parcel on the eastern side of the railway line. The site's location is strategic in that it will be useful for the construction of the East London Railway New Cross Gate Flyover, or the Thameslink Bermondsey Dive Under. The future use of

the land will be reassessed at the completion of these projects. Network Rail has no objection to this land being allocated for future housing development, should it become surplus to the need of the operational railway. It will not, however, be available in the medium term and it may be more appropriate to leave consideration of its future use until a subsequent review of the employment allocations.

What alternatives were considered and why were they rejected
An alternative use (Option 3 housing) was proposed for this site. This was rejected
for the reasons described in the Issues and Options Consultation response
discussed above.

WASTE TRANSFER SITE AT BOLINA ROAD

The waste transfer site at Bolina Road was considered in the Issues and Options consultation document to be potentially suitable for addition to the Strategic Employment Location as the uses were suitable and in a location where these activities could appropriately be carried out. An option was presented to include the site within the SEL (Option SEL 1).



The Preferred Option

To exclude the site from the Surrey Canal Strategic Employment Location.

Reasons for Preferred Option

The option to include the site in the SEL is not practicable as the Thameslink 2000 project now has approval, and is programmed for construction in 2012. This

site will be required by as part of the construction of the project for the Thameslink Bermondsey Diveunder and the current occupiers will be given notice to quit. After the construction the new line will take up most of the site and vehicular access from the north along Bolina Road will no longer be possible. Pedestrian and cycle access will be maintained.

What alternatives were considered and why were they rejected Not relevant to this site.

OTHER SITES: -ROLLINS STREET/STOCKHOLM ROAD, ORION BUSINESS CENTRE, OXESTALLS ROAD, CHILDERS STREET, ARKLOW ROAD

The Preferred Options

The above sites described in the East London Sub-Regional Development Framework as potentially falling within the Surrey Canal Strategic Employment Location were considered in the Issues and Options Paper to perform a more peripheral function relative to the functioning of the SEL. The option to include these sites within the Strategic Employment Location is not the Preferred Option. The Preferred Options for these sites will be discussed further in Section C Mixed Use Employment Areas.

A2 BROMLEY ROAD STRATEGIC EMPLOYMENT LOCATION

The Bromley Road area is in a suburban location and differs greatly in function and character from the Surrey Canal SEL. The boundary is shown on Map A2. There is a Conservation Area directly adjacent to the western boundary of the location on the A21. The boundary directly adjoins the industrial area and is intended to provide an extensive buffer for the residential area on the other side of the A21. The western boundary is separated from housing by a railway line. Road and public transport connections are excellent. The A 21 is directly accessible to the site, which also has several bus routes. The site is close to the two rail stations at Catford and the station at Bellingham. The River Ravensbourne runs through the area.

The Bromley Road SEL performs an important function for the south of the borough as it is . the only substantial block of land remaining in industrial and commercial use, and also provides important public utility facilities (bus garage and police garage). In order to enhance the local business functioning of the borough and for the maintenance of the functioning of London as a whole, it is important that these uses are maintained and intensified. It is considered that the area has a vital role to play in providing necessary land for the continuation and intensification of public utility facilities and also small business units which are in short supply in the southern part of the borough.

Draft Policy

E3 Bromley Road Strategic Employment Location

The Council will continue to support the important utility uses, and industrial/ warehouse units in this area by refusing planning permission not within the B Use Class. The Council will consider favourably:

- (a) new or intensified public infrastructure developments;
- (b) extension to the bus garage; and
- (b) B1/B8 uses and where appropriate B2 industrial or warehousing units.

The Council will support the removal of residential uses within the Strategic Employment Location and its replacement by developments within the B Use Class. Applications for changes of use within shop units on the local parade will be dealt with by the relevant shopping parade policy, although applications to change the use of any shop to residential will be resisted as these uses are considered to impact on the continued industrial functioning of the area.

Consistency with National and Regional Planning Guidance See comments for Surrey Canal Strategic Employment Location

Community Strategy and other Council documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

The Council's Core Strategy states that these locations are the core of the former industrial area where a variety of business uses are located. In accordance with

London Plan policy 3B.5 the Council will safeguard sites and business in the SEL for business uses.

Issues and Options consultation

Respondents were broadly in favour of continuation of employment use. One of the respondents also considered waste processing to be suitable and another considered that some parts of the location might be suitable for other uses such as housing, or mixed use commercial and housing.

What alternatives were considered and why they were rejected

The option to remove or add sites to the Bromley Road Strategic Employment Location was rejected. The Bromley Road Strategic Employment Location is the largest remaining area of employment land in the south of the borough and so retaining sites at this location is particularly important for ensuring the overall functioning of London. The site is surrounded by suburban development and there are not sites suitable or available for adding to the location.

Options for alternative uses on the Bromley Road SEL were also presented during the Issues and Options consultation:

Option 2: Waste processing

Option 3: Promotion of other uses such as 100% housing, mixed use commercial and housing



transport route
which already sees
a high volume of
traffic. Any waste

Option 4: - Other use suggested as part of the Issues and Options consultation
Option 2 was

dismissed as it was considered that waste use would make a negative impact on this largely suburban location. However the Bromley Road SEL is a large site and it might be possible to locate waste uses there in the future. The site is also on a main

Bromley Road Strategic Employment Location

use would need to have no negative impact on the adjacent Conservation Area.

Option 3 was dismissed as the site represents the single largest reservoir of employment land in the south of the borough which will provide valuable facilities for the functioning of London. The introduction of largely residential uses into an important employment areas would reduce the amount of land available for these uses and have an impact on the continuing industrial functioning of the area.

3.8.3 LOCAL EMPLOYMENT LOCATIONS

Local Employment Locations (LELs) are coherent areas of land in employment uses, are considered to be in sustainable locations and as far as possible do not provide undue disturbance to residential property or other noise and pollution sensitive uses nearby. They provide goods and services important to the local economy and thereby contribute to sustainability objectives. Employment land in the Borough is in short supply. The Council needs to protect as much of this land as possible and where possible intensify business uses on these sites. Locally LELs are usually comprised of purpose-built industrial/commercial 'sheds' but some of the areas have non-standard buildings that may be difficult to convert to a modern business use. These buildings may be suitable for redevelopment to provide cheaper premises for creative and cultural industries or for 'start-up' businesses.

The former designation of these sites in the Lewisham unitary Development Plan (2004) was 'Defined Employment Area' (DEA).

The Broad Options for all Local Employment Locations

Three broad options were put forward as part of the issues and options consultation.

- 1. Retain all Local Employment Locations in employment use.
- 2. Remove policy protection from employment sites and allow redevelopment for other uses.
- Release some Local Employment Locations on the basis of criteria including the physical quality of the site, value in enhancing the local economy and providing jobs.

Four options for alternative uses in the Defined Employment Areas were put forward as part of the issues and options consultation should the decision be to remove employment area protection from a particular site.

- 1. 100% residential development.
- 2. Mixed Use commercial and residential with affordable housing with community facilities such as schools, surgeries etc.
- 3. 100% affordable housing.
- 4. Create new affordable employment floor space using S106 planning obligation contributions from large new developments.

These options, and the précis of alternative options will be discussed on a site by site basis below.

The Preferred Broad Policy Option

The preferred option is to proceed with a combination of broad options 1 and 3 and a combination of the alternative uses depending on a site's location.

The employment areas included and listed below have been assessed under option 3 and are considered to meet the requirements for continuation in employment use.

These areas are:

- Evelyn Street
- Creekside
- Endwell Road
- Blackheath Hill
- Clyde Vale/Perry Vale
- Lewisham Way
- Malham Road
- Manor Lane
- Plough Way
- Stanton Square
- Willow Way
- Worsley Bridge Road.

Two of the former Defined Employment Areas Goodwood Road Defined and part of the Plough Way Defined Employment Area designated in the Unitary Development Plan were reviewed, and considered to not meet the criteria for designation as Local Employment Locations. The reasons for this are discussed below.

Molesworth Street and Engate Street Defined Employment Areas which are located within the boundary of the Lewisham Town Centre Action Area Local Plan and are discussed within that document.

Draft Policy

E4 General Policy: Local Employment Locations

The Council will seek to protect business and industrial uses in the Local Employment Locations. Permission will be granted for uses falling within the B Use Class for these sites. Specific guidance as to the which category of B Use Class is acceptable for individual areas can be found in the area specific policies below. Proposals to intensify the business uses in these areas will be welcome provided this does not harm the amenity of any adjacent uses that might be sensitive to noise or pollution creating activities.

Permission for residential development will not be granted as it is considered that this will affect the continuing industrial functioning of the area.

Reasons for the Preferred Option

Consistency with National and regional planning Guidance

The Policy is in accordance with National Planning Guidance (PPG4) that states that boroughs should:-

- Provide for choice, flexibility and competition
- Ensure that there is a wide variety of sites to meet differing needs

 Businesses should be appropriately located to transport facilities, goods and services and their business catchment area.

Businesses should be located to reduce the need for travel and achieve sustainability objectives

It also states that many business can be carried on with few environmental effects so it may not be appropriate to separate them from the communities they serve.

The London Plan (Policy 3B 5) states that boroughs should identify local policies for

The London Plan (Policy 3B.5) states that boroughs should identify local policies for employment sites outside the Strategic Employment Locations having, regard, to location, accessibility, quality and fitness for purpose, and the release of surplus land for other uses in order to achieve the efficient use of land in light of strategic and local assessments of industrial demand.

Community Strategy and other Council documents

The Council's Community Strategy, specifically Enterprise and business growth – to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

The Council's Core Strategy supports the designation of Local Employment Locations which are the residue of business clusters located throughout the borough that are considered to be coherent areas suitable for continued business use.

Employment Land Review

The Employment Land Review concluded that many of the Defined Employment Areas were well located, fit for purpose and well used. These areas have been included in the Local Employment Location designation.

Issues and Options consultation

Responses supported broad option 3 and that decisions on the future of Defined Employment Areas should be taken on a case by case basis but the overall area devoted to employment uses should not be diminished. Mixed use was the most supported alternative use.

The GLA considered this to be a local matter and that decisions should be taken as a result of a supply and demand study. Replacement uses should be appropriate to location and need and decided on a site-by-site basis.

What alternatives were considered and why they were rejected

Option 1: Retain all Local Employment Locations in employment use. This option was rejected has it might result in the retention of employment sites that were no longer in substantive employment use, and result in the retention of sites on older and outdated buildings to the detriment of the economy and the physical environment.

Option 2: Remove policy protection from employment sites and allow redevelopment for other uses. This option was rejected as it would result in the loss of employment sites that are in short supply in various parts of the borough and which would result in a reduction in the variety in the local economy and the

availability of local services to the detriment of the overall sustainability of the Borough. Local demand studies and land use surveys have consistently shown a high demand for smaller commercial premises over several years.

B1 PLOUGH WAY LOCAL EMPLOYMENT LOCATION

This policy refers to that part of the Plough Way Defined Employment Area comprising a stationery factory and Marine Wharf as shown on Map B1. The rest of the Defined Employment Area is proposed to be included as a Mixed Use Employment Location that will be dealt with in Section C of this chapter. The stationery factory is a relatively newly built factory with good road access and facilities. It is occupied by a large local employer, Marine Wharf is a modern office building with its own parking and servicing facilities.

The Options

Five options for alternative use were put forward as part of the issues and options consultation:

Option 1. Retention in employment.

Option 2. 100% housing.

Option 3: 100% affordable housing.

Option 4: Mixed use housing (50% affordable housing/commercial).

Option 5: Other use or mix of uses.

The Preferred Option

The preferred option is to proceed with Option 1 Retention in employment.

Draft Policy

E5 Plough Way Local Employment Location

The Council will grant permission for uses within the B1, B8 and where appropriate B2 Use Class for this site. Proposals to intensify or diversify the office uses on Marine Wharf will be welcomed.



Plough Way Local Employment Location

Reasons for the Preferred Option

Consistency with National and regional planning guidance and Community Strategy and other Council documents
Refer to comments under the general Local Employment Location Policy above.

Employment Land Review
This site comprises modern
industrial and office buildings
which are suitable for continued
use. There have been some
complaints from residents in
relation to the night operation and
deliveries to the manufacturing
facility on the site. This is
currently under review.

Issues and Options consultation

One respondent thought the site could be developed for 50% affordable housing/50% commercial. A second respondent considered that the area should be retained in full employment use.

Diagram B1 Plough Way LEL

What alternatives were considered and why they were rejected

Option 2 and Option 3: 100% Housing or 100% Affordable Housing This option was rejected. The site is in full employment use with modern buildings. In these circumstances the need for to meet housing provision targets is outweighed by the employment uses on the sites.

Option 4 Mixed Use 50% Housing 50% commercial. This option was rejected for similar reasons around the existing occupiers of the site. The option would require the redevelopment of the site and the loss of the existing businesses which are considered to make an important contribution to the local economy and job provision. **Option 5:** No other suggestions for using the site were received during the Issues

B2 EVELYN STREET LOCAL EMPLOYMENT LOCATION

Evelyn Street is a small well defined area of fully occupied modern commercial and warehouse buildings with good access directly on to the A200 Evelyn Street.

Options

Four options for alternative uses were put forward as part of the issues and options consultation:

Option 1: Retain in employment use.

Option 2: 100% housing.

Option 3: 100% affordable housing.

Option 4: Mixed Use (50% affordable housing/50% commercial).

Option 5: Other use of mix of uses

The Preferred Option

The preferred option is Option 1, retain in employment use.

Draft Policy

E6 Evelyn Street Local Employment Location

The Council will grant permission for uses within the B1, B8 and where appropriate B2 Use Class for this site. Proposals to intensify or diversify the uses on this site will be welcomed.

Reason for the Preferred Option

Consistency with National and regional planning guidance and Community Strategy and Other Planning Documents

See comments in relation to general policy for Local Employment Locations above.

Employment Land Review

This site is well used with modern buildings and good road access and servicing directly on to the A200 Evelyn Street well served by bus routes. Surrey Quays Underground station is about 500 metres away. The site is well configured in order to minimise disturbance to neighbouring residential development. It is considered that some intensification of business use could therefore take place.

Issues and Options consultation

There was one consultation response. This was in favour of retaining current employment uses on site.



Map B2 Evelyn Street LEL

What alternatives were considered and why they were located.

Options 2 and 3 for housing and for 100% affordable housing were rejected. It was considered that this well functioning employment site should be maintained in this use and in this case outweighed the need for provision of housing.

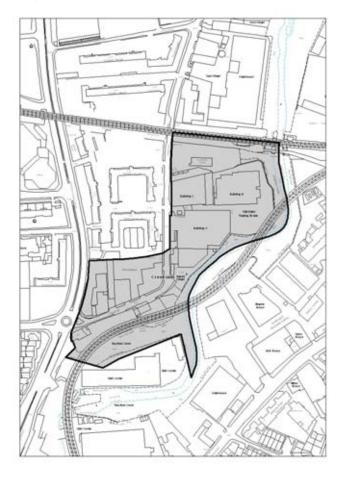
Option 4 Mixed Use Employment and Housing. This option was rejected as it would involve the loss of well used relatively modern well located industrial warehousing buildings and the loss of functioning businesses on the site.

No suggestions were made for other uses on the site.

B3. Creekside Local Employment Location/Cultural Quarter

Creekside falls within the Deptford Creek/Greenwich Riverside Opportunity Area as defined in the East London Sub Regional Development Framework (Greater London Authority). This includes guidelines for an increase in the number of jobs and residential units to this area.





The Docklands Light Railway (DLR) passes directly through the area and makes the development of some small and narrow vacant sites adjacent to the line problematic. The Deptford Bridge and Greenwich DLR stations are close by as is Deptford Station and several bus routes. The site is close to the main road network (A2 and Evelyn Street). There is some constraint on heavier industrial users due to a Local Authority housing estate on the west side of Creekside. The Creek area itself is a site Nature Conservation Site of Metropolitan Importance.

This area contains the following buildings and uses:

Faircharm Industrial
 Estate/Studios: This is a self contained estate comprising

three large multi occupied buildings in a multiplicity of uses, including printing, artists studios and other creative businesses.

- Harold Wharf: This is an older warehouse building that houses an art gallery and studios.
- Nos 2 and 4 Creekside (Evelyn Wharf) are small vacant sites adjacent to the Creek and the viaduct carrying the Docklands Light Railway. Mixed use

- commercial and residential developments on this site have in the past been refused planning permission.
- Nos 1-7 Creekside are a group of older industrial/warehousing buildings in use as an MOT Garage, a Picture Framers and other creative industries, and until recently, an engineering works.

The Council has been promoting this area as a creative hub and many creative businesses are located in this area.

The Options

This area was identified as a creative quarter and the option put forward as part of the issues and options consultation was to 'identify creative quarters where the Council will encourage development of creative enterprises.

Five options for alternative uses were put forward as part of the issues and options consultation:

Option 1: Retention of employment uses.

Option 2: 100% housing.

Option 3: 100% affordable housing.

Option 4: Mixed Use 50% (affordable housing/50%/commercial use).

Option 5: Other use or mix of uses.

The Preferred Option

The preferred option is to proceed with the creative quarter option and Option 1 retention of employment uses which supports the identification of a creative quarter.

Draft Policy

E7 Creekside Local Employment Location

The Council will support the continuation of creative industries in the Creekside Local Employment Location. Applications for small business units and managed workspaces in this area within the B Use Classes will be welcomed.

Development should improve the structure, environmental quality and appearance of the Creek walls and take account of the Environment Agency's requirements for building near flood defences.

Reasons for the Preferred Option

Consistency with National and regional planning guidance
See comments for general Local Employment Location policy above.

Community Strategy and other Council documents

The Lewisham Economic Development Business Plan considers how to sustain and develop the creative cluster it identifies at Creekside, and states that Deptford is seen by commercial agents as a potential future hub for creative arts businesses pushed out from Central London area which have become too costly for designer makers. It considers that to fully consolidate the creative cluster in the area some available sites

need to be specially earmarked. The Council considers that this option, by protecting land in employment use supports this aim.

Employment Land Review

The Employment Land Review concluded that this area is suitable for continued industrial use.

Issues and Options consultation

Responses received in favour of releasing that part of the area that is currently vacant for reasons of transport access and also the Faircharm Industrial Estate. The site was considered to provide an important nucleus for creative industries but that they are notoriously fickle. Alternative uses that might be considered would be a 50:50 mixed use that would regenerate the area and by replacing older buildings.

What alternatives were considered and why they were rejected

Options 2 and 3 housing or 100% affordable housing as this would remove an important feature of the local economy and a major plank in the Council's policy of retaining and promoting creative industries in the Creekside area. In this instance the retention of the employment uses in the area was considered to outweigh the need to meet housing provision targets.

Similar comments apply to **Option 4 mixed use commercial and housing**. This option was rejected as the introduction of a substantial residential element would impair the continued industrial functioning of the area, and would not replace the current industrial premises which allow a wide variety of industrial processes to take place with premises that would be appropriate for a similar variety.

Option 5: No suggestions for other uses were received as part of the Issues and Options consultation.

B4. ENDWELL ROAD LOCAL EMPLOYMENT LOCATION

The Endwell Road area comprises a purpose built business centre of 55 small office units, a scaffolding yard and a roofing centre. The business centre has shown high and consistent levels of occupancy and provides small business accommodation in a good environment close to public transport. Brockley railway station is within close walking distance and several bus routes run nearby. The centre is close to Brockley Cross (the focus of a number of development sites in the Site Allocations section of

this report) and the Brockley Local Shopping Centre. The B1 office uses in the area form a useful adjunct to the Local Shopping Centre functions. The western end of the area falls within the Telegraph Hill Conservation Area. The business centre which is adjacent to a railway line would

provide a good neighbour use for nearby residential development. The



scaffolding yard and building centre directly adjoin the rear gardens of houses on Drakefell Road to the north.

Map B4 Endwell Road LEL

The Options

Five options for alternative use were put forward as part of the issues and options consultation:

- 1. Employment.
- 2. 100% housing.
- 3. 100% affordable housing.
- 4. Mixed Use (50% affordable housing/50% commercial).
- 5. Other use or mix of uses.

The Preferred Option

Option 1: Employment.

Draft Policy

E8 Endwell Road Local Employment Location

The Council will grant permission for new B1 (a) uses in this area and will welcome new developments that intensify this use.

New developments will need to take account of the adjacent Conservation Area and not cause any adverse impact.

Reason for the Preferred Option

Consistency with National and Regional planning guidance and Community Strategy and other Council documents

See comments in relation to general policy on Local Employment Locations.

The Site Allocations section of this document allocates sites at Brockley Cross to promote local identity, create a heart to the community, boost the local economy, improve accessibility and the quality of the public realm. The Preferred Option supports this Strategy by providing a high quality site for business uses in support of the local economy at Brockley Cross.

Employment Land Review

The Employment Land Review concluded that employment should be retained on this site.

Issues and Options consultation

Responses favoured retaining current employment uses on site.

What alternatives were considered and why they were rejected

Options 2 and 3 Housing or 100% Affordable Housing. These options were rejected. Although housing development at this location adjacent to a conservation area would act to improve the overall quality of the environment and contribute to

housing provision targets, it was considered that this well used business centre with modern premises should be retained as a Local Employment Location.

Option 4 Mixed use commercial (50%) and Housing (50%) was considered as potentially an option for this site as part of the Local Employment Location is occupied by a scaffolding yard and building materials centre which are both uses which do not enhance the environment at the location close to the centre of Brockley. However the business centre is successful and the Council preference would be to see similar development on the rest of the site which would contribute to the vitality and viability of the Brockley Cross Local Centre in accordance with the Strategy outlined for sites in Brockley in the Site Allocations section of the document.

BLACKHEATH HILL, CLYDE VALE/PERRY VALE, LEWISHAM WAY, MANOR LANE, STANTON SQUARE AND WILLOW WAY LOCAL EMPLOYMENT LOCATIONS

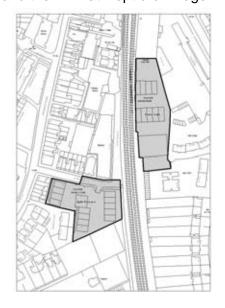
These areas are considered to present similar location and functional characteristics. They are therefore covered in one policy.

B5. BLACKHEATH HILL LOCAL EMPLOYMENT LOCATION

Blackheath Hill is a relatively modern business estate providing small units for which there is local demand in Lewisham. The uses fall largely within Use Class B1. Access is directly from the A2 where regular bus routes run. The area is located within 15 minutes walking distance of Railway stations and the DLR at Deptford Bridge.







Map B6 Clyde Vale/Perry Vale LEL

B6. CLYDE VALE/PERRY VALE LOCAL EMPLOYMENT LOCATION

The Clyde Vale/Perry Vale area comprises two small purpose built estates of modern commercial units within the boundary of the Forest Hill Town Centre. The units are considered to be suitable for their current uses and do not to pose problems to adjacent occupiers. The area shows a consistently high level of occupation, which is close to the A205 South Circular Road, Forest Hill railway station and several bus

routes. The area is in the south of the borough where employment land of this nature is in short supply.

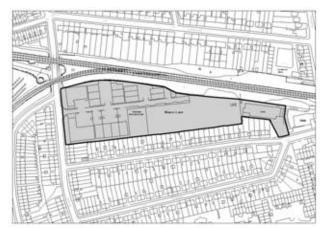


B7. LEWISHAM WAY LOCAL EMPLOYMENT LOCATION

Lewisham Way is a purpose built small modern business estate with good direct road access from the A20 Lewisham Way. Several bus routes pass close by and New Cross rail station is within 10 minutes walking distance. The estate has shown continual high levels of occupation with vacancies seldom occurring.

B8 MANOR LANE LOCAL EMPLOYMENT LOCATION

Map B8 Manor Lane LEL



Manor Lane is a small purpose built estate of high quality warehouse/commercial units plus a timber merchant. The area was recently extended with new high quality warehouse units. Access to the road network is good and very close to the A205 South Circular Road. The area is close to Lee railway station and bus routes. The site is adjacent to residential uses to the south and west. Residential

uses to the north are separated from the estate by the railway line. The size of the units coupled with the configuration of the buildings and the predominance of B1 and B8 uses means that the estate does not pose any difficulty to surrounding occupiers. B2 uses (car repairs) have been limited in their operating hours. This is the only substantial area of high quality employment premises in the south west of the borough.

B9. STANTON SQUARE LOCAL EMPLOYMENT LOCATION

Stanton Square is an island site surrounded by roads in the south of the borough at Bell Green. It includes a small industrial estate with modern commercial units and servicing facilities and some single storey buildings comprising a printer and a scaffolding yards. Road access is good and several bus routes pass close by. It is within walking distance of Lower Sydenham railway station.

Map B9 Stanton Square LEL



B10. WILLOW WAY LOCAL EMPLOYMENT LOCATION

Willow Way is a small area in the south of the Borough and provides a mixture of premises supplying local services as well as a Council depot/office. A small high quality estate also supplies small, quality industrial units. The area is associated with a local shopping parade on Kirkdale and Dartmouth Road. Surrounding uses also include the local police station. It is close to several bus routes and is approximately equidistant between Forest Hill and Sydenham railway stations. Road access is via A2216 Dartmouth Road to Sydenham Road.

Map B10 Willow Way LEL



B11. WORSLEY BRIDGE ROAD LOCAL EMPLOYMENT LOCATION

This area is an extension within Lewisham of a much larger commercial/industrial area within the London Borough of Bromley. The area supplies a mixture of purpose built office and industrial/ workshop units. Access is close to the A2218 Southend Lane and Stanton Way via a suitable road. There is residential development in the road, but the types of use in the Employment Area, which includes a high proportion of B1(a) are not considered to represent difficulties to neighbouring residential



occupiers. Public transport is close by with Lower Sydenham Railway Station directly adjacent to the site and various bus routes at Bell Green a short walk away.

The Options

Five options were put forward for each of these sites as part of the Issues and Options consultation:

Option 1: Employment.
Option 2: 100% housing.

Option 3: 100% affordable housing.
Option 4: Mixed Use 50% (affordable

housing/50% commercial).

Option 5: Other use or mix of uses.

Map B11 Worsley Bridge Road LEL

The Preferred Option

The preferred option is to proceed with Option 1, retention in employment use for Blackheath Hill, Clyde Vale/Perry Vale, Lewisham Way, Manor Lane, Stanton Square, Willow Way and Worsley Bridge Road Local Employment Location.

Draft Policy

E9 Blackheath Hill Local Employment Location Clyde Vale/Perry Vale Local Employment Location Lewisham Way Local Employment Location Manor Lane Local Employment Location Stanton Square Local Employment Location

Willow Way Local Employment Location

Worsley Bridge Road Local Employment Location

The Council will approve new developments which increase the intensity of the current uses in these areas. Permission for non B Use Classes, that do not support the continued industrial/commercial functioning of these areas will be refused.

Reason for the Preferred Option

Consistency with National and Regional planning guidance and Community Strategy and other Council documents

See comments relating to general Local Employment Location policy.

Employment Land Review

The Employment Land Review concluded that these sites should be retained in employment use.

Issues and Options Consultation

One respondent stated that the Clyde Vale/Perry Vale Defined Employment Area should be retained in employment use because of good transport links. Another respondent considered there would be scope for development for mixed use 50% commercial and 50% housing development.

Five responses were made directly referring to Stanton Square Employment Area. Four of these responses were in favour of retention of employment uses. One of these responses thought the at the uses should be for small and medium enterprises (SMEs) and Live/work. The fifth response was in favour of removing employment land protection and that it should be reallocated for mixed use development including residential and commercial floor space. This was because they considered the site was more suitable for residential use, would meet housing supply requirements, and improve the amenity of the area.

One response was in favour of maintaining protection on the Endwell Road Defined Employment Area.

Two responses referred to the Manor Lane Defined Employment Area, both of which were in favour of retaining industrial uses.

Two responded replied to questions on the Willow Way Defined Employment Area both stating that the area was suitable for employment purposes.

Three responses referred specifically to the Worsley Bridge Road Defined Employment Area as being suitable for continued employment use.

What alternatives were considered and why they were rejected

Options 2 Housing and 3 100% Affordable Housing were both rejected for these sites. These sites represent coherent and generally well used industrial and commercial areas, in good condition, and with good transport links. All except one are in the southern half of the borough where employment land of this nature is in particularly short supply. The sites contribute to the vitality and viability of the local economy and thereby the sustainability of the borough. This is considered to outweigh the need in this case to make provision for meeting housing targets.

Option 4 50% housing and 50% commercial development was also rejected.

This option would lead to the loss of significant variety in the economy. Especially in light of the short supply of this type of land in the south of the borough. Some of these sites are of such a size that commercial development would need to be located on the ground floor of any mixed use scheme rather than being able to achieve a separation of uses which would mean that some of the uses on these sites would be lost.

Option 5: Other uses for these sites were not suggested during the Issues and Options consultation.

B11. MALHAM ROAD LOCAL EMPLOYMENT LOCATION

Malham Road is a well defined area adjacent to the South Circular Road (A205) in Forest Hill. Servicing by road is excellent. The area is close to public transport facilities with Forest Hill Station within walking distance and bus routes running along the South Circular. The area is surrounded by residential property, however, the configuration of the site which routes traffic through Wastdale Road and mainly along Malham Road means traffic movements on surrounding residential streets are limited. The frontage on Wastdale Road and part of the frontage on Stanstead Road comprises three storey terrace buildings with shops or commercial premises on the ground floor with residential above. A recent development on the Wastdale Road frontage (turning the corner onto Malham Road) comprises a new flatted development with commercial live work units on the ground floor associated with the redevelopment of premises on Malham Road for B Class Uses.

The buildings vary between purpose built estates of small commercial units with their own servicing facilities, to larger modern units for single firms, and a new self storage facility. There are a small number of older buildings. Uses in the buildings are varied and provide a range of services and employment opportunities. Vacancy rates as recorded in surveys are generally low.

The existing residential uses are considered to be compatible with the continued industrial functioning of the area as they are located on the margin of the site either in small flats above shops or a purpose built residential development specifically designed to be compatible with a redevelopment of older industrial/commercial buildings.

The Options

Five options for alternative uses were put forward as part of the issues and options consultation.

- 1. Employment.
- 2. 100% housing.
- 3. 100% affordable housing.
- 4. Mixed Use (50% affordable housing/50% commercial).
- 5. Other use or mix of uses.

The Preferred Option

The preferred option is to proceed with option 1.

Draft Policy

E10 Malham Road Local Employment Location

Except in cases of replacement of existing residential development and shop premises, the Council will refuse applications for development that do not fall within the B Use Class order.

Proposals to intensify uses within the B Use Class order will be welcomed provided they do not harm surrounding residential areas. Applications for changes of use of the shop premises will be dealt with by the relevant local shopping parade policy.

Reason for the Preferred Option

Consistency with National and Regional planning guidance and Community Strategy and other Council documents

See comments for general policy for Defined Employment Areas.

Employment Land Review

See introductory comments.

Issues and Options consultation

There were two response specifically referring to the Malham Road. Both responses were in favour of retaining the area in employment use.

What alternatives were considered and why they were rejected.

Options 2 Housing and 3 Affordable Housing were dismissed as the site is in continuing employment use and forms a locally important reservoir of commercial and industrial land in the south of the borough providing a variety of size and type of premises. Surveys of the Area show consistent high levels of occupancy.

Option 4 Mixed Use (50% affordable housing/50% commercial) was rejected for similar reasons and because the introduction of a large element of housing would reduce the industrial and commercial functioning of the site.

Option 5 No suggestions for other uses were made during the Issues and Options consultation.





B12. GOODWOOD ROAD EMPLOYMENT AREA

The Goodwood Road area is close to New Cross Gate railway station and comprises two older warehouse/factory buildings, and a small business estate with purpose built units. Access is from New Cross Road (A2) via a wide road and the turn to and from the A2 is limited. The area also a block of student accommodation with B1/D1 business units on the ground floor which replaced an older warehouse building. The business units have now been occupied by health facilities and are no longer in commercial use.

The Options

Six options were put forward as part of the issues and options consultation report:

- 1. Retain current employment uses on the site.
- 2. Allow redevelopment for 100% housing.
- 3. Allow redevelopment for 100% affordable housing.
- 4. Allow redevelopment for Mixed Use (50% affordable housing/50% commercial).
- 5. Town Centre uses.
- 6. Other use or mix of uses.

The Preferred Option

The preferred option is to proceed with a combination of Options 1, 5 and 6. This effectively means that this area will not merit Local Employment Location designation.

Map B12 Goodwood Road LEL



Reasons for the Preferred Option

Consistency with National and regional planning guidance

The Policy is in accordance with National Planning Guidance (PPG 4) that requires local authorities to retain a supply of employment land.

The London Plan states that boroughs should

develop local policies for employment sites outside the Strategic Employment Locations having regard to:

- The locational strategy (sustainability criteria)
- accessibility to the local workforce, public transport and where appropriate, freight movement
- Quality and fitness for purpose of sites.

The release of surplus land for other uses in order to achieve the efficient use of land in light of strategic and local assessments of industrial demand.

The Industrial Capacity Draft Supplementary Planning Guidance to the London Plan September 2003 proposes that for sites outside the Strategic Employment Locations Lewisham is in the category of 'Limited Transfer of poorer industrial sites.' This is an intermediate category between those boroughs which are encouraged to adopt a particularly restrictive approach to the transfer of industrial site to other uses (Restrictive Transfer), and those boroughs in the 'Managed Transfer' category that generally have a greater supply of vacant industrial sites relative to demand.

Community Strategy and other Council documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

Employment Land Review

The Marlowe Business Centre clearly provides some small premises for businesses which provide services and goods to the local economy. There are proposals from the owners to redevelop the site as a business centre and thereby to re-provide some business premises on site. There are also two buildings on Goodwood Road (Bond House and Blundell House) that are currently in a variety of business uses. One of the warehousing buildings on Goodwood Road was redeveloped to provide Class B1 or D1 units on the ground floor and cluster flats for students above. The ground floor units have been developed as health care facilities with no B1 uses. The area is considered to present a generally poor urban environment close to New Cross Gate station which represents an important gateway to the Borough to Goldsmiths College and the evening economy of New Cross. The station will also become more important with the development of the East London Railway. The site is close to public transport – New Cross Gate station has surface rail to London Bridge and Croydon and is also a terminus for the East London Railway. Several bus routes pass along New Cross Road at this point.

Goodwood Road is wide and obviously suitable in itself for goods vehicle access. However access is somewhat constrained by the fact that approach along New Cross Road is only possible going from west to east as it is not possible to make a right turn into Goodwood Road.

On balance it was considered that the area no longer provides suitable uses adjacent to the New Cross town centre or provides a coherent industrial area, as a significant part of it has been lost to other uses, and therefore did not merit designation as a Local Employment Location. The business uses in the area would continue to be protected by policies E19 and 20 for 'Other Employment Sties.'

Issues and Options consultation

Two respondents were in favour of retention of employment on the site in order to keep trades local to London providing a service to the community, and the full capacity of the business units. A third respondent was in favour of redevelopment of

the area (either options 2, 3 or 4) as there were problems with lorry deliveries and complaints from adjacent residents.

What alternatives were considered and why they were rejected.

Consideration was given to designating the area as a Local Employment Location but was rejected as it was considered that part of the site on Goodwood Road no longer met the criteria and that regeneration of a high profile area adjacent to New Cross Gate station, together with redevelopment of the Marlowe Business Centre for uses in the B Use Class would be more beneficial.

3.8.4 MIXED USE EMPLOYMENT LOCATIONS

Introduction

The areas listed below were categorised as Defined Employment Areas in the Lewisham Unitary Development Plan 2004 and some of these were allocated in the London Plan as part of the Surrey Canal Strategic Employment Location. However the sites are considered to represent areas of older and poorer quality industrial use at low densities. Some have suffered from piecemeal development that disrupts the continuing industrial functioning of the area and others have been occupied by uses incompatible with adjoining residential areas. On balance it is consider that the sites represent regeneration opportunities which outweigh the desirability of retention of the existing industrial uses and which could increase the employment contribution of the sites and increase the contribution the sites would make to the Council's strategic regeneration aims.

These sites are:

Arklow Road and Childers Street

Oxestalls Road

Plough Way/Yeoman Street

Surrey Canal Road/Stockholm Road/Bolina Road

Grinstead Road

Convoys Wharf

Kent and Sun Wharf

Two of the sites (Convoys Wharf and Sun and Kent Wharf) were presented in the Site Allocations Issues and Options Paper. The other sites were presented in the Employment Land Issues and Options paper.

These sites have been reviewed in the Employment Land Review and were discussed in the Employment Land Issues and Options paper. It is considered that for a range of site specific reasons they do not perform the core functions of the Strategic Employment Location. Nor does the Council consider that designation of these sites as Local Employment Locations would achieve the strategic aims of the Council for the Major Growth Corridor described in the Council's Core Strategy. Regeneration by mixed use schemes would:

- make the best use of the available land in order to achieve regeneration objectives
- enhance the quantity and quality of jobs offered and maximise the contribution to the local economy and
- accommodate emerging business sectors in the local and London economy.

A fundamental objective and requirement of the redevelopment of these sites is that they will deliver a radical improvement in the physical quality of the urban environment to improve the overall appearance of these areas and to attract further investment to an area of the Borough where the environment is poor, morale is low, and unemployment and levels of deprivation are high.

Many of these sites are in locations that do not connect well with the rest of the Borough. Extensive severance occurs to sites in the Surrey Canal Road area due to the number of railway viaducts that criss-cross the Borough and the physically forbidding nature of many of the routes. Particular problems in this respect occur at Bolina Road, Folkestone Gardens (Trundleys Road) and at Rolt Street. Convoys Wharf in contrast has presented a barrier to access and use of the river frontage. New mixed use development will be expected to improve the connectivity of these sites with the rest of the Borough by providing new access routes to stations etc, improving pedestrian connections and their environmental quality and make contributions to improving public transport facilities and infrastructure, and to the local public open spaces.

The Council's Core Strategy Development Plan Document (para. 4.4.2) discusses the aims for the Major Growth Corridor further. Paragraph 4.1.2 discusses the intended growth scenario for this area.

The Options

Broad Options for all Defined Employment Areas

Three broad options were put forward as part of the issues and options consultation.

- 1. Retain all Defined Employment Areas in employment use.
- 2. Remove policy protection from employment areas and allow redevelopment for other uses.
- Release some Defined Employment Areas on the basis of criteria including the physical quality of the site, value in enhancing the local economy and providing jobs.

Four general options for alternative uses in the Defined Employment Areas were put forward as part of the issues and options consultation should the decision be to remove employment area protection from a particular site.

- 1. 100% residential development.
- 2. Mixed Use commercial and residential with affordable housing with community facilities such as schools, surgeries etc.
- 3. 100% affordable housing.
- 4. Create new affordable employment floor space using S106 planning obligation contributions from large new developments.

These options, and the alternative options that were considered and the reasons for their rejection will be discussed on a site by site basis below.

The Preferred Broad Policy Option

The preferred option for the sites listed below is to proceed with a combination of broad options 2 and 4 and a combination of the alternative uses depending on a site's location, quality and viability. The choice of site for this policy allocation was also considered against the Council's overall strategy for the Major Growth Corridor

in the Core Strategy, and whether the development of the site had the potential to meet these aims

The employment areas listed below have been assessed under Broad Option 3 and are considered to meet the requirements for Mixed Use Commercial and Residential Development. These areas are:

- Arklow Road and Childers Street
- Oxestalls Road
- Plough Way/Yeoman Street
- Surrey Canal Road/Stockholm Road/Bolina Road
- Grinstead Road
- Convoys Wharf
- Kent and Sun Wharf

The Council is proposing a general policy as below to set the general policy framework for development proposals for Mixed Use Employment Areas. Reasons for the choice of the designation of Mixed Use Employment Areas for each specific location, and a discussion of the general options for the Defined Employment Areas are discussed individually below for each area.

Draft Policy

E11 Mixed Use Employment Locations

The Council will encourage development that maximises the employment contribution from these sites in the form of mixed use developments that meet the following criteria:

- (a) provision of a comprehensive redevelopment of the designated mixed use employment area;
- (b) an increase in the number of jobs provided by the site;
- (c) include a proportion of on-site affordable housing;
- (d) improves the environmental quality of the area;
- (e) and improves connections to the rest of the borough including the improvement of existing or provision of new pedestrian routes to public transport services and local facilities.

The development should also;

- (f) provide small business units for starter business such as managed workspace
- (e) contribute to raising the architectural quality of the area
- (f) improve the social and leisure amenities of the area.

Implementation

The Council will require a masterplan to be submitted with applications for planning permission to ensure a comprehensive development of each mixed use employment area, and will consider using Compulsory Purchase powers to ensure a comprehensive redevelopment of each mixed use employment location.

The Council will enter into Section 106 agreements with developers to implement policy CSE 16. Applications will need to be supported by a financial appraisal which will establish the proportion of affordable housing to be provided taking into account the mix of uses on site and any off-site infrastructure requirements necessitated by the development.

Reasons for the Preferred Option

Consistency with National and Regional Planning Guidance

The policy is consistent with National Planning Guidance (PPG 4). Local Authorities should provide for choice, flexibility and competition and ensure that there is a wide variety of sites to meet differing needs. Businesses should be appropriately located to transport facilities, goods and services and their business catchment area. Businesses should be located to reduce the need for travel and achieve sustainability objectives. It also states that many business can be carried on with few environmental effects so it may not be appropriate to separate them from the communities they serve.

The London Plan states that boroughs should develop local policies for employment sites outside the Strategic Employment Locations having regard to:

- The locational strategy (sustainability criteria)
- accessibility to the local workforce, public transport and where appropriate, freight movement
- Quality and fitness for purpose of sites
- The release of surplus land for other uses in order to achieve the efficient use of land in light of strategic and local assessments of industrial demand.

The Industrial Capacity Draft Supplementary Planning Guidance to the London Plan September 2003 proposes that for sites outside the Strategic Employment Locations Lewisham is in the category of 'Limited Transfer of poorer industrial sites.' This is an intermediate category between those boroughs which are encouraged to adopt a particularly restrictive approach to the transfer of industrial site to other uses (Restrictive Transfer), and those boroughs in the 'Managed Transfer' category that generally have a greater supply of vacant industrial sites relative to demand. The Draft Supplementary Planning Guidance also discusses Industrial Capacity and Mixed Use Development in Section 7 of the Report. In paragraph 7.4-7.6 the guidance states that there may be scope to redevelop and upgrade parts of some Preferred Industrial Locations (PILs) in appropriate locations, e.g. on the periphery of PILs near stations or town centres, especially where there is a barrier separating the area from the rest of the PIL. This could enable the consolidation of various uses with different environmental sensitivities. The design of industrial-led, mixed, higher density redevelopment should also ensure that overall there is no net loss of industrial employment capacity within SELs, and that in view of the particular need to increase housing provision, especially of affordable housing will be the key other priority on permissible mixed-use redevelopments. These developments must not compromise the offer of these sites as the main strategic and local reservoirs of industrial capacity. It should support this central policy objective and encourage better use of land such as that which can be brought about by mixed use

redevelopment. It also states that changes to the SELs should take place in the light of local and strategic reviews of industrial land and supply.

The London Plan also identifies 'Areas for Regeneration' (Policy 2A.4) including parts of East London where boroughs and other partners should work to achieve sustained renewal by prioritising them for action and investment. The Plan encourages local authorities to identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing.

Community Strategy and Other Council Documents

The strategy includes the following priority issues for employment land. These are: Foster enterprise and sustainable business growth including the creative industries Secure the sustainable regeneration of Lewisham – its housing, transport and environment.

The strategy also states that Deptford and New Cross, where the majority of the employment locations are situated have a long history of industrial activity. They are the most diverse areas of Lewisham and have changed significantly over the past 30 years. Much of the river-related industry has closed and a great deal of redevelopment has taken place. The area is still home to many of Lewisham's businesses and the creative sector is growing. Regeneration schemes have operated for the last 15 years, making big improvements to the physical appearance of the area and has a very young population. One third of residents are under the age of 19. Nevertheless, Deptford and New Cross are two of the poorest areas of Lewisham and face specific problems. In particular, unemployment, low education attainment, poor health and life-expectancy and crime and the fear of crime. The Council's Spatial (Core) Strategy Development Plan Document (para. 4.4.2) discusses the aims for the Major Growth Corridor further. Paragraph 4.1.2 discusses the intended growth scenario for this area. These aims are considered to support the designation of Mixed Use Employment Areas and the aims for these sites as proposed in the above general policy.

Alternative Uses that were considered and why they were rejected

The alternative options that were considered for each site and the general options that were put forward for the Defined Employment Areas are discussed in relation to each site below.

SPECIFIC POLICIES FOR MIXED USE EMPLOYMENT LOCATIONS

C1. CHILDERS STREET AND ARKLOW ROAD MIXED USE EMPLOYMENT LOCATION (Site Area 2.94 ha.)

The industrial buildings on Childers Street consist of older buildings over four floors that were formerly railway carriage maintenance sheds sandwiched between a railway viaduct and a residential area. An access road to commercial uses in arches under a railway viaduct directly abuts the buildings to the rear. Deliveries to the Childers Street buildings are via a residential road which has caused complaints to one of the major occupiers and therefore operational constraints.

The Arklow Road Estate is a small self contained industrial estate located between



two railway viaducts. The buildings in this estate are suitable for industrial/commercial warehousing use, access within the site for heavy goods vehicles is adequate. The buildings on site are a mix of ages and condition. Some would benefit with renovation or replacement. Access to the site by road is relatively poor and is embedded in a residential area some distance from the major road network.

Other uses close by include a large multi occupied office building in excellent condition (Astra House) and a new live/work development, which are compatible with the location.

One bus route passes close to the

site and the area is within approximately 10 minutes walk of New Cross railway station.

The Issues and Options paper split this area into Childers Street and Arklow Road. The Preferred Options paper will treat these two sites as a single site in order to ensure that development on both sides of the railway viaduct (that splits the site) is coordinated and takes account of the need to ensure the continued functioning of the industrial and warehousing uses in the railway arches.

Opportunities

Most of the buildings on the site are occupied by industrial commercial users, and in their current state are capable of continued industrial use. One of the occupiers in one of the borough's largest employers. The site represents an opportunity to improve connectivity through the area, renew business uses on the site, and also provide an element of residential development. There could be opportunities to renegotiate or redesign the delivery access to the buildings on Childers Street via the access road to the railway arches. The older industrial buildings on Childers Street represent a positive and charming element to the built environment and its loss would cause a change in the local historic character and street scene.

Constraints

Redevelopment could cause the loss of this economic and social benefit, without replacement of equivalent value. The site is fragmented by railway lines which could cause difficulties, so the Council is seeking a comprehensive treatment. Road haulage delivery constraints exist along Childers Street.

The Options

The following use options were put forward for these areas as part of the issues and options consultation.

Childers Street and Arklow Road

Option 1: Retention in employment use (retain as Defined Employment Area).

Option 2: Remove protection and allow redevelopment for other uses.

Option 3: Release Defined Employment Areas on the basis of criteria.

Option 4: Mixed Use (employment/housing).

Option 5: Mixed Use (employment/live work units, housing)...

Option 6: Create new affordable floorspace by requesting contributions from large new developments.

Childers Street only

Option 7: Housing.
Arklow Road only

Option 8: Housing/community facility.

Option 9: Mixed Use development of Donway Building on Arklow Road – a redevelopment comprising B1 employment space and live/work units in a new building. Arklow Trading Estate should be redeveloped to comprise B1 employment space and 'mixed tenure' (i.e. a proportion of affordable housing) residential accommodation. (Suggested in the initial consultation process requesting sites to be brought forward).

The Preferred Option

The preferred option is a combination of Options 2, 3, 4 and 6 for both areas. Diagram C1 illustrates a possible layout of the site that meets the Council's objectives. These plans do not preclude the submission of other designs that might meet the Council's requirements equally well but are given as a starting point for discussion.

Draft Policy

E12 Arklow Road/Childers Street Mixed Use Employment Location

The following developments would be acceptable in this area:

New developments considered suitable on this site will be a combination of the following uses:

- (a) Intensifications of uses within the B1 (a) B1 (c) Use Class
- (b) Creative industries which could take advantage of the format of some of the existing buildings
- (c) New small business units
- (d) Residential use.

The Council will require a comprehensive redevelopment of this site based on a Masterplan. Development should take measures to reduce the severance caused by the railway lines traversing the site, by the use of imaginative design solutions, and provide through routes to enable the linking of the site to the wider area. This will require negotiation with Network Rail and Spacia (or their successors) to ensure the appropriate handling of the business/warehousing units in the railway arches, and their continued functioning in business/industrial/warehousing use.

Employment uses should provide accommodation for creative uses and new small business units.

Any new development should maximise the employment contribution on the site. Any proposed live/work developments on this site would need to be considered on their merits and demonstrate that appropriate design and management measures have been undertaken to ensure their continuance in business use.

Existing buildings in the Arklow Road and Childers Street areas are considered to be capable of re-use and refurbishment and applications for their redevelopment will need to demonstrate that such a comprehensive approach will deliver significant benefits beyond their retention.

Reason for the Preferred Option

Consistency with National and regional planning guidance Community Strategy and other Council documents

See comments relating to general policy on Mixed Use developments. Mixed use redevelopment is in accordance with the above policy is considered to meet the following aims (see Para 4.4.2 Core Strategy):

- Creating local employment opportunities
- Enhancing local identity
- Providing concentrated areas of activity
- Enhance connectivity and contribute to the regeneration of the area
- High quality master planned development
- Place making and linkages between the site and open space areas.

Issues and Options consultation

There were five responses on the future of the Childers Street portions of the site. One respondent was in favour of retention of the current employment uses on site. Four respondents were favour of a mixed use development on the site, including an element of residential development.

Eight respondents replied to the consultation on the Arklow Road portion of the site. One respondent was in favour of retention of the current employment uses on the site. One respondent was in favour of a new mixed use development involving employment and residential. Three respondents wrote in favour of a similar proposal also including an element of live/work development.

Employment Land Review

The Review concluded that the site is still well used and capable of re-use for commercial and industrial development in its current form, although the buildings could be up-dated and there are delivery problems along Childers Street associated with the large mail fulfilment house located there. See comments in the introduction above.

What alternatives were considered and why were they rejected

Option 1: Retention in Employment Use. This option would retain the sites in current employment use using either the existing buildings or buildings up-dated and modernised.

The site does provide a reasonable environment for businesses in that the Arklow Road Estate is self contained with servicing within the site, situated behind railway viaducts Childers Street is less favourably located in that as it is currently arranged lorry deliveries have to take place directly off a residential street. These buildings also require more up dating and maintenance. On balance it is considered that a mixed use scheme involving a comprehensive redevelopment of the site would make the best use of the area, improve the environment for adjacent residential, and maximise the employment contribution from the site including meeting the general objectives described in the reasons for the Preferred option. This option was therefore rejected.

Option 5: Mixed Use (employment/live work units, housing). This option was rejected as it was considered to potentially introduce too great an element of residential development into what is at the moment a functioning employment area by presenting these units as an alternative to employment uses, and would not be so positive in promoting the aim of maximising employment contribution from the site. The chosen option allows for the possibility of live/work units but in circumstances that ensure their continued business use.

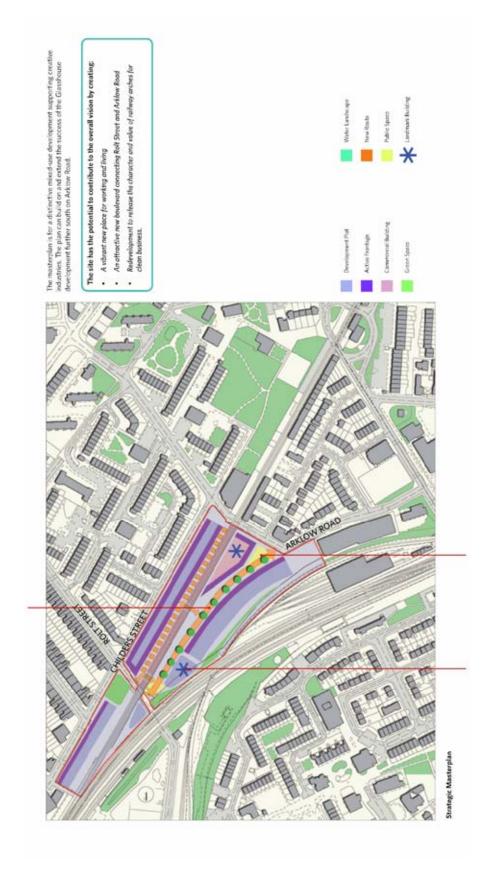
Option 7 (Childers Street only) Housing. This option was rejected as it was considered that this site was capable of retaining an employment use.

Option 8 (Arklow Road only). Housing and community use. This option was rejected as it was considered that the site was capable of continuing employment use.

Option 9 – (Donway House at Arklow Road Only) Mixed Use development. This option was rejected in favour of an option that ensures a comprehensive treatment of the Arklow Road and Childers Street Area.

Flood Risk Area

Zone 3 High probability of flooding with low to medium residual risk.



C1 Illustrative Masterplan for Arklow Road/Childers Street
Mixed Use Employment Location

C2. OXESTALLS ROAD MIXED USE EMPLOYMENT LOCATION (Site Area 4.92 hectares)

This substantial area bounded by Oxestalls Road, Grove Street, Dragoon Road and Evelyn Street (A200) has premises and land of widely varying quality and use. Crown Wharf and Diploma Works: This comprises an older building that has been converted to provide live/work units and a metal/car recycling firm. The metal



recycling use has resulted in complaints from neighbouring occupiers on the Pepys Estate and provides a poor environment for nearby residential uses.

- New Baltic Wharf: This area has purpose built warehouse buildings and a large yard suitable for the use of lorries. It is used for haulage and a public utility depot.
- Evelyn Street: Warehousing and wholesales uses predominate along this frontage together with a Car Auctions Site and petrol filling station and mini-supermarket.
- Victoria Wharf is occupied by various car repair and car valeting firms and has very poor environmental quality and
 Dragoon Road: The part of the

site has modern warehousing buildings which were relatively recently converted to a self storage facility.

Opportunities

The site in the past has been in fragmented ownership which has precluded a comprehensive approach to its development and management. Comprehensive redevelopment would provide an opportunity to radically improve the social, physical and economic quality of the area, benefit local residents by removing environmentally unfriendly uses, an increase in the number of jobs on the site which at the moment only provides in the region of 40-50, and a contribution to housing provision. Other opportunities presented by the site include the reopening of the former Surrey Canal to provide a high quality landscape feature/public open space and a link through to a similar landscape feature at the Mixed Use Employment Location at Plough Way. This could provide coherence, physical linkages and integration to a large area of the north of the borough that is inaccessible and physically forbidding.

Constraints

The site is likely to be contaminated through various industrial uses and the material used to fill the course of the former Surrey Canal. The remains of the former Surrey Canal Bridge obscure sightlines on Evelyn Street/Dragoon Road for oncoming traffic restricting access from Dragoon Road from Grove Street only.

The Options

Eight options were put forward as part of the issues and options consultation.

Option 1:Retention in Employment Use.

Option 2: Remove protection and allow redevelopment for other uses.

Option 3: Release Employment area on the basis of criteria.

Option 4: Housing.

Option 5: Mixed Use (employment, housing, community use).

Option 6: Waste Management.

Option 7: Option put forward by the landowner of 125-127 Bridge Wharf, land in Evelyn Street and Victoria Wharf Grove Street proposing a mixed use development.

Option 8: Create new affordable floorspace by requesting contributions from large new developments.

The Preferred Option

The preferred option is a combination of Options 2, 3 and Option 5 Mixed Use Employment Housing Community Use, together with Option 8. Diagram C2 illustrates a possible layout of the site that meets Council's objectives. Other development proposals might be equally valid in meeting the Council's requirements for this site.

E13 Oxestalls Road Mixed Use Employment Location

The Council will require a comprehensive approach to redevelopment to provide on this site:

- (a) a mixed use development that increases the employment generating capacity of the site;
- (b) small business units in the B1 (a) B1 (c) Use Class and small B8 storage facilities:
- (c) an element of residential development including affordable housing;
- (d) community facility;
- (e) an element of retail space to serve the needs of the development;
- (f) re-opening or re-use of the former Surrey Canal (subject to a feasibility study) in order to provide a high quality public space;
- (g) an increase in access and permeability.

Redevelopment will also need to deal appropriately with the access constraints provided by the bridge over the former Surrey Canal at the junction of Dragoon Road

and Evelyn Street.

Reason for the Preferred Option

Consistency with National and regional planning guidance Community Strategy and other Council documents

See policy references in relation to the general mixed use employment location policy.

London Plan policy 4C.30 New canals and canal restoration supports the restoration of the former Surrey Canal running through the site.

Mixed use redevelopment is in accordance with the above policy is considered to meet the following aims (see Para 4.4.2 Core Strategy):

- Creating local employment opportunities
- Enhancing local identity
- Providing concentrated areas of activity
- Enhance connectivity and contribute to the regeneration of the area
- High quality master planned development
- Substantial new housing
- Place making and linkages between the site and open space areas.

Employment Land Review

The review identified that overall this site is in poor condition, with many buildings in poor repair, and was under used with a low employment density. Some uses on the site were the subject of extensive complaints by local residents. Despite its good location on Evelyn Street (A200) this large site has failed to attract much employment investment over many years.

Issues and Options Consultation

Twelve respondents from the Pepys Estate were in favour of the redevelopment of the Oxestalls Road Site due to environmental problems caused mainly by a metal recycling firm operating on the site. Two of these replies were in favour of option 2 (Housing), seven were in favour of option 3 (Mixed Use, Employment and housing, community use), one was in favour of option 3 or option 5 (landowners mixed use option), and one was in favour of option 5 only. Two other replies from the Pepys Estate were in favour of option 5. One of the respondents was in favour of using the area as an environmental education and job training centre with a nature conservation area.

Suggestions for other uses made by Pepys Estate Residents were as follows:

- Environmental education centre
- Housing
- Housing or park, (get rid of scrap yard)
- Employment and housing, community use
- Employment and housing, community use, 'Pro Green Spaces. No industry.
 Light commercial/workshops and creative industries'
- Playground

- Secondary school
- Housing should always be buffered from heavy and polluting commercial sites.

One respondent was in favour of any of the above options that retained a strong employment representation on the site.

The Greater London Authority were in favour of retaining the site within the Strategic Employment Location.

The New School Campaign preferred a version of option 3 proposing that the site proposed for option 5 should be retained in current employment uses, with part of the rest of the site used for a secondary school. Further housing in the area was not thought necessary.

What alternatives were considered and why were they rejected

Option 1 Retention in Employment Use This option would either involve retaining the current uses on the site or promoting all the site for new business uses or a mix of these. This option was rejected as it was considered that the site has not attracted investment over many years and the current employment uses are low density and cause environmental problems to adjacent residential development.

Option 4 Housing This option would contribute to meeting Housing provision targets and result in an upgraded social and physical environment. The proposed reopening of the Former Surrey Canal as a landscape amenity would be possible under this option. However this option was rejected as it was considered that it would not lead to a sustainable community on what is a relatively large site. Although development at Convoys Wharf will result in more local services and facilities, they will largely be local in nature. Oxestalls Road is therefore considered to merit a mixed use development that will result in a vital and vibrant community. Option 6 Waste Management. This option was rejected for this site. The area is considered to be able to contribute to the Council's Strategic objectives for the Major Growth Corridor by a mixed use development (see reasons above). The Council considers that sufficient waste management sites have been allocated at the Strategic Employment Location at Surrey Canal Road.

Option 7: Option put forward by the landowner of 125-127 Bridge Wharf, land in Evelyn Street and Victoria Wharf Grove Street proposing a mixed use development. This option was rejected in favour of a comprehensive treatment for the whole of the Oxestalls Road are which would meet the Council's objectives.

Flood Risk Area

Zone 3 High probability of flooding with high to medium residual risk.

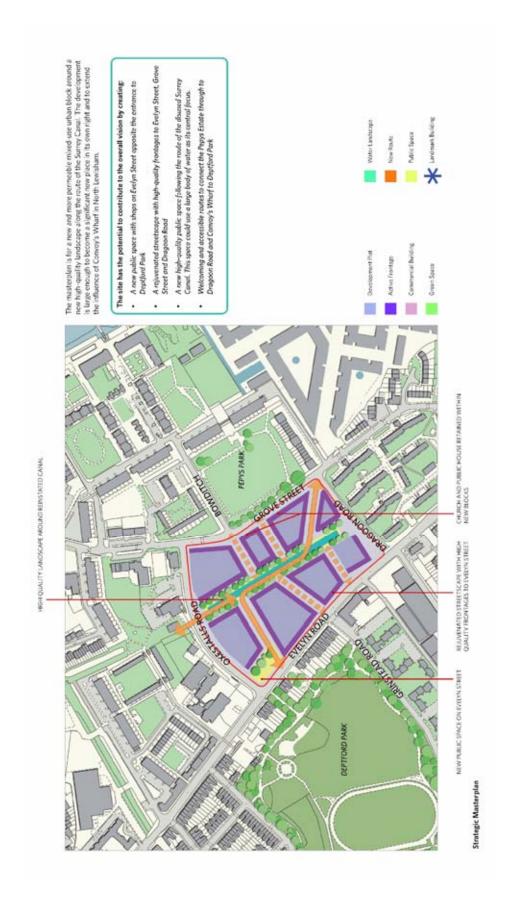


Diagram C2 Illustrative Master Plan for Oxestalls Road Mixed Use Employment Location

C3. PLOUGH WAY MIXED USE EMPLOYMENT LOCATION (Site Area 2.9 ha.)



This area has a mixture of sites, premises and uses as follows:

- Former Salter Paper Works site: This is now vacant and is basically a large empty yard, with open sheds, and with very little built development.
- Transport yards and vacant sites on Yeoman Street:
 These are poor quality and one of the sites appears to have been vacant for some time. Access for heavy goods vehicles on a regular basis is poor and deteriorating because of the increase in lorry size.
- Insulcrete Works comprising of timber yards and assorted small commercial buildings.
- Small commercial buildings on Croft Street.
- Cannon Wharf Business Centre, a former laundry converted to small business units: This centre provides valuable accommodation for small businesses on flexible terms. The building is however poorly designed for this purpose and could be replaced.
- Earl Pumping Station (water utility):
- The former Surrey Canal runs through the site and development (subject to a feasibility study) could facilitate the reopening of the Canal.

The potential of this part of the area to remain in commercial and industrial use has been constrained by new residential development on the boundaries of the area particularly along Croft Street and Plough Way.

The Options

Eight options were put forward as part of the issues and options consultation.

- 1. Retain sites in current employment use.
- 2. Remove protection for business/industrial uses.
- 3. Review appropriateness of retaining the employment area based on a set of criteria.
- 4. Redevelop for 100% housing.
- 5. Redevelop for 100% affordable housing.

- 6. Redevelop as mixed use, housing and commercial development.
- 7. Create new affordable floorspace by requesting contributions from large new developments.
- 8. Mixed Use housing and commercial development suggested by Yeoman Logistics for their site at 19 Yeoman Street.

The Preferred Option

The preferred option is to proceed with a combination of options 3, 6 and 7. Diagram C3 illustrates a possible layout of the site that meets the Council's objectives. Other development proposals might be equally valid in meeting the Council's requirements for this site.

Draft Policy

E14 Plough Way Mixed Use Employment Location

The Council will require a comprehensive approach to the redevelopment of this site to provide::

- (a) Intensification of Uses within the B1 (a) B1 (c) use class
- (b) Replacement of the Cannon Business Centre with small business units
- (c) A mixed use development that replaces the employment uses on the site with a mixture of types of employment, and with an element of residential development
- (d) Re-opening or re-use of the former Surrey Canal (subject to a feasibility study) that passes through the site in order to increase permeability, linkages and recreational opportunities.

The Council will be seeking a comprehensive redevelopment of this site to ensure that valuable existing occupiers can be re-accommodated in appropriate locations within the Mixed Use Employment Area, and to ensure that the opportunities presented by the development to link development of the course of the former Surrey Canal as a landscape/water feature at Oxestalls Road are taken.

Reason for the Preferred Option

Consistency with National and regional planning guidance
See policy references in relation to general mixed use employment area policy.
London Plan policy 4C.30 New canals and canal restoration supports the restoration of the former Surrey Canal running through the site.

Community Strategy and other Council documents

The Council's Community Strategy, specifically in relation to Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

This option is considered to meet the Council's aims in the Core Strategy for the Major Growth Corridor (Para. 4.4.2).

Employment Land Review

See introductory comments above. As noted above in the introductory comments access to the site has become more constrained for some of the uses on site, in particular businesses that require the use of lorries, and the residential uses in the surrounding area are providing more constraints. The review concluded that on balance redevelopment that would increase the intensity of uses, provide a greater mix of business uses, and replace some of the existing buildings with modern facilities, together with residential development would meet the Council's objectives for the site.

Issues and Options consultation

One respondent promoted that mixed use allocation of the Cannon Wharf Business Centre, Insulcrete works the Salter paper works. Replacement of the existing business uses would result in a substantial increase in the number of jobs on site with some 600 jobs proposed (i.e. 3 times the current numbers employed but would only occupy only part of the site). The rest of the site could provide 600 dwellings with about 30% affordable housing, plus a medical centre, and the creation of 'green corridors' in respect of the former railway embankment to the south of the site and the former Surrey Canal to the east. One other respondent proposed a 50% affordable housing/50% commercial development suitable for Small and Medium Enterprises or Live/work units.

The occupier of 19 Yeoman Street proposed either 100% housing for this site or a viable commercial ground floor use which might be a health centre or crèche. One respondent was in favour of retention of employment uses as the area is in full business use.

What alternatives were considered and why were they rejected

Option 1: Retain Sites in current business use. Many of the current employment uses are low intensity, and are of low environmental quality. The Cannon Business Centre is in a building that is becoming outdated for its current use and without further investment the picture would be likely to deteriorate with employment levels falling and the further deterioration of the physical environment. Employment use alone would be unlikely to present the level of investment required to achieve the aims in the Lewisham Community Strategy.

Option 2: Remove Protection from Business uses in the area. Some of the business uses in this area represent a significant benefit to the local economy, and provide valuable space for starter businesses, and local employment. This option was therefore rejected. The preferred option allows for the relocation of businesses within the area.

Options 4 and 5 Housing or 100% Affordable Housing . These options for housing and affordable housing were rejected as there would be no replacement of the important employment activity on this site. Although this would contribute to housing provision targets this would not meet the aims of the physical social and economic regeneration of the borough.

Option 8 Partial Mixed use Redevelopment at 19 Yeoman Street. This option was rejected in favour of a comprehensive treatment for this area which would achieve the significant benefits described.

Flood Risk Area

Zone 3 High probability of flooding with medium residual risk.

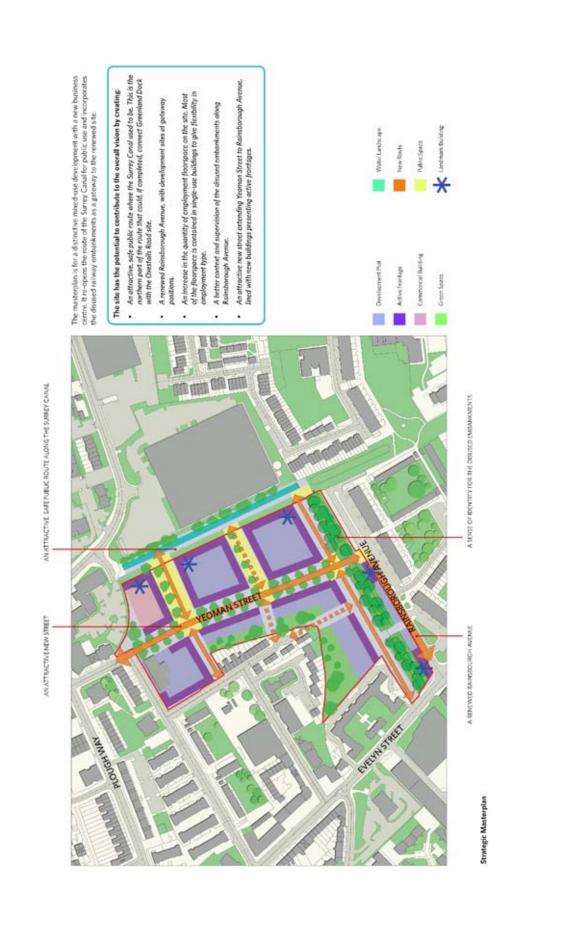
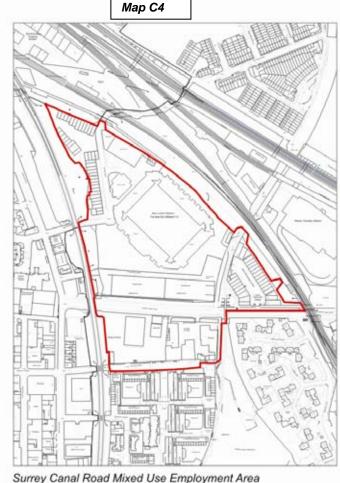


Diagram C3 Illustrative Master Plan for Plough Way Mixed Use Employment Location

C4. SURREY CANAL ROAD MIXED USE EMPLOYMENT LOCATION

This proposed Mixed Use Employment area (Map C4) includes the following sites and premises:

- The Enterprise Industrial Estate Bolina Road which is a small purpose built estate with good servicing, with railway embankments to the east and north and the Millwall Stadium to the east. Car repair uses predominate.
- The Stockholm Road area which forms the southern boundary to the Millwall Stadium area and comprises a strip of land largely taken up by a large warehouse/factory building.
- The Excelsior Estate in the Rollins Street area to the south of Surrey Canal Road which comprises a mix of industrial /warehousing buildings. Some older style multi storey warehouse buildings have received planning permission for live work units, introducing a residential element into this location. The western portion of the Rollins Street area is taken up by a timber merchant (Jewsons) and the area is bounded to the south by a housing estate.
- The Orion business Centre which is a self contained purpose built business centre with good servicing off Surrey Canal Road. It is surrounded by railway viaducts to the east and west and to the south by Surrey Canal Road and beyond is a housing estate. The functioning of the Orion Business Centre will be affected by the arrival of Phase 2 of the East London Railway and the proposed new station at this location.
- Millwall Football stadium and other buildings in leisure use.



Opportunities

Millwall Football Stadium has the potential to form the core of a new location in North Lewisham in an area largely devoid of identifiable features such as local centres, and community and leisure facilities. The stadium is difficult to access from the rest of the borough and the opportunity should be taken in case of development of the surrounding sites as listed above to increase its profile and linkages to ensure it provides maximum benefit to the community. Many of the

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uses in the industrial buildings at this location are low in intensity, and some of the buildings are poor quality. There are some attractive older warehouse/industrial buildings that could be enhanced and contribute to the overall urban quality of the site. Opportunities could be taken both to intensify the business uses the site could offer and to create a 'destination' that could act to focus and attract other regeneration opportunities for sites in this area, leading also to an overall improvement in the quality of the public realm. Opportunities would need to be taken to create a pedestrian friendly environment, raise the profile of Surrey Canal Road as a bus and cycle route and create a recognisable identity for the area. The site is close to South Bermondsey Railway Station and therefore connections in

to the centre of London are good, although the southern and eastern parts of the area are less well served. The proposed East London Railway and station on Surrey Canal Road will provide improved public transport accessibility to this part of the site and the development of the Surrey Canal Road area should contribute to delivering improvements to public transport infrastructure and services. This is has the potential to be a sustainable location to provide high quality dense development. The Orion business centre functions well, but it is considered that the opportunity represented by the new public transport facilities should be taken to increase the density and intensity of the uses offered by the site in order to complement and increase the centre of gravity that would be offered by the development at Millwall.

Constraints

The site is physically isolated by railway viaducts and the physical environment is poor quality, and requires intensive investment. The image of the area is poor and uninviting. Development will need to act to counter these physical constraints. Public Transport along Surrey Canal Road is non existent.

Options for Sites in Bolina Road, Rollins Street/Stockholm Road and Orion Business Centre

Five options were put forward as apart of the issues and options consultation.

- 1. Retention of Bolina Road, Rollins Street/Stockholm Road and the Orion Business Centre in the Strategic Employment Location.
- 2. Mixed Use (commercial/residential/live work) for Rollins Street/Stockholm Road.
- 3. Housing/community use for Rollins Street/Stockholm Road and the Orion Business Centre.
- 4. Waste management use for Rollins Street/Stockholm Road, the Orion Business Centre and waste transfer site at Bolina Road.
- 5. Mixed Use (Employment and Housing) for the Orion Business Centre.

The Preferred Option

The Preferred Option is to amalgamate these sites into one site designation to enable development of the area to be considered on a comprehensive and integrated basis

The preferred option for the Excelsior Industrial Estate Bolina Road and Rollins Street/Stockholm Road will be a mixture of Options 2 and 3. The preferred option for the Orion Business Centre is a mixture of Options 3 and 5.

The Waste Transfer Site at Bolina Road will not be available once the Thameslink 200 Bermondsey Diveunder has been constructed.

Diagram C4 illustrates a possible layout of the site that meets the Council's objectives. Other development proposals might be equally valid in meeting the Council's objectives for this site.

Draft Policy

E15 Surrey Canal Road Mixed Use Employment Location

The Council will require a comprehensive approach to the redevelopment of this site to provide:

- High quality, and high density mixed use business development that contributes to and enhances the Millwall Stadium area as a destination for visitors and for the local community
- The provision of a range of business and commercial development to maximise the employment contribution from the site.

The range of uses that could be accommodated are as follows:

- B1 office and where appropriate B1 (c) development
- Residential development
- Hotel
- Retail development
- Community Facility and/or leisure development.

Opportunities should be taken to

- Enhance the attractiveness and functioning of the existing leisure facilities
- Improve access to South Bermondsey Railway station
- Improve the connectivity of the site to the north and south.

Any new residential development included as part of this mix would need to be carefully designed to enable the continued functioning of the adjacent waste transfer uses within the Strategic Employment Location, and to allow for the functioning of the proposed new East London Railway station.

Reason for the Preferred Option

Consistency with National and Regional Planning Guidance, Lewisham Community Strategy and other Council documents

See policy references under general mixed use Employment Area policy.

Employment Land Review

See introductory comments above.

Issues and Options consultation

One respondent stated that the area should be re-designated for mixed-use redevelopment resulting socio-economic gains to the local community through new employment and regeneration. The development would integrate with and provide regeneration benefits to the Silwood SRB and the New Cross Gate SRB. It would

enable the creation of new areas of public realm and lead to the efficient use of land in a sustainable location for mixed use development including employment, residential and leisure uses.

Other suggestions for alternative uses were:

- mixed use commercial/residential/live work on the Excelsior Estate with employment uses retained on Stockholm Road and Rollins Wharf
- allocate land for housing and community use
- a combination of retention of employment and housing/community use
- retain employment or change to waste management uses.

One respondent stated that light commercial uses should always buffer housing from any heavy industrial uses.

Five responses referred specifically to the Orion Business Centre. One respondent stated that light industrial uses should always buffer residential areas from heavy industrial uses. Three respondents supported mixed use development.

The Greater London Authority comment on all these sites that the boundaries of the Strategic Employment Locations at both Bromley Road and Surrey Canal Road should remain unchanged except in the context of a robust demand study.

What alternatives were considered and why were they rejected

Option 1: Inclusion of these sites within in the Strategic Employment Location.

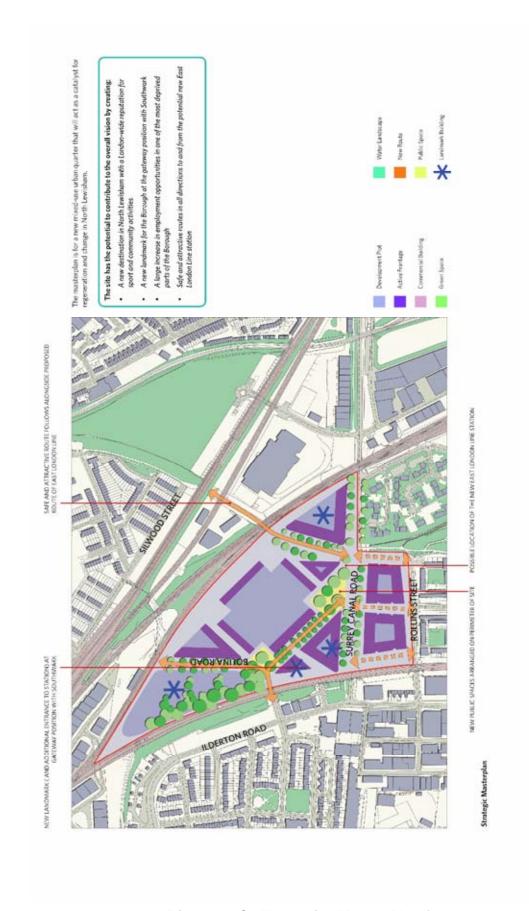
This option was rejected because it was considered that the regeneration benefits that would be afforded by a mixed use development centred on the Millwall Stadium area would outweigh the benefits of retaining the designated employment sites in the current business uses, and being able to treat the site in a comprehensive manner to achieve a balance of uses in pursuit of creating a new destination for this part of the borough that is lacking in facilities. The new development would also provide a range of business uses that would meet local demand for smaller business units, increase the employment contribution from the site and maximise its contribution to the London and local economy. The development would improve conditions and provide facilities for the local housing estates (Silwood and Winslade).

Option 4: Waste management use for these sites.

This option was rejected as it was considered that the Plan makes sufficient waste allocation sites available. The Waste Transfer Site at Bolina Road will no longer be available for this use once work on the Thameslink Bermondsey Diveunder has started. Waste Transfer Use at Rollins Street/Stockholm and Bolina Road areas was considered to be inappropriate due to the existence of a housing estate immediately adjacent to the south of the site, and the potential effect on the leisure uses at the adjacent Millwall Stadium. Waste transfer uses at the Orion Business Centre were thought to be unsuitable as the site is adjacent to the future Surrey Canal Station which will raise the profile of the site as a gateway to the borough.

Flood Risk Area

Zone 3 High probability of flooding with high residual risk.



Diagrams C4 Illustrative Master Plan for Surrey Canal Road Mixed Use Employment Location

C5. GRINSTEAD ROAD MIXED USE EMPLOYMENT LOCATION

Grinstead Road has direct access to the A200 via residential properties and is opposite Deptford Park. The western boundary is provided by a railway viaduct with railway arches. This site comprises a relatively modern vacant two storey office block (Parkside House) although it is in poor condition and has been vacant for some years. The car park for the office block is now used as a scaffolding yard, which limits the potential re-use of the building. Other buildings include various storage and warehousing buildings and the Neptune Chemical Works on Canal Approach. It is understood that the site is contaminated.

The Options

Options for redevelopment of this area were not presented in the Issues and Options Paper. Following a review of sites as part of the Employment Land Review, it is considered that this site (part of which has been vacant for a number of years) should be released for mixed use development in accordance with regeneration objectives as it is directly adjacent to housing, and presents a poor visual appearance in this location adjacent to Deptford Park. This option is considered to meet the Council's aims in the Core Strategy for the Major Growth Corridor (Para. 4.4.2).

The Preferred Option

The preferred option is to allow redevelopment for Mixed Use (housing/commercial). Diagram C5 illustrates a possible layout of the site that meets the Council's objectives. Other development proposals might be equally valid in meet the Council's objectives for this site.

Draft Policy

E16 Grinstead Road Mixed Use Employment Location

The Council will requires a comprehensive approach to the redevelopment of this site to provide:

- Residential development
- B1 (a) or (c) business development.

The development should make a positive contribution to the streetscape at this location which presents a frontage on to Deptford Park and provide a Gateway to the commercial and industrial uses on Surrey Canal Road. The opportunity should be taken to provide a pedestrian and cycle link between Deptford Park and Folkestone Gardens using the railway arches at this location.

Reasons for the Preferred Option

Consistency with National and regional planning guidance
The Policy is in accordance with National Planning guidance (PPG4) that requires
local authorities to retain a supply of employment land.

London Plan

See policy references under General Mixed Use Employment Area policy.

Community Strategy and other Council documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

Employment Land Review and Other Planning Reasons

This site is in a prominent position in that it acts as a gateway to the industrial uses on Surrey Canal Road and is adjacent to residential uses on Grinstead Road and to Deptford Park to the north. The road here is an important crossing point under the mainline viaduct adjacent to Folkestone Gardens.

The site is considered to be poorly used and damaging to the environment at this sensitive location. A relatively modern small office building has been vacant for some years. The buildings are generally of low quality and poor physical condition, requiring considerable investment to make them acceptable directly adjacent to the sensitive residential and park uses, and the site is known to be contaminated. There is easy access to the main road network to Evelyn Street and to the Old Kent Road via Surrey Canal Road and Ilderton Road. The conclusion of the review was that the site should be redeveloped for mixed use commercial and housing in order to improve the environment and increase the site's contribution to the local economy. The development should advantage of the easy access to the main road network, and of its gateway position to the main industrial and commercial uses along Surrey Canal Road.

Issues and Options consultation

One response was received on behalf of the owners of Parkside House on Grinstead Road (part of the site) that the building is run down and in poor condition, presents a poor image to neighbouring residential development, and should be redeveloped for housing.

What alternatives were considered and why they were rejected
The Issues and Options Paper presented this site for inclusion in the Surrey Canal
Road Strategic Employment Location. Following the Employment Land Review this
option was rejected for the reason described above.

Flood Risk Area

Zone 3 High probability of flooding with medium residual flood risk.



Diagram C5 Illustrative Master plan for Grinstead Road Mixed Use Employment Location

C6 Convoys Wharf Mixed Use Employment Location (Site Area 16.96 ha.)

This large site takes up approximately half of Lewisham's River Thames frontage. Wharf uses ceased on this site in September 1999. Part of the site is a protected wharf (protected by two Directions made by the Secretary of State) which means that new developments within that area must use the site as a wharf.

The Options

The option presented for this site in the Site Allocations Issues and Options paper reflected an existing outline planning application for a mixed use development of up to 447,045m² (4,812,110 ft²) comprising:

- Up to 337,980 m² (3,514 units) residential
- Up to 72,730m² employment space including waste recycling and processing facility
- Wharf with associated vessel moorings
- Up to 6,945m² retail
- Up to 3,370m² restaurants/bars
- Up to 23,320m² cultural/community
- Up to 2,700m² leisure
- Provision of up to 2,318 car parking spaces together with revised vehicular access from Grove Street and New King Street

The Preferred Option

Carry forward the uses proposed above. The option is considered to meet the Council's aims in the Core Strategy for the Major Growth Corridor para. 4.4.2) **Draft Policy**

E17 Convoys Wharf Mixed Use Employment Location

Part of Convoys Wharf, as shown on the Proposals Map, is a protected wharf by two Directions made by the Secretary of State for the Environment. New developments within this area must use the site as a wharf, as described in the Secretary of State's directions, and will be referred to the Mayor of London before permission is granted. New development proposals on the protected wharf which do not involve wharf uses will need to demonstrate that the wharf is no longer needed for this purpose. In order to do this the following information will be required:

- (a) the length of time the site has been vacant, and demonstration by any applicant that the site has been actively and appropriately marketed for use as a wharf, having regard to port operator development timescales, together with current and future market demand for such a use;
- (b) environmental impact of any current and future wharf use that may come forward (e.g. aggregates), and the physical suitability of the site for this;
- (c) geographical proximity, and connections, to existing and potential market areas:
- (d) the contribution a development not involving use of the site as a wharf would make to the physical, economic and social regeneration of the Borough, including the number of jobs likely to be created by the proposals.

If the criteria for release of the Protected Wharf from use as a wharf are satisfied, the Council will require a comprehensive mixed-use development that maximises the employment contribution from the site, subject to a detailed master plan to be prepared for the site, involving all the following uses:-

- (a) tourism, heritage and leisure uses, especially those that enhance the riverrelated heritage of the site;
- (b) commercial development especially river related development, including B1, B2 and live-work units;
- (c) high density housing,

In the case of wharf uses remaining on land reserved as a wharf, or on part of the site, or where the site or part of it, is still reserved for use as a wharf, any new development proposed on the rest of Convoys Wharf should not interfere with the operation of the wharf, or prejudice its future operation. New development on Convoys Wharf, outside of the land reserved as a wharf should be, in these circumstances for all the uses identified above, so far as this is consistent with the maintenance of the wharf use. It should also be subject to a detailed Master plan which will include the requirement that the employment contribution from the rest of Convoys Wharf is maximised.

Reasons for the Preferred Option

National and Regional Planning Guidance

Convoys Wharf – Safeguarding Directions

Approximately half the site covered by the Convoys Special Policy Area is designated as a protected wharf. This follows two Directions issued by the Secretary of State for the Environment in 1997 under powers granted in the Town and Country Planning Act 1990 and the General Development Procedure

Order 1995.

Under the terms of the direction under Articles 10 and 14 of the Town and Country Planning (General Development Procedure) Order 1995, before granting permission for an application situated within the safeguarded area the Council must consult with the Mayor of London and Secretary of State.

Map C6 Convoys Wharf Mixed Used Employment Location

London Plan

In para. 5.77 of the London Plan, Deptford Creek/Greenwich Riverside is identified has an opportunity area. It states that 'the



waterside and heritage character of parts of this area coupled with recent public transport improvements give it considerable regeneration potential. The planning framework should build on these assets and historic regeneration investment to sustain the rejuvenation of the area. It should address large scale regeneration opportunities, including parts of Convoys Wharf, as well as harnessing market potential for a cultural quarter to complement similar initiatives nearby and seek additional housing.

Policy 5C.2 Opportunity Areas in East London states that 'taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses'.

The London Plan also identifies 'Areas for Regeneration' (Policy 2A.4) including parts of East London where boroughs and other partners should work to achieve sustained renewal by prioritising them for action and investment. The Plan encourages local authorities to identify areas for regeneration and set out integrated spatial policies that bring together regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing.'

Policy 4C.15 Safeguarded wharves on the Blue Ribbon Network states 'The Mayor will and boroughs should protect safeguarded wharves for cargo handling uses, such as inter-port or transhipment movements and freight related purposes. Temporary uses should only be allowed where they do not preclude the wharf being used for cargo handling uses. Development next to or opposite safeguarded wharves should be designed to minimise the potential for conflicts of use and disturbance. The redevelopment of safeguarded wharves should only be accepted if the wharf is no longer viable for cargo handling. The redevelopment of safeguarded wharves should only be accepted if the wharf is no longer viable or capable of being made viable for cargo-handling.'

Development Strategy for Cargo Handling in the Port of London – Port of London Authority (1988)

This document sets out the Port of London's strategy for the long term protection of suitable port land and a consistent planning policy approach across the length of the Port. The document sets out the PLA's justification for safeguarding key sites and their protection against development that could preclude their future use for Port activities. Annex 5 to the document provides criteria against which a site's suitability for Port activities should be assessed and concludes that 'the assessment should balance these factors against other relevant policy objectives in order to determine the best use of the land in question'.

Community Strategy and other Council documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option. This option is considered to meet the Council's aims in the Core Strategy for the Major Growth Corridor (Para. 4.4.2).

Issues and Options Consultation

No specific consultation responses were received in respect of Convoys Wharf.

What alternatives were considered and why they were rejected

At the time of writing the Issues and Options paper the outline planning application has been submitted to the Mayor of London as part of the normal referral process. This process has not yet been completed. The Council wishes the proposed redevelopment to proceed and has not proposed any alternative options for the site.

Flood Risk Area

Zone 3 High probability of flooding with low/medium residual flood risk.

C7 SUN AND KENT WHARF MIXED USE EMPLOYMENT LOCATION (Site Area 1.4 ha.)

Sun Wharf and Kent Wharf are two contiguous sites bordered on the west by Creekside and on the east by Deptford Creek. Kent Wharf is at the north end of the site and is adjacent to the Laban Dance Centre. Sun Wharf is at the southern end of the site and is bordered by the railway viaduct (with the well known Halfpenny Hatch bridge over the Creek) and, at the southern and is bordered by the railway viaduct which is used by a scaffolding firm. The Creekside Ecology Centre is on the southern side of the viaduct.

The site has the potential to add to the hub of creative industries at Deptford/Greenwich – Cockpit Arts on the site is a well known venue and provider of workspace for creative industries. To the south close by are the Faircharm Studios, and Harold Wharf which provide workspaces and galleries/studios for creative industries.

Kent Wharf is currently occupied by a scaffolding firm and comprises storage sheds and vehicle servicing facilities. Sun Wharf comprises a mixture of sheds and warehouses occupied by a large catering company.

Planning permission has recently been granted for the demolition of the buildings on Kent Wharf and the construction of a part six/part seven storey building to provide commercial units at ground floor level and 63 flats above.

Opportunities

The site has the potential to contribute to the overall vision for North Lewisham by;

- creating an increase in commercial floorspace on the site that will contribute
 to the development of the area as a creative quarter, building on the
 Deptford/Greenwich creative hub and the presence of Cockpit Arts
- building on the presence of the landmark Laban Centre
- taking advantage of a prominent site by the Creek creating a fitting gateway to Lewisham from Greenwich
- contributing to housing provision
- creating greater permeability across the site with access to the waterside, and an improvement to the Creek environment and walls
- providing an attractive new public path along the edge of the Creek.

Constraints

There are some constraints on development connected with the need to create the new path along the Creek, and the presence of flood defences. New Building would need to complement the landmark Laban Centre building. Development of the site is also sensitive due to the adjacent Deptford Creek Site of Nature Conservation Importance which is classified as being of Metropolitan Importance.

The Options

The following options were presented as part of the Site Allocations Issues and Options consultation: -

Option 1: 100% Housing.

Option 2: Mixed Use Commercial and Residential.

Option 3: Promotion of cultural activities and industries.

Option 4: Other option suggested as part of the Issues and Options consultation.

The Preferred Option

Since the preparation of the Issues and Options paper, Kent Wharf, Sun Wharf and Cockpit Arts have been studied as part of the North Lewisham Masterplan project. The site no longer includes Thanet Wharf which will be treated as a whole with proposals for development that cross the borough boundary with Greenwich.

The Preferred Option is proposed to be a combination of:

Option 2: Mixed use commercial and residential

Option 3: Promotion of cultural activities and industries.

Draft Policy

E18 Sun and Kent Wharf Mixed Use Employment Location

The Council will require a mixed use development on this site including

- (a) business development (B1 (a) and (c)
- (b) residential development

The opportunity should be taken to create a pedestrian and cycleway along the Creek edge to form part of the Waterlink Way long distance path.

The Council will enter into S106 agreements with developers to ensure that a proportion of the business floorspace will be retained for use by the Creative industries or will apply appropriate planning conditions to ensure the maintenance of a creative cluster.

Consistency with National and Regional Planning Guidance

The Policy is in accordance with National Planning guidance (PPG4) that requires local authorities to retain a supply of employment land.

London Plan

See also policy references under General Mixed Use Employment Area policy.

Policy 3B.9 Creative industries states that the needs of key creative industries will be identified and will seek to retain them in London. Existing clusters of these uses should be protected and developed.

Policy 5C.2 Opportunity Areas in East London states that 'taking account of other policies, developments will be expected to maximise residential and non-residential densities and to contain mixed uses'.

Community Strategy and Other Council Documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option. The option is considered to meet the Council's aims in the Core Strategy for the Major Growth Corridor (para. 4.4.2).

The Lewisham Economic Development Business Plan 2004 identifies the Creekside area as a location where available sites need to be 'specially earmarked' for creative uses if high quality creative sector inward investment is to be attracted. (para. 7.4.2)

Issues and Options Consultation

One respondent replied in favour of keeping the warehouse and industrial uses on Creekside.

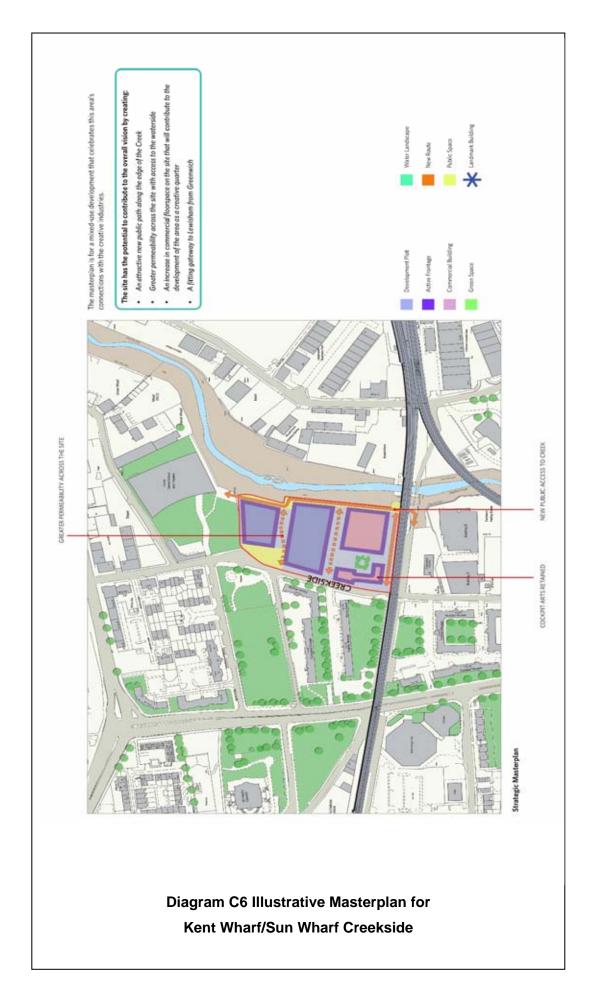
What alternatives were considered and why they were rejected.

Option 1: 100% Housing. This option was rejected. Although it would make a greater contribution to housing provision targets it was considered that a development consisting entirely of housing would not contribute to the character of Creekside, and would not contribute to a cluster of creative industries.

No other options were suggested during the Issues and Options consultation.

Flood Risk Area

Zone 3 High probability of flooding and high/medium residual risk of flooding.



3.8.5 OTHER EMPLOYMENT SITES

There are a number of sites throughout the borough that are located in town centres and residential areas that provide a variety of local business premises and offer employment, and therefore make an important contribution to providing services and variety in the local economy, and also to the functioning of Town Centres. Some of the sites are not well located for the uses taking place on the site and may not always be compatible with surrounding housing.

The Options

Three options were put forward as part of the issues and options consultation.

- 1. Preserve all these sites in business/industrial use.
- 2. Remove protection from these sites and allow redevelopment for mixed use commercial and housing or 100% housing.
- 3. Assess release for other uses on basis of criteria.

The Preferred Option

The preferred option is to proceed with option 3.

Draft Policies

E19 Other Employment Sites

The Council will grant permission for uses within the B Use Class for these sites that are appropriate to the surrounding context.

The Council will grant planning permission for changes of use away from the B Use Class for these premises in the following circumstances:

- (a) The use is not compatible with an adjacent residential environment or other noise sensitive use
- (b) The building has been vacant for at least eighteen months and appropriately marketed for that length of time and evidence is provided to this effect
- (c) The building is not within a town centre as defined on the Proposals Map.

Alternative uses considered will be as follows:

- (a) Office accommodation
- (b) Doctor and dentists surgeries and other similar premises
- (c) Retail premises where the building /site is suitable
- (d) Residential development where surrounding uses are residential.

E20 Other Employment Sites in Town Centre Locations

Applications for redevelopment or change of use should follow the following principles:

- Provide a ground floor B1 commercial use to replace any employment lost in the new development
- Of if the site is within a core/non core shopping area the alternative ground floor use may be a retail use

 Dependent on the nature of the location the upper floors could be office or residential use

Developers should refer to the appropriate retail policy in respect of the Use Class of any proposed retail use.

E21 Office Development

Applications for B1 development, ancillary to existing employment generating uses will generally be granted, subject to conformity with other policies in this Plan.

Reasons for the Preferred Options

The policies are considered to represent a reasonable balance between retaining those sites of value to the local economy, and those which can be usefully changed to other uses including residential development.

Consistency with National and Regional Guidance

These policies are consistent with national and regional guidance (PPG 4 and the London Plan) to ensure a range of employment sites and to develop local policies for their protection.

Community Strategy and Other Council documents

The Council's Community Strategy, specifically Enterprise and business growth - to foster enterprise and sustainable business growth including creative industries, supports the preferred option.

Issues and Options Consultation

Nine responses were received in respect of policy options to release other employment sites on the basis of criteria. The consultation responses on office development were largely directed towards office development in Lewisham and Catford Town centres which are dealt with in the Action Area plans.

What alternatives were considered and why they were rejected

Option 1: Retain all these sites in employment use. This option was thought to be unrealistic and impractical as it would retain some sites that are unsuitable for continued use, and sites that are unattractive elements in the borough. The option was therefore rejected.

Option 2: Remove protection from these sites and allow redevelopment. This option was considered to have unwelcome effects in possibly allowing housing development on sites that would other wise provide local services and vitality and viability to the local economy. This option was therefore rejected.

3.8.6 LOCAL LABOUR AGREEMENTS

The Council has identified the need to enable access to training and jobs for local residents. The Major Growth Corridor identified in the Core Strategy is an area of acute need as evidenced by the Indices of Multiple Deprivation 2004. The deprived wards in Lewisham focus on Evelyn, New Cross, Brockley and Lewisham Central.. Downham and Bellingham in the south of the Borough are also wards where there is evidence of acute need. The ONS Annual Population Survey for 2005 indicated that there are 132,700 economically active people in Lewisham 31% of the resident population are employed within the borough. The remainder work in Central London (43%) while 9% work in Bromley or Croydon.

This highlights the need to create employment opportunities locally to achieve sustainable development, sustain the daytime economy and relieve pressure on the transport system. The policy below is therefore is proposed to help achieve these aims. It is a new policy and has not been consulted on previously.

E22 Local Labour Agreements

The Council supports the employment of local people in the construction or and end use of new developments in the borough

The Council may seek to secure planning obligations on development sites providing over 10 residential units, or over 1000 m² of retail, commercial or industrial floorspace, towards the cost of training local people in the skills and qualifications required to access employment in the construction or and end use phase of the development.

4. SITE ALLOCATIONS

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INTRODUCTION

This section of the document is concerned with site allocations for the Local Development Framework. Site allocations refer to land which is to be identified in the Local Development Framework for a particular proposal (e.g. housing, retail). The purpose of identifying them is to ensure that enough land is available to meet the land use needs of the community. The sites in this document are from various sources.

Existing UDP Site Allocations

These derive from the existing Unitary Development Plan. The UDP was adopted in July 2004 and is therefore up to date. The UDP adoption process means these sites have already been through extensive consultation and independent public examination. However due to the length of time the consultation and examination takes some of the sites in the Plan have now been developed. The sites included in this document are those where development has not yet taken place.

Sites from Supplementary Planning Documents

These sites were not necessarily the subject of site allocations in the Unitary Development Plan. The focus of these documents was to put forward urban design framework to improve the image and vitality of the various areas concerned. A number of uses were suggested for these sites. This consultation paper represents an opportunity to reconsider these sites

Sites suggested as part of the Local Development Framework Consultation Process

An invitation was issued to landowners and members of the community to propose sites that in their view needed redeveloping, and/or their land use in the Unitary Development Plan changed. A number of consultation responses were received. These sites, and the preferred options for their use have been put forward in this document for consideration by the rest of the community.

Sites arising from other Council programmes such as New Deal for Communities

The Council has a number of programmes which might result in new developments in the borough.

Schools Sites

Sites for schools arising from the 'Building Schools for the Future' programme

DEVELOPMENT POLICIES FOR SITE ALLOCATIONS

Proposals for sites need to take into account all relevant development policies in this document. Developers should also refer to the policies in the Core Strategy. Core Strategy Policy CP14 states that the Council, will, when appropriate, use its Compulsory Purchase Powers to assemble sites in order to implement the Spatial (Core) Strategy and other development plan documents.

FLOOD RISK

The Council is currently preparing a Strategic Flood Risk Assessment for the borough as required by PPS 25 Development and Flood Risk. It will be necessary to undertake the sequential test and where applicable, an exception test, and consider the flood risk vulnerability of land uses required by the document (see Annex D of PPS 25) for those sites that are identified in this document as being in areas not within Flood Risk Zone 1. Development Proposals for land in Flood Zones 2 and 3 should be accompanied by a Flood Risk Assessment. Refer to Annex E of PPS 25 for these requirements. The Flood Risk Areas quoted in this document are taken from the Thames Gateway London Partnership Strategic Flood Risk Assessment of East London, June 2005.

IMPLEMENTATION

The Council has defined broad timescales for implementation of these proposals in this document.

Short term - Implementation is expected within 1- 5 years

Medium term - Implementation is expected within 5 – 10 years

Long term – Implementation is expected within 10 – 15 years.

LIST OF SITES



Site 1 - 16 a Algernon Road

Source: Lewisham Unitary Development Plan 2004 (UDP) and 2004 GLA Housing Capacity Study

Site Area: 0.52 hectares

Comments: Currently in use as a MOT Testing Station and rented garages. This is a backland site surrounded by residential development.

Options

The following options were put forward as part of the Issues and Options Consultation:

Option 1: Housing.

Option 2: Continue current use.

Option 3: Other option suggested during consultation.

Preferred Option

Option 2. Continue current use as MOT Testing Station and Garage.

Reasons for Preferred Option

Although the site is otherwise suitable for housing, consultation revealed that the owners of the site were not willing within the plan period to release the site for redevelopment. As the implementation of a housing allocation would not be a practical continuation. As such, its current use was considered to be the only realistic option.

Issues and Options Consultation

57 local residents objected to the option to allocate it for housing, and said that the site should remain in its current use as the business is a good neighbour use, the site provides parking and garaging. The topography of the site also reduced the area available for development. They considered that the nature conservation value of the site was important and the tree covered slopes were a valuable amenity. Two respondents were in favour of housing development. The owners of the business on the site collected many of the forms and forwarded them to the Council.

What alternatives were considered and why they were rejected

Option 1: It was not considered practical to choose Housing as the Preferred Option on this site as the owners are not committed to releasing the site for this purpose.

Option 3: No other options for the site were suggested during consultation.

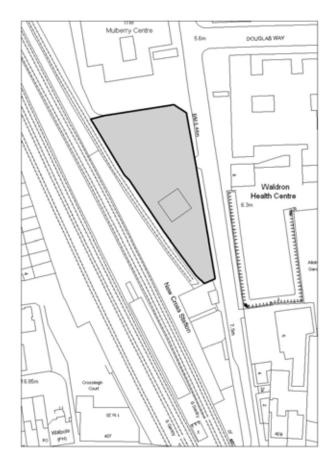
Implementation

An option to propose a new development on the site will not now be proceeded with.

Flood Risk Area

This site is within Flood Risk Zone 1 Low Probability of Flooding.

Site 2 - Site at New Cross station Amersham Vale



Source: Lewisham Unitary Development

Plan 2004 (UDP)

Site Area: 0.20 hectares

Comments:

Currently in use as open storage and owned by Network Rail.

The North Lewisham Masterplan proposes a new through route passing along the northern boundary of the site to link to a new pedestrian bridge crossing the railway at New Cross Gate Station. The footpath is proposed to be part of a network of new and improved pedestrian links that will integrate the many sites and locations in the north of the borough that are currently difficult to access due to severance caused by railway lines, and historic development

patterns.

The Options

The following options were put forward as part of the Issues and Options consultation:

Option 1: 100% Housing.

Option 2: Mixed use with commercial or community and residential uses.

Option 3: Retain current use.

Option 4: Other option suggested during consultation.

The Preferred Option

Option 1 or Option 2 Residential or Mixed Use with commercial or community and residential uses.

Reason for Preferred Options

Options 1 and 2 Both Housing or mixed use development are sustainable uses on this site, and would contribute to making New Cross Station a more visually attractive location. An element of commercial or community development, if feasible on what is a relatively small

site would add to the vitality and viability of New Cross, which would also reduce crime and the fear of crime. 100% housing development would make an increased contribution to housing provision targets.

Issues and Options Consultation

One respondent stated that they favoured 100% housing on this site.

Four respondents were in favour of mixed use commercial/ community/ residential on the site including the owners of the site Network Rail.

One respondent was in favour of retaining the current uses.

What alternatives were considered and why they were rejected

Option 3: Retain current use. The current use is not considered to represent a productive or attractive use of what is a high profile site adjacent to a railway station and has a negative effect on the image of the borough. Redevelopment of the site either in terms of Option 1 or Option 2 would enable the implementation of the pedestrian link proposed in the North Lewisham Master plan. The option to retain current uses was therefore rejected.

Option 4: No other uses were suggested during the Issues and Options consultation.

Implementation

Medium Term by Network Rail. In the short term the site will be used as a depot in support of railway operational use.

Flood Risk Area

Flood Risk Zone 1 Low Probability of Flooding.



Site 3 – New Cross Hospital Site Avonley Road

Source: Lewisham Unitary Development Plan 2004 (UDP) Site Area: 0.90 hectares **Comments:** Former NHS Hospital Site. The design of the development will need to take account of the Listed Buildings on New Cross Road.

The Options

The following options were put forward as part of the Issues and Options Consultation:

Option 1: Housing.

Option 2: Mixed Use including housing.

Option 3: Any other option suggested during consultation – suggestion for mixed use including retail.

The Preferred Option

Option 2: Mixed use (possible community use) including housing.

Reason for Preferred Option

The site is suitable for housing and will make a good contribution to meeting housing provision targets. However, although most of the hospital uses have been transferred to other facilities within Lewisham, it was considered that in the context of other largely residential developments that have occurred locally, a sustainable option would be the

inclusion of a community facility in order to support the needs of the increased residential population should a specific community use be identified.

Issues and Options Consultation

Five respondents were in favour of a mixed use development. One of these also thought that the mix should include an element of retail with the housing due to lack of local shops. Two writers favoured 100% housing. Four writers had no preference for uses on this site. Thames Water had no current concerns regarding water supply or waste water to this site.

What Alternatives were considered and why they were rejected

Option 1: 100% housing was rejected as it was thought that an element of mixed use would add vitality to a largely residential area. No other options were suggested.

Option 3: Mixed Use with an element of retail suggested by a consultation respondent was rejected as this site is adjacent to a Local Shopping Centre. A small retail use, for instance a corner shop, however might not be ruled out by the rejection of this option.

Implementation

PCT Trust Medium Term.

Flood Risk Area

Zone 3 High Probability of Flooding. High Residual Risk of Flooding.

Site 4 – Former United Dairies Site Baring Road

Source: Lewisham Council Site Area: 0.55 hectares

Comment: This is a former employment site. Proposals for a self storage facility on the site were opposed as the design and proposed use was considered to be incompatible with the adjacent residential environment.



The Options

The following options were presented as part of the Issues and Options

Consultation:

Option 1.100% housing.

Option 2. Employment (office/light industry/warehousing).

Option 3. Any other option suggested during consultation.

The Preferred Option

Option 1. 100% Housing.

Reason for Preferred Options

This is a brownfield site surrounded by residential development. It is considered that the opportunity should be taken at

this location to provide housing to meet housing provision targets, and to improve the overall urban quality of this prominent site on a main road (South Circular) passing through the borough.

Issues and Options Consultation

5 respondents replied in favour of 100% housing on the site, with one specifically mentioning the site as potentially suitable for key worker housing. One reply was in favour of green technology on the site, one was in favour of leaving the site to develop as a wildlife area. Two respondents were in favour of Mixed use employment and housing on the site. Three respondents gave no preference while one of these stating opposition to a 'Yellow Box' self storage development.

Thames Water had no current concerns regarding water supply or waste water to this site. One of these was in favour.

What Alternatives were considered and why they were rejected

Option 2 – Office /Light Industry/Warehousing. This option was rejected due to the nature and quality of the adjacent residential development. Schemes that have come forward to date have not been of sufficient quality to contribute to the urban quality of this site. This has also been true of planning applications involving mixed use B8 (self storage warehouse) and residential on this site. Permission for these schemes has been refused and this has been confirmed on appeal.

Option 3 - Alternative Option presented during consultation.

Two other options were put forward:

- Green Technology Centre. This use has the potential to provide a good urban environment in this location, and to provide interest and vitality in an otherwise bland frontage. However, in the absence of definite proposals or funding and therefore uncertainties as to whether it would be developed, this is not a preferred option.
- 2. Wildlife Area. The site is not currently of nature conservation interest and the owner of the site is strongly interested in obtaining development. It does not therefore seem realistic to implement this option.

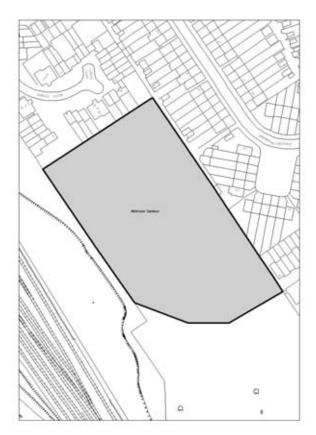
Implementation

Short Term – Private Sector Development.

Flood Risk Area

Zone 1 Low Probability of Flooding.

Site 5 - Land Between Railway Line and Baring Road with Access from Hoser Avenue



Site Area: 1.29 hectares

Source: Synergy Planning and Property
Consultants on behalf of the owners
Woodland Environmental

Comment

The owners of the site are proposing a residential development off Hoser Avenue with retention of the Green Corridor and enhancement work to the Hither Green Nature Reserve.

They state that the land is currently occupied by redundant allotments.

This site is Metropolitan Open Land and a Site of Nature Conservation Importance in the Lewisham Unitary Development Plan which states that the only development acceptable

on this land is development that would preserve the open nature of the land e.g. public or private open space, playing fields, allotments etc, and which would not be likely to destroy, damage or adversely affect the protected environment.

The Options:

The following options were presented as part of the Issues and Options Consultation:

Option 1: Retain site as Metropolitan Land and Site of Nature Conservation Importance.

Option 2: Release part of the site for housing development in exchange for enhancement to other local nature conservation features.

The Preferred Option

Option 1: Retain Site as Metropolitan Open Land and Site of Nature Conservation Importance.

Reasons for Preferred Option

Metropolitan Open Land is of Strategic Importance to the whole of London. The land is also a site of nature conservation importance. These areas have recently been re-reviewed by the Greater London Authority. In this case these designations are considered to override the need for new housing land. Development of housing on this site would also not be

considered to be development on brownfield land which would not be in accordance with PPS 3 on Housing. There is a high demand and a long waiting list for allotments within Lewisham.

Issues and Options Consultation

34 respondents were in favour of retaining Allotments and Metropolitan Open Land including the Greater London Authority who would oppose the release of Metropolitan Open Land. Various other were given including opposition to housing development, retention of allotments, nature conservation value, and access to the site.

Thames Water has no current concerns regarding waste water to this site. Detailed planning proposals are required in order to ascertain impact on water supply network.

What Alternatives were considered and why they were rejected

Option 2: The option for housing would harm Nature Conservation and Open Space interests of acknowledged importance. The offer of mitigation for this loss in terms of improvements to the Hither Green Nature Reserve would not be considered adequate to mitigate this loss. This option was therefore rejected.

Implementation

The preferred option proposes that the current land use does not change.

Flood Risk Area

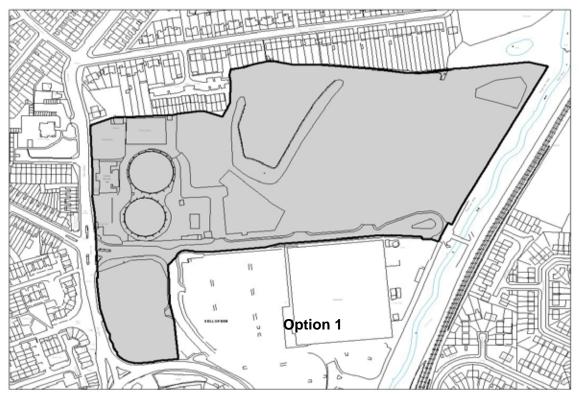
Zone 1 Low Probability of Flooding.

Site 6 - Bell Green Gasworks

Site Area: 9.86 hectares

Source: Castlemore Securities (landowners) and Lewisham Unitary Development Plan 2004

Comments. This site (see Map directly below) is currently vacant apart from the Gasholders and Livesey Hall.



The site is adjacent to the Savacentre at Bell Green (already developed as Phase 1). The Map given for Option 1 above shows the entire area that is available for redevelopment.

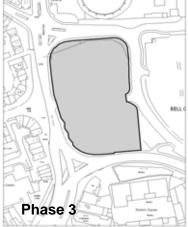
The Options:

The following options were presented as part of the consultation on Issues and Options and on various parts of the site as shown below.

Option 1. Development of the whole site Mix of B1, B2, B8 Employment and non-food bulky goods retailing. Livesey Hall to remain in community use. Green link to be provided through the site. Unsuitable for residential use due to contamination.



Option 2. Redevelopment of 'Phase 2' of the site for retail and/or employment.



Option 3: Redevelopment of Phase 3 site for retail and residential.

Option 4: Other uses suggested for all of some of these sites as part of the Issues and Options Consultation.

The Preferred Option

Option 1: Development of this whole site for a mix of uses

Reasons for Preferred Option

The preferred option will ensure a comprehensive approach to the development of the site.

Issues and Options Consultation

Thames Water stated they had concerns regarding waste water services in relation to this site assuming a large scale redevelopment of Phases 2 and 3. They stated 'Specifically the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary to undertake investigations into the impact of the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we advise that developers must be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.'

One respondent stated that Bell Green should be designated as a town centre in order to coordinate its comprehensive regeneration.

Another respondent was in favour of residential for the Phase 3 site which would not jeopardise local shops e.g. Sydenham Road.

Another respondent considered that the Gas Works site as a whole (9.96 ha.) and the existing Sainsbury's store, should be allocated as a whole for retail development, with residential and employment uses also being acceptable on parts of the site.

One respondent considered that employment uses were not appropriate for these sites.

What Alternatives were considered and why they were rejected

Options 2 and 3: Treatment of this as separate sites for retail and/or employment or retail and residential was considered to not promote comprehensive redevelopment of those parts of Bell Green that remain to be developed.

Option 4: Other uses suggested for all or some of these sites as part of the Issues and Options Consultation

An option to designate the site as a Town Centre was not thought appropriate as the site when developed would not meet the criteria for designation at the appropriate level of the Town Centre hierarchy in terms of variety of function required.

The Council is not promoting redevelopment of the Sainsbury's store at Bell Green. This development is complete and the Council wishes to promote development on the remaining phases that remain undeveloped.

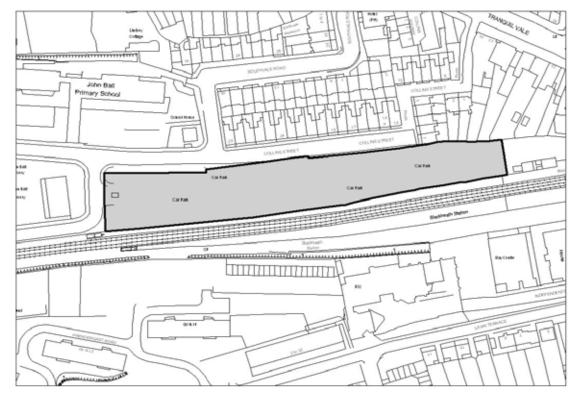
Implementation

Private Sector Medium/Long Term.

Flood Risk Area

Zone 1 Low Probability of Flooding. Although part of the site is adjacent to the River Pool which is found within a Zone 3 High Probability of Flooding.

Site 7 - Blackheath Station Car Park



Source: Proposal from Network Rail

Site Area: 0.47 hectares

Comment Network Rail propose a high density housing scheme on the station car park in association with 'decked car parking'. They state that the current car park at this location 'underutilises this brownfield and sequentially preferable site.' The replacement of the car parking by decked car parking would represent 'an exceptional cost to the scheme which would likely impact on the level of affordable housing that could be achievable if grants were unavailable'. '

The site is in a highly sensitive location in one of the Borough's finest Conservation Areas, which was one of the country's first ever Conservation Areas. Development on this site would need to preserve or enhance the character or appearance of the Conservation Area. The Blackheath Character Appraisal (adopted March 2007) says that this open space provides a breathing space in the conservation area. PPG 15 and English Heritage's guidance an appraising character emphasised that spaces as well as buildings are important to an area's special distinctiveness. This space has always remained undeveloped. When the railway opened in 1849 the land was used as a goods yard, and today is used for a weekly, well attended farmer's market as well as a car park.

The Options:

The following options were presented during the Issues and Options Consultation:

Option 1: Housing in association with decked car parking.

Option 2: Retain current use – Car park and use for a Farmers Market.

Option 3: Mixed use development.

Option 4: Other use suggested by the Issues and Options Consultation.

The Preferred Option

Option 2. Retain current use – Car park and weekly use as a Farmers Market.

Reason for Preferred Option

The Preferred Option preserves the current character of Blackheath Village. It also provides a vital role by providing parking for the various functions of Blackheath Village and thereby supporting its retail and commercial functions and also a space for a local farmers market which is an important local attraction. In this location these functions are considered to outweigh the contribution that a high density housing or mixed use and housing development would make to Housing provision targets, and also any contribution additional retail space would make to the village economy.

Issues and Options Consultation

The majority of consultation responses were in favour of retaining the car park and farmers market. 8 individual responses were received in favour of this option including the Blackheath Society and the Blackheath Village Traders Association, and also a petition containing 174 signatures. One respondent was in favour of development for housing with decked car parking. Network Rail replied in favour of Option 3 Mixed Use development as part of the Issues and Options consultation stating that: "Network Rail originally proposed that this site was suitable for a high density housing scheme with decked car parking. However, the Office of Rail Regulation may clear the site for alternative uses within the LDF planning period. It would be reasonable to provide for housing-led mixed use development, with ground floor retail and a rationalised parking area for station users. This would be the most appropriate way of making more efficient use of the site. There are no reasons why the development of the site could not be achieved sensitively and with due regard to the character of the conservation area."

Alternatives that were considered and why they were rejected

Option 1: Housing in Association with decked car parking

Although this site is close to a rail station and therefore in a highly sustainable location it was considered that in this case the preservation or enhancement of the Conservation Area at

Blackheath took precedence. It was considered that a development of this density and pattern would not conform to the historic pattern of development within the area and would form an intrusive element that would not preserve or enhance its character. The loss of the car park additionally would not preserve the village character of Blackheath Conservation Area by removing the Farmer's market site, and the possibility of parking in the centre of the village.

Option 3: - Mixed Use Development

This option was rejected for similar reasons to the above. Although a development of this type would contribute to the commercial centre of gravity of Blackheath it was considered it would not preserve or enhance the character of the Conservation Area.

Option 4: Other use Suggested in the Consultation

No other uses were suggested in the consultation process.

Implementation

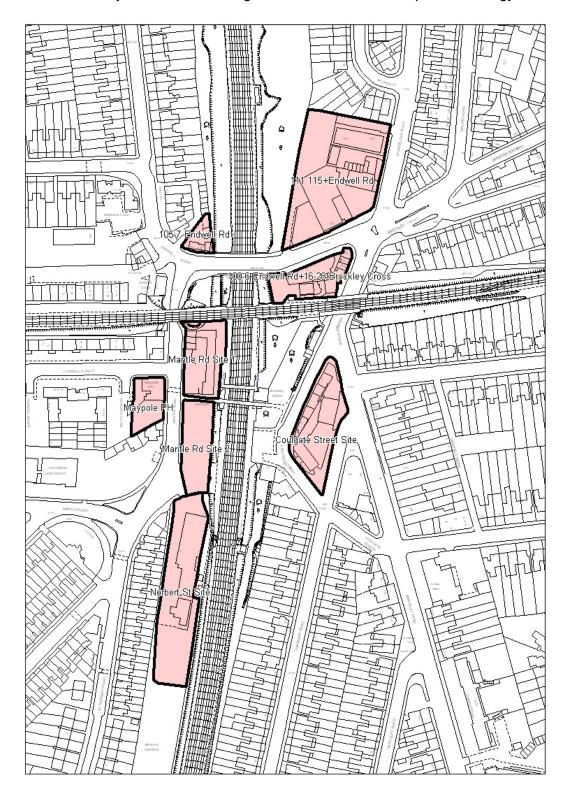
The Preferred Option seeks to retain the current uses on this site, therefore no implementation timetable is necessary.

Flood Risk Area

This site is in Zone 1 Low Probability of Flooding.

Site 8 – Sites at Brockley Station, Coulgate Street, Mantle Road, St Norberts Road, Brockley Cross and Endwell Road

Source: Brockley Cross Urban Design Framework and Development Strategy.



The Council is promoting a number of sites whose development can contribute to the regeneration of Brockley Cross by:

Promoting local identity

- Creating a heart to the community
- Boosting the local economy
- Improving accessibility
- Improving the quality of the public realm

There will be a priority for pedestrian movement in safer and attractive streets.

COULGATE STREET SITE (Site Area 0.19 hectares)

This site is within a Conservation Area so development would need to preserve or enhance the character of the area.

The Options

Option 1: The Council is proposing the redevelopment of the MOT garage and car lot together with the upgrading of Brockley Station to effectively provide a gateway to Brockley Cross. A 'Landmark' building is proposed adjacent to the Brockley Barge pub comprising retail/commercial space on the ground floor with residential above. Retail and commercial space on the ground floor with residential on the upper floors is proposed for the MOT garage and car lot. The row of early 19th century cottages on Coulgate Street would be retained. A planning obligation would improve the streetscape and the pedestrian environment on Coulgate street and improve access to the shops on Brockley Road and to the transport interchange. A contribution towards a public garden and wildlife area would be sought.

Option 2: 100% housing.

Option 3: Employment uses (office, industrial or warehousing).

Option 4: Community uses.

Option 5: Keep existing uses.

Option 6: Other uses suggested as part of the Issues and Options Consultation – Option 1 has been amended as various parts of the site have now been implemented. This option now focuses on the part of the site to the east of Coulgate Street as the uses on the west side and the boundary of the site have been amended accordingly. This is because 'Brockley Common' open space and a small residential development have been implemented. The option now comprises the island site on Coulgate Street and the option proposes to retain the existing cottages on Coulgate Street and redevelop the rest of the site for a mixture of housing, employment uses (office or light industrial), and community uses.

The Preferred Option

Option 6: New option with amended boundary with mixed use development and retention of existing Coulgate Street cottages.

Reasons for Preferred Option

This option is similar to other presented options but reflects the fact that the uses on part of the site (including proposed open space) have now been implemented. The proposal accords with the Council's aims for Brockley Cross.

Issues and Options Consultation

One respondent was in favour of the uses in the Supplementary Planning Guidance. One respondent was in favour of community uses on this site. The Greater London Authority supported the retention of any open space on the site.

What alternatives were considered and why they were rejected

Option 1: This mixed use option was not chosen as part of the site it covered and referred to specifically has been developed.

Option 2: A mixed use development on this prominent town centre location adjacent to the railway station was thought to meet the various aims of the Council's aims better than a development of 100% housing. This option was therefore rejected.

Option 3: If this option were to be taken forward involving use of all the site for employment/office uses of whatever nature appropriate to this location it would have the undesirable effect of losing the early 19th century cottages on Coulgate Street. This option was therefore rejected in favour of a mixed use option and retention of the cottages.

Option 4: It was not thought realistic to develop the entire site for community uses, it is likely that such a development of a single use would not succeed and would not make good use of this prominent site.

Option 5: Retention of current uses. Retention of all the current uses on the site was not thought to be desirable on this high profile site. The MOT garage and car lot does not present a good image to visitors arriving at Brockley. The site would benefit from a more intensive high quality mixed use development.

MANTLE ROAD SITES

These sites are within a Site of Nature Conservation importance of Metropolitan Importance (Forest Hill to New Cross Gate Railway Cutting).

Site 1 Furniture Workshop (Site Area: 0.13 hectares)

This site comprises a furniture workshop currently in employment use. The draft framework proposes a four storey residential block with a ground floor suitable for live work or commercial uses.

Site 2 Scaffolding Yard (Site Area: 0.12 hectares)

This site is a scaffolding yard.

The draft framework states that 'These walled sites create blank facades for much of Mantle Road and the footbridge to Brockley Station does not benefit from natural surveillance, although a CCTV camera has been installed.'

The Council also considers that as this area is predominantly residential, new development should strengthen this character, and its design should promote natural surveillance and bring the street scene back to life.

Options put forward in the Issues and Options paper for Sites 1 and 2 were as follows:

Option 1: A residential block with the ground floor suitable for live work or commercial uses.

Option 2: 100% housing.

Option 3: Employment uses (office, industrial or warehousing).

Option 4: Community uses.

Option 5: Retain current uses.

Option 6: Other option suggested as part of the public consultation.

Option 7: Reduce size of site of nature conservation importance to accommodate a bigger building footprint, with mitigation and enhancement measures.

The Preferred Option

The preferred option is Option 1 for both sites - a residential block with the ground floor suitable for commercial use. The preferred option however leaves the number of storeys unspecified and prefers commercial use rather than live/work use on the ground floor.

Reasons for Preferred Option

The preferred option meets the Council's aims for Brockley Cross. Commercial uses on the ground floor are preferred due to some practical problems that have been identified in terms of live work units in ensuring their continued business use which is vital to the success of the draft strategy. The development also allows for the upgrading of access to Brockley Station from the west, by providing a level access to the Station and access to 'Brockley Common'.

Issues and Options Consultation

Two replies were received in respect of Site 1 Mantle Road, one of the replies was in favour of community use, and the other was in favour Mixed Use Housing and Live-work units. Two replies were received in respect of Site 2 Mantle Road both of which were in favour of Mixed use housing and live work units.

What alternatives were considered and why they were rejected

Option 2: Housing. This option was rejected as although it would make a higher contribution to housing targets, the aims of enlivening the street scene at this location, and creating a local place with its own identity close to the entrance of Brockley Station was considered more important at this location.

Option 3: Employment Uses: This option was rejected because although it would contribute to the local economy, one of the main aims of the strategy is to ensure that the streets are safe and attractive by providing a variety of uses which will ensure day long natural surveillance. A mix of uses is considered more likely to achieve this aim, and to be more suitable to the residential nature of the location close to Brockley Station.

Option 4: Community Uses. It was thought unrealistic to provide 100% community uses on both of these sites. However an element of these uses would contribute to the aims of the draft Strategy and the chosen option would not preclude inclusion of an element of these uses.

Option 5: Retain current uses. The current uses and buildings provide walled facades for much of Mantle Road and do not improve the character of the area. The aim of the strategy is outlined above. Dependent on the nature of the furniture business it might be possible to relocate this in a mixed us development.

Option 6: Other Suggested Uses. Suggestions for other uses were not received during the Issues and Options consultation.

Option 7: Reduce size of Site of Nature Conservation Importance to accommodate new development. This option was rejected. Any redevelopment would need to comply with policies relating to retention of the important nature conservation features of the site, and provide mitigation measures.

LIGHT INDUSTRIAL UNITS REAR OF ST NORBERT ROAD (Site Area: 0.29 hectares)

These are light industrial units to the rear of the houses on St Norbert Road. Any development would need to take the opportunity to improve the pavement on Mantle Road and mark the western entrance to Brockley Station, improve facilities for travellers and possibly provide a retail facility. The units are underused. An opportunity could be taken to improve the environment to the rear of the houses on St Norbert Road and to introduce other uses.

Options presented in the Issues and Options consultation were:

Option 1: 100% housing in the form of a new residential terrace could be created alongside the railway line to create a two storey mews style development to replace the existing industrial units (Brockley Cross Urban Design Framework).

Option 2: Retain current employment uses (office, industrial or warehousing).

Option 3: Community use.

Option 4: Other Options as suggested in the Issues and Options consultation.

The Preferred Option

A combination of Option 1 and 2: Residential development and a mix of commercial uses to replace or increased employment generating uses. This site is not within the site of Nature Conservation Importance. However the development should allow improved access to the allotments that are within the Site of Nature Conservation Importance to the south.

Reasons for Preferred Option

The preferred option meets the aims of the draft strategy. The site presents an opportunity to increase the commercial viability of the site which is close to public transport and to provide a contribution to housing provision targets.

Issues and Options Consultation

There were no specific responses in relation to this site.

What alternatives were considered and why they were rejected

Option 3: Community Use. This option was rejected as the site is too large to be given over entirely to this use. A mixed use option described above would not preclude an element of community use within the development.

Option 4: Other suggestions for using the site were not received during the Issues and Options consultation.

*NB Two other small sites at the Maypole Public House (Site Area 0.07 hectares) on Mantle Road and at 105-105 Endwell Road (Site Area 0.03 hectares) proposed for mixed use commercial and residential development are shown on the map to present a complete picture of developments occurring in the area.

111 & 115 ENDWELL ROAD (TIMBER YARD AND COMMUNITY COLLEGE)

Site Area: 0.36 hectares

Options put forward during Issues and Options Consultation

Option 1. Amalgamation of these two properties to provide approximately 60 two bed flats

on upper floors, live/work units and other employment/ community uses on the ground floor

with 50% residential parking provision.

Option 2: 100% Housing.

Option 3: Retain current uses on site.

Option 4: Other use suggested as part of the issues and options consultation.

The Preferred Option

Option 1: Mixed Use development. Housing and ground floor employment/community uses.

The site boundary has been amended to include the Place of Worship and the access way

from the Shardeloes Road frontage to enable a developable site. The Church itself is not

proposed for redevelopment as it is considered to be a valuable community facility. If this

was the case then the church building would need to be re-provided on site.

Reasons for Preferred Option

This site is close to a railway station and good transport facilities and has the potential to

enhance the function of the Brockley shopping centre. The site is also in a prominent

location at a highly trafficked road junction and currently does not make a positive

contribution to the urban environment. This area presents difficulties for the pedestrian – the

street environment is bleak and it is difficult to cross the road to the rest of the Brockley

Cross area. The mixed use scheme described would contribute to the vitality and vibrancy of

this location, make a contribution to housing provision and to the vitality and viability of the

local economy and contribute positively to the urban (and pedestrian) environment as a

whole.

Issues and Options Consultation

One response was received in favour of Option 1, and one response was in favour of

housing and community uses on the site.

Alternative Uses that were considered and why they were rejected

Option 2: 100% housing development would make a greater contribution to housing figures.

However at this location the contribution a mix of uses would make to the urban environment

is considered to outweigh the contribution that 100% housing would make to meeting housing targets.

Option 3: Retain current uses. These employment uses in a prominent location provide a poor urban environment at this location. Although providing jobs, and making a contribution to the local economy it is considered that a new mixed use development replacing some or all of the jobs on site would make a better contribution to sustainability and the urban environment.

Option 4: No other suggestions were made for these sites during consultation.

100 - 106 ENDWELL ROAD (BRIDGE HOUSE) AND 16-28 BROCKLEY CROSS

Source: Draft Brockley Cross Urban Design Framework and Development Strategy.

Site Area: 0.11 hectares

Bridge House already has planning permission for ground floor commercial development with residential above.

The Options

The following Options were presented as part of the Issues and Options consultation:-

Option 1: The draft framework proposes the amalgamation of these properties and potentially the rest of the island site bounded by Brockley Cross, Endwell Road and the two railway lines to provide a comprehensive mixed use scheme. Uses proposed include a corner retail/commercial units as part of a landmark building on this corner with residential development above.

Option 2: As above but with high quality ground floor live/work units.

Option 3: 100% Housing.

Option 4: Retain current uses.

Option 5: Other use suggested as part of the Issues and Options consultation.

The Preferred Option

Option 1: Mixed use development

Reasons for Preferred Option

The chosen option meets the Council's aims for Brockley Cross by improving vitality and viability and the urban quality of this important location.

Issues and Options Consultation

One response was received in favour of Option 1.

Alternatives that were considered and why they were rejected

Option 2 Mixed use with live/work on the ground floor. This option was rejected as it was considered that commercial development at this high profile site would make a better contribution to the local economy, to improving the streetscape, and creating a sense of place.

Option 3: 100% Housing. Although this option would make an increased contribution to housing provision targets it was considered that the aims of the Strategy would be better met by promoting commercial uses on the ground floor at this location.

Option 4: Retain current uses. The proposed mixed use option will replace the employment and commercial uses on site and add some residential development. The current uses are not considered to make a strong contribution to the urban environment or to the local economy, and so this option was rejected.

Option 5: Other use suggested as part of Issues and Options Consultation. No other options were suggested.

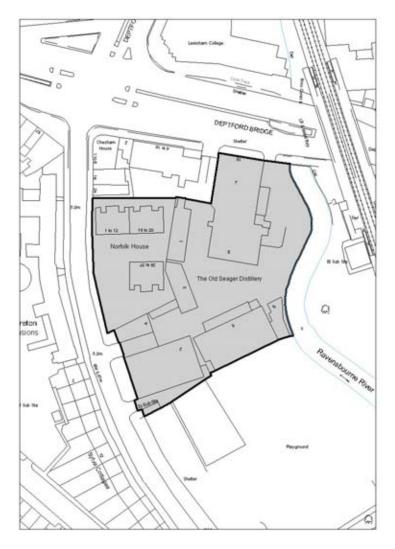
Implementation

Private Sector - short to medium term.

Flood Risk Area for All Sites at Brockley Cross

All these sites fall within Zone 1 Low Flood Risk Probability.

Site 9 - Seager Buildings, Brookmill Road



Source: Lewisham Unitary
Development Plan 2004 (UDP),
and Hepher Dixon on behalf of
Clients MacDonald Egan (site
owners). The site already has
planning consent for a mixed
use/residential development with
tower.

Site Area: 0.7 hectares

The Options

The following Options were presented as part of the Issues and Options Consultation: -

Option 1: Mixed use development of B1 employment (offices), shop, gallery, live/work units, housing.

Option 2: 100% housing.
Option 3: Community use.

Option 4: 100% employment

(offices/ industrial/warehouse).

Option 5: Other option suggested during the Issues and Options consultation.

The Preferred Option

Option 1: Mixed Use Development.

Reasons for Preferred Option

The buildings on this site in a high profile location adjacent to a station on the Docklands Light Railway, and fronting on to the A2 major thorough route in the borough were considered to be under used, and represented a low density use of the site. The proposed development would take full advantage of this sustainable location, provide new employment and make a contribution to meeting housing provision targets, as well as contributing to the regeneration of Deptford.

Issues and Options Consultation

No consultation responses were received in respect of this site allocation.

What Alternatives were considered and why they were rejected

Option 2 100% Housing was rejected. Although the site is in sustainable location and highly suitable for housing development, it was considered that the opportunity that is presented by the site to increase the variety of uses and therefore the vitality and viability of Deptford outweighs the need to provide 100% housing on the site.

Option 3: Community Use

This option was rejected as it would not provide a viable development for the whole site. It would be possible to include an element of community use as part of the mix in Option 1.

Option 4: 100% employment (offices/industrial/warehouse)

This would either retain the current buildings or replace them with new office/business/industrial development. The current buildings are low quality and would require a high level of investment to return them to a state suitable for modern commercial use. It is also considered that replacement of these buildings with a development that comprised 100% employment space, with no element of subsidy from residential development would not be economically viable although it would contribute to the economy of Deptford if it were possible. This option was therefore rejected.

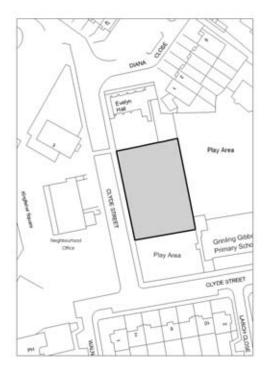
Option 5: Other Option suggested during the Issues and Options Consultation No other options were presented.

Implementation

Private Sector (Galliard Homes) Short Term.

Flood Risk Area

The site falls with Zone 3 High Probability of Flooding with a Medium Residual Risk of Flooding.



Site 10 - Clyde Street SE8

Source: Positive Mental Attitude, 146 Deptford High

Street SE8

Site Area: 0.10 hectares

Suggestions that this site should be reused as a community facility were made by a local community group as it appeared to be locked and unused.

The Options

Options presented during Issues and Options Consultation were:-

Option 1: A purpose built Community facility to be run by an existing community organisation with a

history on the Evelyn Estate to the benefit of children, parents and other ethnic groups.

Option 2: Suggestions for different use or retention of current use.

The Preferred Option

Option 2: Retention of current use (Environmental Study area and Wildlife Garden).

Reasons for Preferred Option:

The schools premises officer advised that the site is not in fact un-used but forms part of the educational facilities for the school. The site is used by the school as an environmental study area and wildlife garden.

Issues and Options Consultation

No Consultation responses were received in respect of this site.

Alternatives that were considered and why they were rejected

The site is used by the school as an educational resource and is therefore not available as a site for development as a built community facility.

Implementation

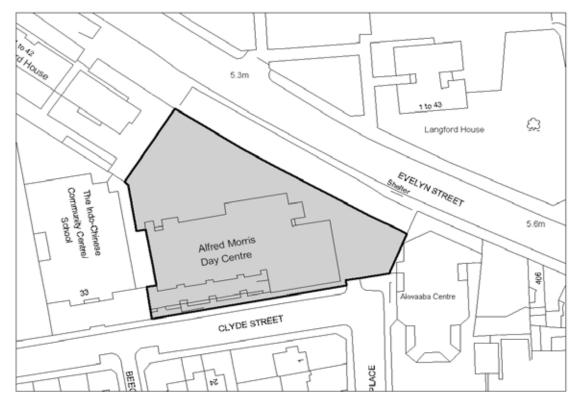
The Council's preferred option is to retain the current use. An implementation schedule is therefore not required.

Flood Risk Area

Zone 1 Low Probability of Flooding.

Site: 11 - Former Alfred Morris Day Centre, Clyde Street SE8

Source: Lewisham Council



Site Area: 0.26 hectares

The Alfred Morris Day Centre was recently demolished.

The Options

The following Options were put forward as part of the Issues and Options consultation:

Option 1: Mixed Commercial and residential.

Option 2: 100% Housing.

Option 3: Housing and Community Use.

Option 4: Other suggested use during consultation.

The Preferred Option

Option 2: 100% Housing.

Reasons for Preferred Option

This option was chosen as the site is an appropriate location for housing and will make a contribution to housing provision targets.

Issues and Options Consultation

No specific consultation responses were received in respect of this site.

What alternatives were considered and why they were rejected

Option 1: A mix of commercial and residential was not thought appropriate, or likely to be successful in this location as the frontage on Evelyn Street and Clyde Street is not in a commercial location.

Option 3: The former community uses on this site have been replaced elsewhere in the borough in line with Council policy.

Option 4: No suggestions for other uses of the site were made during the Issues and Options Consultation.

Implementation

Short Term Private Developer.

Flood Risk Area

Zone 3 High Probability of Flooding with Medium Residual Risk of Flooding.

Site 12 - Comet Street, SE8

Source: Deptford Urban Design & Development Framework Supplementary Planning

Guidance 2004

Site Area: 0.76 hectares



The Deptford Urban Design and Development Framework promotes a general improvement in the quality of the public space, built form and activity on this site, including a reinforcement and enhancement of the pedestrian links from New Cross Station to the High Street, creation of a new built environment that will enhance the street scene by the creation of street frontages with greater activity and natural surveillance, and a new building on the junction of Watson Street and New Cross Road. The form of any new building should aim to minimise unregulated parking.

The Options

The following options were presented as part of the consultation on the Issues and Options Paper:

Option 1: Promotion of creative/cultural industries in Theatre Place, and the promotion of live/work accommodation in this area.

Option 2: 100% housing.

Option 3: Mix of housing and commercial uses.

Option 4: Other use suggested as part of the Issues and Options Consultation.

The Preferred Option

Option 3: Mix of housing and Commercial uses.

Reasons for Preferred Option

A number of developments are being approved for mixed use commercial and residential uses. These developments will meet the aims of the Supplementary Planning Guidance.

Issues and Options Consultation

One respondent replied specifically in relation to this site in favour of creative and cultural industries on this site.

What alternatives were considered and why they were rejected

Option 1: Creative uses at Theatre Place and promotion of live/work accommodation.

Commercial development as brought forward by current development proposals considered to equally meet the aims of The Supplementary Planning Guidance.

Option 2: 100% Housing. A 100% Housing development at this location close to Deptford Town Centre although making a better contribution to housing provision targets was considered to not meet the aims of the Supplementary Planning Guidance.

Option 4: Other use or mix of uses

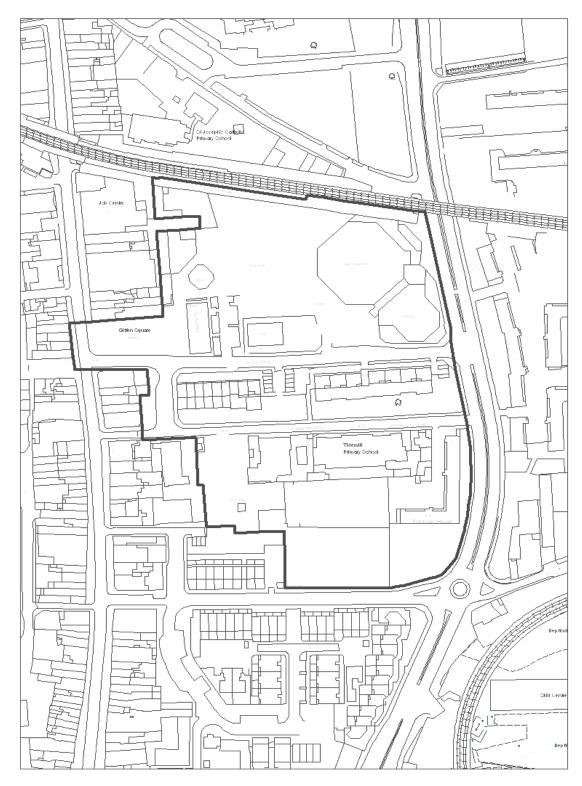
No other options were suggested as part of the Issues and Options consultation.

Implementation

Private Developers Short to Medium Term.

Flood Risk Area

Zone 3 High Probability of Flood Medium Residual Risk of Flooding.



Site 13 - Giffin Street, SE8

Source: Deptford Urban Design & Development Framework Supplementary Planning Guidance 2004

Site Area: 4.01 hectares

The Deptford Urban Design and Development Framework promotes a general redevelopment of this site to enhance community facilities, townscape and the public realm.

It should be noted that although the boundaries of this site include a number of housing developments, it is not intended that they will be directly affected by any development arising from the adoption of this option. The housing has been included as part of a wider area in order to ensure that all proposals put forward on the site are considered in a co-ordinated and comprehensive manner taking account of elements of the environment that will remain in place.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: A package of options for the area from the Deptford Urban Design Framework including:

- The redevelopment of Council offices as a 'one stop shop' office integrated with Giffin Square
- Small scale leisure development at the northern edge of Giffin Square
- Possible redevelopment of Wavelengths swimming pool and library in the long term
- Use of the railway arches at Resolution Way for market storage

Option 2: 100% Housing.

Option 3: Mixed Use Housing and Commercial development.

Option 4: Other use suggested during the Issues and Options consultation.

The Preferred Option

A mix of Options 1 and 3: Package of options for enhancing the public facilities in the area to enhance the overall commercial and leisure functioning of Deptford High Street including the market together with housing development. Tidemill School possibly be recited to the north of the site. The railway arches on the southern side of Resolution Way will be used for commercial units as market traders storage has been allocated at Hamilton Street (Site 14).

Reasons for the Preferred Option

The development will enhance Deptford as a functioning commercial and leisure destination for local people, and provide a contribution to meeting housing targets.

Issues and Options Consultation

One response was received specific to this site in favour of Leisure Parking and Housing uses.

What alternatives were considered and why they were rejected

Option 2: 100% Housing. This option was rejected as this single use would not contribute to overall Town Centre functioning. The site already has a proportion of housing. In this case the need to ensure the continued vitality and viability of Deptford Town Centre is considered to outweigh the need to meet housing provision targets.

Option 4: Other Use suggested as part of the Issues and Options Consultation No other option was suggested.

Implementation

London Borough of Lewisham and Private Sector partners. Short to medium Term. Works have commenced on a pool extension at Wavelengths swimming pool.

Flood Risk Area

Zone 3 High probability of flooding with high/medium residual risk of flooding.

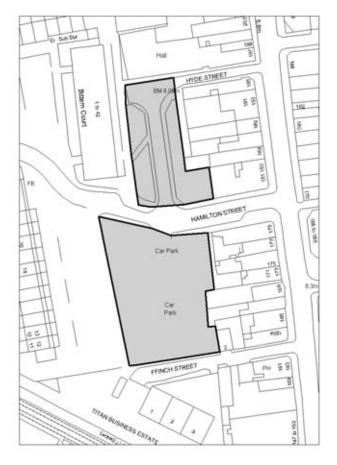
Site 14 - Hamilton Street, Deptford SE8

Source: Lewisham Council

Total Site Area 0.29 hectares

This Site lies to the west of Deptford High Street and is in two parts. The southern site is currently a disused car park owned by London Borough of Lewisham. The northern part of the site consists of a small piece of road and small plots of land either side of it.

There is a designated Conservation Area adjacent to the site so any development would need to respect the character and appearance of the Conservation Area.



The Options

The following options were presented during the Issues and Options consultation:

Option 1: Housing.

Option 2: Mixed Use commercial and residential or live/work development.

Option 3: Other use proposed during the issues and options consultation.

The Preferred Option

Option 3 Other proposed use.

Reasons for Preferred Option

The balance of uses arising from the regeneration of sites in Deptford High Street means that there is now a demand

for market traders car parking which can be accommodated by reusing the car park on the southern site. This will provide for the continued regeneration of Deptford Town Centre by preserving the operational function of the important street market.

Issues and Options Consultation

One response was received that was in favour of housing and open space uses on this site.

What alternatives were considered and why they were rejected

No other options were brought forward during the Issues and Options consultation.

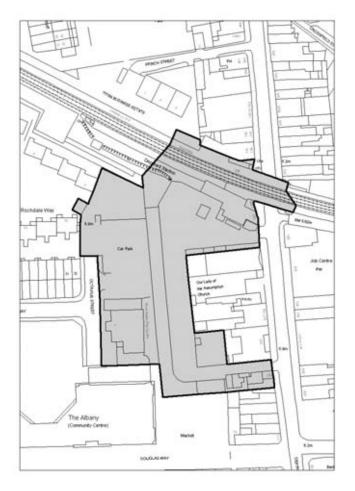
Implementation

London Borough of Lewisham Short to medium term – Site fenced and used for market traders parking.

Flood Risk Area

Zone 3 High Probability of Flooding with Medium Residual Risk of Flooding.

Site 15 - Octavius Street and Deptford Station, Deptford High Street



Source: Deptford Urban Design &
Development Framework Supplementary
Planning Guidance 2004

Site Area: 0.87 hectares

The key objectives of the schemes that have been submitted to the Council are to regenerate the area around Deptford Station, create a sense of place and civic pride, and a high quality well designed and sustainable environment.

It is proposed to provide a new station building, refurbish the Listed Carriage ramp, provide a new pedestrian and cycle route, and convert and refurbish the arches to provide retail space, workshops for creative industries and café/restaurant uses. A mixed use building is proposed on the site of the existing car parks in Octavius Street and the Rose Apple Day

Centre comprising 101 residential units and 14 live/work units.

Some of the site is in the Deptford High Street Conservation Area where development should preserve or enhance the character of the area. Some of the site is adjacent to the area where development should not harm the character of the area.

The Options:

The following options were presented during the Issues and Options consultation:

Option 1: Mixed use commercial and housing development with improvements to Deptford Station and the Listed Carriage Ramp' site allocation.

Option 2: Other options suggested as part of the Issues and Options Consultation.

The Preferred Option

Option 1: Mixed use commercial and housing development with improvements to Deptford Station and the Listed Carriage ramp.

Reasons for Preferred Option

The option will lead to the improvement of the important area around Deptford Station, improving access, the vitality of street scene and the local economy, will enhance the conservation area.

Issues and Options Consultation

One respondent replied in favour of mixed use and improvements to Deptford Station. 107 people replied about the loss of the Rose Apple Day Centre on the site and were in favour of it being rebuilt on site.

What options were considered and why they were rejected

Option 2: Other options suggested during consultation. 107 people suggested that the Rose Apple Day Centre should be re-provided on site. This suggestion was not carried forward as the services and facilities provided by the centre will be provided by other facilities in the area.

Implementation

London Borough of Lewisham Private Sector Partners Network Rail - Short Term.

Flood risk Area

This site is in Zone 3 High Probability of Flooding with Medium Residual Risk of Flooding.

Site 16 - De Frene Road Allotments SE26

Source: Proposal put forward by De Frene Allotment Club (Site Owners)

Site Area: 0.42 hectares



This site is currently in use as allotments and is protected as Urban Green Space in the Lewisham Unitary Development Plan.

The De Frene Allotment Club propose that the site should be redeveloped as affordable housing.

Policies in the Lewisham Unitary

Development Plan states that Urban Green space provides a valuable open space function, for example as a visual amenity affording a much needed break in the urban fabric; or simply by remaining open many residents and others value its presence.

The site is surrounded by residential development.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: Redevelop for Affordable Housing

Option 2: Retain current open space (allotments)

The Preferred Option

Option 2: Retain allotments (Urban Green Space)

Reasons for Preferred Option

It is considered that this site performs a valuable open space function in this area. There is also a waiting list for allotments within Lewisham. (see Allotment waiting list in the evidence base).

Issues and Options Consultation

88 consultation responses were received. 5 respondents were in favour of housing development on the site. 83 responses were in favour of retaining the allotments and open space use on the site.

What alternatives were considered and why they were rejected

Option 1: Redevelopment for Affordable Housing would remove a valuable local open space, and would be classified as development on a Greenfield site. Development targets aim to ensure that development takes place on brownfield sites. Although it would contribute to housing provision targets it is considered that the valuable open space provision in this instance is more important, with the potential for the site to be reused as allotments and reduce local waiting lists.

Implementation

The Council is choosing a Preferred Option that does not involve change or development. Therefore an implementation timetable is not relevant.

Flood Risk Area

Zone 1 Flood Risk Low probability of flooding.

Site 17- Sites at Forest Hill

Source: Lewisham Unitary Development Plan 2004 (UDP) and Forest Hill Urban Design Framework & Development Strategy Supplementary Planning Guidance 2003.

Proposals Sites in the Lewisham Unitary Development Plan were carried forward into the Supplementary Planning Guidance and considered in a wider context with the aim of delivering an improvement in the overall urban quality of the town centre.

Forest Hill Sites 17.1 and 17.2 (see maps below)



Sites 17.1 (0.57 ha.) and 17.2 (0.72 ha.) are described in the Guidance as 'Forest Hill Station and adjacent low rise development including the current WHSmiths store and sites to the east of the railway line on Perry Vale.' Site 17.2 includes the 'Finches Site on Perry Vale' which is a proposals site in the Lewisham Unitary Development Plan 2004.

These sites have a poor visual quality which do little to enhance the centre of Forest Hill and its Conservation Area. Site 17.2 has very poor connections with the rest of Forest Hill Centre The part of the site to the east of Perry Vale (Finches) now has planning permission for a mixed use development of ground for retail uses and residential development above.

The Options

The following Options were presented as part of the Issues and Options Consultation:

Option 1: An intensive mixed use development is proposed with improvements to the passenger transport interchange facility which could involve rebuilding the station, improvements to pedestrian facilities (including the path running from Clyde Terrace to the Station), comprehensive redevelopment of land on Perry Vale with commercial development (office or shops) on the ground floor with two or three floors of residential accommodation above.

Option 2: 100% Housing.

Option 3: Other use suggested during the Issues and Options Consultation.

The Preferred Option:

Option 1: Mixed Use Development with improvements as identified above.

Reasons for the Preferred Option

Option 1 will provide the visual and physical improvement, and vitality to the town centre that will be of overall benefit.

Issues and Options Consultation

Four replies were received in favour of the uses proposed in Option 1.

Alternatives that were considered and why they were rejected

Option 2: 100% Housing. This option was rejected. Although this site is within a sustainable location and would provide a good housing environment and make a good contribution to housing provision targets it was considered that this would fail to take advantage of the town centre location to increase the vitality and viability of the District Centre and increase its offer to local businesses and residents.

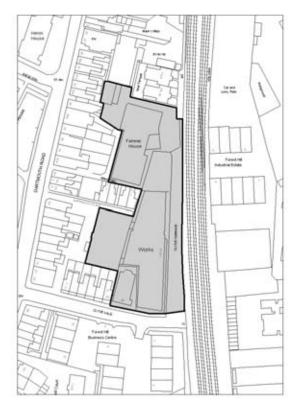
Forest Hill Site 17.3 (0.63 ha.)

This site is from the Lewisham Unitary Development Plan 2004 and forms part of Proposals Site No. 7 proposed for a mix of B1 employment, live/work units, and public footpath improvements. The southern part of the site not including Fairway House, now has a planning permission for a Mixed use development of live/work, B1 office and residential use with a S106 contribution to the footpath leading from Clyde Vale to the railway station which is being implemented.

The Options

The following Options were presented as part of the Issues and Options consultation:

Option 1: Development should provide quality landscaping alongside the railway pedestrian route. New development should face on to the pedestrian routes to



provide activity and surveillance – live work units with residential above might be suitable. New development should provide frontage onto the routes between the railway pedestrian route and Dartmouth Road in order to encourage use of the permeability the new development offers. Parking should adequately serve any new buildings. The slope of the land towards the railway line provides an opportunity for maximising development potential with higher buildings adjacent to the railway line.

Option 2: 100% Housing

Option 3: Other use or combination of uses arising from consultation.

Forest Hill Site 17.3

The Preferred Option

Option 1: As described above

Reasons for Preferred Option

A mixed use development with office use, live/work development and residential development is considered to be suitable for a District Centre location. It will add to the mix of uses, make the centre a more vital and viable proposition, and contribute to housing provision. Forest Hill also has a nucleus of creative businesses at Havelock Walk which has proved successful. This type of development will add to this creative cluster.

Issues and Option Consultation

One response was received specifically in relation to this site, that parking should be added to the mix proposed in Option 1. Four other general responses were received in favour of the uses proposed in Option 1.

What alternatives were considered and why they were rejected

Option 2 Housing: This is a town centre site. Although a sustainable brownfield site for housing development, it was considered that this would not make a sufficient contribution to the regeneration, vitality and viability of Forest Hill Town Centre.

Option 3 Other uses or combination of uses arising from consultation on Issues and Options. No other suggestions for uses were made.

Implementation for Forest Hill Sites

Private Sector, Housing Associations. Short to Medium Term.

Flood Risk Area

These sites are in Zone 1 Low Probability of Flooding.

Site 18 - Forest Hill Library, Pools and adjacent open space

Source: Forest Hill Urban Design Framework & Development Strategy Supplementary Planning Guidance 2003.

Site Area: 0.59 hectares



Forest Hill Library is a Grade II Listed Building which means that any alterations or development nearby is carefully controlled in order to preserve its special architectural character. English Heritage has been consulted as to whether Forest Hill Pools were worthy of listing. Their view is that the pools are insufficiently important in comparison to other pools in London. Forest Hill Pools is a Victorian building which does not meet modern standards. Consultation has recently taken place on whether to refurbish or replace it. An 'intrusive survey' as now been completed which has concluded that the building has retained its structural integrity, that the defects can be rectified and that refurbishing the pools is a viable

option.

The Options

Option 1: Continue current use for community use and open space.

Option 2: Retain or Refurbish Pools on site.

Option 3: Other use suggested as part of the Issues and Options consultation.

Preferred Option

Option 1: Continue current use for community use and open space. (The library is a listed building and there are therefore no proposals to redevelop this building).

Reasons for Preferred Option

This is an important local concentration of community facilities.

Issues and Options Consultation

Five responses were received in favour preserving the swimming pools on site and also in favour of refurbishment of the original pools building. One response was in favour of replacing the swimming pool due to a need for more sporting facilities. Other suggestions were that the area of open space would be more effectively provided to the front of the buildings, and that a community use should be found for Louise House.

Alternatives that were considered and why they were rejected
Under Option 2, the Mayor has recently made a commitment to refurbish the building.
No other options were suggested as part of the Issues and Options consultation.

Implementation

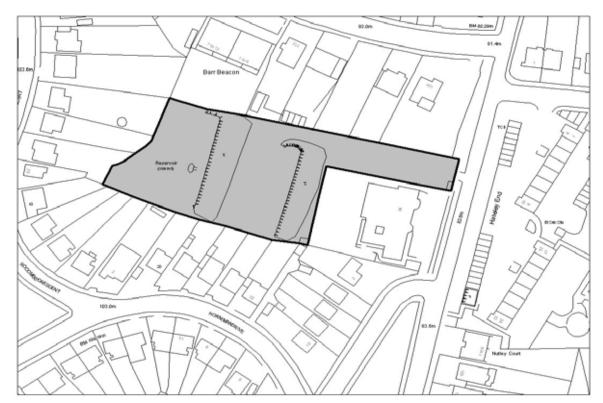
London Borough of Lewisham – short – medium term.

Flood Risk Area

Zone 1 Low probability of flooding.

Site 19 - Honor Oak Road Covered Reservoir

Site Area: 0.49 hectares



Source: Thomas Wren Homes Limited, the owners of this site have proposed that it this site should be redeveloped for housing.

The site is currently designated a site of nature conservation importance in the Lewisham Unitary Development Plan 2004. It is classified as a site of 'Borough Importance'.

The Options

The following options were presented as part of the Issues and Options consultation:-

Option 1: Redevelop for 100% housing.

Option 2: Retain as Site of Nature Conservation Importance and Open Space.

The Preferred Option

Option 2 Retain Site as Site of Nature Conservation Importance and Open Space.

Issues and Options Consultation

Nine responses were received in favour of retaining the open space and nature conservation uses on the site. One response was received in favour of 100% housing development on the site.

Reasons for Preferred Option

The site is classified in the Lewisham Unitary Development Plan 2004 as a Site of Borough Importance for Nature Conservation Grade 2.

The site supports some of the most interesting grasslands in Lewisham and is home to several rare plants and invertebrates. Notable amongst these are the rare heath grass, known nowhere else in Lewisham; cowslip, which has all but disappeared from London, and dog's mercury which is rare in Lewisham. The abundance of Knapweed supports a very rare picture-winged fly, Acinia corniculata, which is classified as 'Endangered', the highest status of rarity in the Red Data Book for inspects, having been recorded from only four other British Sites in Sussex and East Anglia recently (from Ecology Handbook 30, Nature Conservation in Lewisham, London Ecology Unit, 2000). Reviews of the nature conservation value of the site have been made more recently as part of the Public Inquiry into objections to the Lewisham Unitary Development Plan 2004, which confirmed the nature conservation value of the site.

The site was therefore successfully preserved in open space use at the public inquiry in to the Lewisham Unitary Development Plan 2004. The Council also successfully defended the site at an appeal against refusal of planning permission for housing.

It is considered therefore that the importance of preserving the site in favour of nature conservation interests outweighs the provision of a housing site in this instance.

What alternatives were considered and why they were rejected

Option 1: 100% Housing – See reasons above.

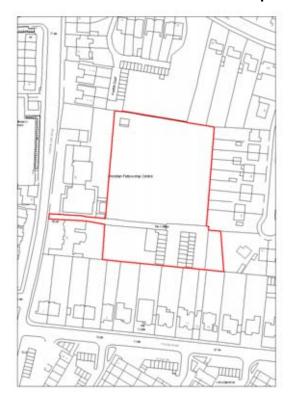
Implementation

The Council's Preferred Option is retention as Local Open Space and a nature reserve. This will continue for the lifetime of this Plan.

Flood Risk Area

Zone 1 Low Probability of Flooding.

Site 20 - rear of Christian Fellowship Centre, Honor Oak Road SE23



Source: Housing Capacity Study

Site Area: 0.82 hectares

This site which is a backland site in a residential area has been the subject of a number of proposals for housing. The site which is steeply sloped presents some design constraints which any scheme for housing will need to overcome.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: Housing.

Option 2: Other uses suggested as part of the

Issues and Options Consultation.

The Preferred Option

Option 1: Housing.

Reasons for the Preferred Option

This site being the former grounds to the buildings facing on to Honor Oak Road is classified as a brownfield site and is therefore considered suitable for housing development. As stated above the site is steeply sloped and presents design and access constraints which will need to be overcome, and will need to harmonise with adjacent housing development. Main access will be from Tyson Road. This is not shown on the above site plan as proposals for this will need to be examined in detail in order to ensure that the context presented by the houses on Tyson Road is not harmed and to minimise any demolition required. Pedestrian access is proposed from Honor Oak Road.

Issues and Options Consultation

Two respondents were in favour of housing development on this site. One respondent was in favour of Housing or Offices or an amenity area. Two respondents thought that the site should be developed as a playground in view of a shortage of local facilities. One respondent identified no Preference. Thames Water Identified no current concerns regarding waste water to this site. Detailed planning proposals would be required in order to ascertain impact on water supply network.

Alternatives were considered and why they were rejected

Alternative uses suggested as a play park or playground where not considered practical due to site ownership and maintenance issues.

Implementation

Private Sector: Short Term.

Flood Risk Area

Zone 1 Low probability of flooding.

Site 21 - rear of 161-171 New Cross Road

Site Area: 0.09 hectares



Source: This site was designated in the Lewisham Unitary Development Plan 2004 for housing.

The site has planning permission for 14 residential units.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: Housing.

Option 2: Mixed use commercial residential.

The Preferred Option

Option 1: Housing.

Reasons for Preferred Option

Although a mixed use commercial and

residential development would make a contribution to the economic life and viability of New Cross Gate, it was considered that on this small site, which is not on a main street frontage, housing development was a more realistic option, and would make a contribution to housing provision targets. As the development has now commenced an allocation for this site will not be included in the Submission Development Plan Document.

Issues and Options Consultation

Two consultation responses were received in relation to this site. But neither of them expressed a preference. Thames Water have no current concerns regarding water supply or waste water to this site.

Alternatives that were considered and why they were rejected

Option 2, a mixed use development was considered unlikely to be successful on this small site which does not have a frontage directly onto New Cross Road.

Implementation

Short Term. The private housing development has now started.

Flood Risk Area

Zone 3 High Probability of Flooding with Low Residual Risk.

Site 22 - Site between New Cross Gate Station and 267 New Cross Road, and 17-25 Goodwood Road

Site Area: 4.96 hectares

Source: Lewisham Unitary Development Plan 2004

Part of this site was designated in the Lewisham Unitary Development Plan 2004 for a mix of



retail, B1 offices, residential and community facility'.

At the time of preparation of the UDP the part of the site directly adjacent to New Cross Station was occupied by a car breakers yard. The use was unauthorised and Network Rail have now cleared the land. The part of the site fronting on to Goodwood Road is occupied by an Engineering Firm. The site was promoted for development in the Lewisham Unitary Development Plan because the previous use was considered to present a poor image of the borough to travellers arriving at New Cross Gate Station and also represented poor use of an important town centre site.

The New Cross Gate retail park is

now included within the site allocation in order to ensure a comprehensive treatment of the area. Part of the site fronting on to New Cross Road is in a Conservation Area. This includes the New Cross Gate station building.

The Options

The following options were presented during the Issues an Options Consultation:

Option 1: Mix of retail, B1 offices, residential and community facility.

Option 2. Other use or mix of uses.

The Preferred Option

Option 1: Mix of retail, B1 offices, residential and community facility together with emerging proposal to have a pedestrian route across the site (from Hatcham Park Road to Batavia Road) and re-building New Cross Gate Station.

Reasons for Preferred Option

The redevelopment will present an opportunity to regenerate New Cross Gate Station, and to improve the image and accessibility of this gateway to the borough, as well providing needed community facilities, housing provision, and a contribution to improving the vitality and viability of the local economy.

Issues and Options Consultation

Two respondents expressed no preference for uses on this site. Thames Water responded that there were 'no current concerns regarding waste water to this site. Insufficient detail is available to comment on water supply. Detailed planning proposals are required in order to ascertain impact on the water supply network'. It should be noted that these comments applied to the smaller site without the addition of the New Cross Gate retail park.

Alternatives that were considered and why they were rejected

No alternatives were suggested as part of the Issues and Options consultation process.

Implementation

Private Sector/Network Rail Medium Tern Network Rail will be using part of this site in the short to medium term for the construction of the East London Railway.

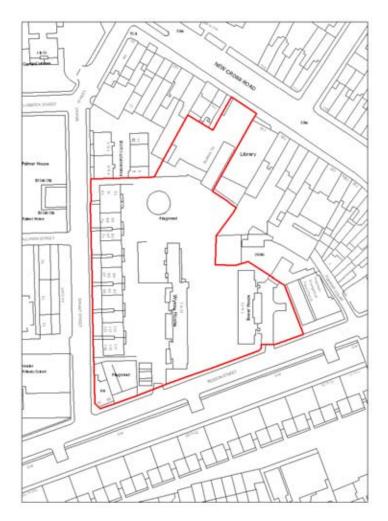
Flood Risk Area

Zone 1 Flood Risk Low Probability of Flooding.

Site 23 - Kender Estate New Cross Gate

Source: New Cross Gate New Deal for Communities

Site Area: 1.05 hectares



New Cross Gate New Deal for Communities (NDC) is a 10 year programme (2001-2011) funded through a £45 million government grant to support sustainable regeneration of the area.

The NDC Centre will be a significant development project providing a focal point for the New Cross Gate Community and an architecturally striking landmark building serving as a catalyst for regeneration in the area.

Most of the site is owned by LB
Lewisham and includes a number
of dilapidated Council blocks
which the Council has been slowly
decanting to make way for the
redevelopment. A secondary site,

a builder's yard is located on New Cross Road. This site is privately owned. This site is considered to be important as it would provide a high street frontage to the development and attract commercial uses.

The frontage of the site on New Cross Road falls within the Hatcham Conservation Area. The 'Music Room' building adjacent to the development sites is considered by the Hatcham Conservation Area Supplementary Planning Document (SPD) to make a positive contribution to the character of the conservation area which it is desirable to preserve or enhance. The Conservation Area SPD also states that the Builder's Yard forms an awkward gap (originally as a result of bomb damage) in the otherwise tightly packed terraces and paired villas in this part of the Conservation Area.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: New Deal for Communities Centre with commercial uses on the New Cross Road frontage (proposed by New Deal for Communities).

Option 2: Housing.

Option 3: Mixed use Commercial and residential development.

Option 4: Other Option suggested as part of the Issues and Options consultation-

Amended Option 1 suggested by New Deal for Communities:- Local community facility with public space and high-density residential units over community uses including doctor's surgery, library, gym, Community hall, café and crèche, with a central high quality public space.

The Preferred Option

Amended Option 1: Local community facility with public space and high-density residential units over community uses including doctor's surgery, library, gym, Community hall, café and crèche, with a central high quality public space.

Reasons for Preferred Option

The amended options provides more details on the proposals by New Deal for Communities on this significant site. The proposal will replace housing on the site and be an important part of the New Deal for Communities development framework for the area. The proposal will result in the creation of new open space, provide a new focus for New Cross Gate and lead to significant improvements to the social and physical characteristics of the area.

Issues and Options consultation

105 respondents thought that the site should accommodate a community centre for elders to replace the Rose Apple Day Centre lost at Giffin Street.

Alternatives that were considered and why they were rejected

Option 1. This option was superseded by a more detailed proposal arising from the Issues and Options consultation

Option 2. This option would replace the relatively poor quality Council blocks on the site, by new high quality housing and make a larger contribution to housing provision targets –it is considered that a mixed use development providing good community facilities would make a better and more sustainable contribution to this town centre location. This option was therefore rejected.

Option 3. This option would make a good contribution to New Cross Gate and to housing provision targets. However a pure commercial and mixed use scheme would be less

desirable in this area which has a high level of deprivation. This option was therefore rejected.

Implementation

Short – Medium term – New Deal for Communities plus partners.

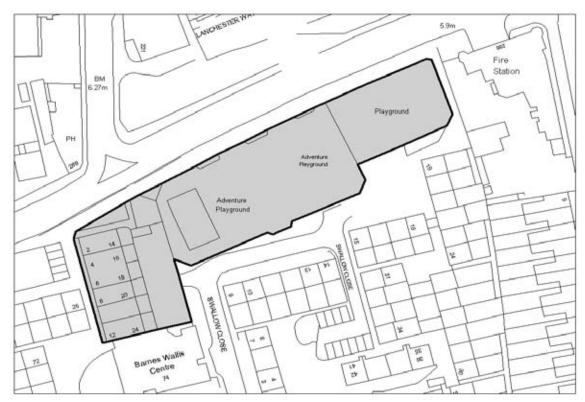
Flood Risk Area

Zone 3 High Probability of Flooding with low/medium residual risk of flooding.

Site 24 - Somerville Adventure Playground, Queens Road

Source: New Deal for Communities (NDC)

Site Area: 0.42 hectares



The NDC wish to improve the adventure playground on the Somerville Estate fronting onto Queens Road. £0.5 million has been allocated to improve these facilities from the NDC programme. The current arrangement presents a poor quality frontage to Queens Road:

- the site has a brick wall facing Queens Road
- the corner of the shopping parade on Wild Goose Drive included within the site shown (between the Adventure Playground and the Barnes Wallace Community Centre) is at right angles to the road and set back with a grassed area which adjoins the entrance to the playground and which is frequently occupied by street drinkers.
- The playground adjacent to the fire station is sloped and in a poor state of repair.

 There is the potential to relocate the shops on Wild Goose Drive to the playground adjacent to the Fire Station with residential above, and to provide an improved Adventure Playground building that is both attractive and secure, and provide a better street frontage to Queens Road. This would leave a vacant site at Wild Goose Drive.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1. Relocate Wild Goose Drive Shops to the playground adjacent to the Fire Station on Queens Road and provide residential above, to provide a better frontage and an improved Adventure Play Ground building.

Option 2. Housing on site of former Wild Goose Drive shops.

Option 3. Replace playground on former site of Wild Goose Drive shops.

Option 4. Other suggested option (s).

The Preferred Option

Option 1: Relocate Wild Goose Drive Shops to the playground adjacent to the Fire Station on Queens Road and provide residential above, to provide a better frontage to Queens Road and an improved Adventure Play Ground building. This option retains the Adventure Playground. The present application is for the construction of a part single/part two storey community building. It would be used to provide art, music and play facilities as well as other uses associated with the adventure playground. The existing building on site would be demolished and the site would be used to house three workshops/containers which would be used for storage and bike and woodwork workshops. A pedestrian link would be formed through the site to provide a direct route from the Somerville Estate to Queens Road and this would be used to enter the proposed community building. A vehicular access would be formed from Swallow Close to the site. The existing entrance to the playground from Queens Road would be retained.

Issues and Options Consultation

Two respondents said that the adventure playground should be retained. One respondent expressed no preference and said that the choice of option should belong to local residents.

Alternatives that were considered and why they were rejected

Options 2 and 3 have not yet been determined by New Deal for Communities. Other options were not suggested during the Issues and Options.

Implementation

New Deal for Communities Short Term.

Flood Risk Area

Zone 3 High probability of flooding with medium residual risk of flooding.

Site 25 - Sites at Nightingale Grove Hither Green

Site Area: 1.43 hectares in total

Source: Urban Design Framework and Development Strategy for Hither Green



These sites are in a mixture of commercial and industrial uses close to Hither Green Station. It includes a driving test centre, older industrial and commercial buildings, and a site housing skips. The Council has approved a design framework to guide new development on these sites, and to upgrade the environment in the approaches to Hither Green Station.

The Options

The following options were presented during the Issues and Options consultation:

Option 1: Housing.

Option 2: Mixed Use Commercial and Residential.

Option 3: Employment Uses (office, industry, warehousing).

Option 4: Community Use.

Option 5: Other uses or combination of uses.

The Preferred Option

Combination of Options 2 Mixed Use Commercial and Residential and 4 Community Use.

Reasons for Preferred Option

The aim of the Hither Green Framework is to improve and upgrade the approaches to Hither Green Station.

Issues and Options Consultation

No specific consultation responses were made in response to these sites.

Alternatives that were considered and why they were rejected

Option 1: 100% Housing was rejected. Although it would make a contribution to housing targets and contribute to the overall environmental and urban design quality of the approaches to Hither Green Station, it was considered that the current mixed use quality of this area should be built on and upgraded to provide a lively and attractive mixed use environment which would also improve feelings of safety and add to the attractiveness to this important area close to a well used station.

Option 3: Employment Uses (office, industry, warehousing). This option was rejected as these sites are in a largely residential area. It was considered that intensification of the industrial/commercial uses in this location would not be suitable either locationally or environmentally.

Option 5: No other options for these sites were suggested during the public consultation on Issues and Options.

Implementation

These sites are not in single ownership. Implementation will depend on a number of private developers coming forward with development proposals.

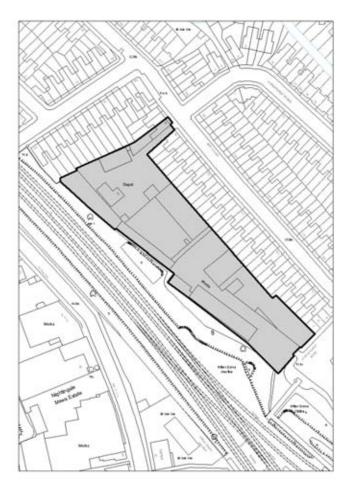
Short – Medium Term.

Flood Risk Area

Zone 1 Low probability of flooding.

Site 26 - 9 Staplehurst Road and rear of Leahurst Road, Hither Green

Site Area: 0.69 hectares



Source: Lewisham Council.

This site comprises a former depot site, and some industrial/warehouse buildings that have recently been in use as a 'Plumb' Trade Centre. It is a backland site and development will need to be compatible with the houses on Leahurst Road. It is also potentially an important site on the approach to Hither Green Station. Schemes have come forward for development of this site. The part of the site on Leahurst road has permission for 14 x 4 bed houses. The 'Plumb Centre' part of the site has been granted planning permission for mixed use commercial, live work and residential development.

The Options

The following options were presented as part of the Issues and Options Consultation;

Option1: Housing.

Option 2: Mixed Use commercial, live-work and residential.

Option 3: Element of retail use.

Option 4: Other use or mix of uses suggested as part of the Issues and Options

consultation.

The Preferred Option

A combination of Option 1 on the Leahurst Road part of the site and Option 2 on the 'Plumb Centre' site. The Preferred Option will remove the Leahurst Road site from the Submission document as housing on this part of the site is currently being built.

Reasons for Preferred Option

Development for 100% housing has commenced on the northern part of the site. Part of the site is considered suitable for a mixed use commercial and residential scheme, that will make

a positive contribution to the mix of uses on the approaches to Hither Green Station, and a contribution to meeting housing provision targets in a brownfield, sustainable location.

Issues and Options Consultation

One consultation response was in favour of community use, one was in favour of Mixed Use Commercial. Residential and live-work use. Two writers expressed no preference. Thames Water expressed no current concerns regarding water supply or waste water capability in relation to this site.

Alternatives that were considered and why they were rejected

Option 1: Housing. A housing development is already underway on the Leahurst Road site. 100% housing on the Plumb Centre site was not considered to take advantage of the possibilities of the site adjacent to a busy commuter rail station to contribute to a mix of uses, and therefore the regeneration of this location. The site with mixed use will also make a contribution to housing targets.

Implementation

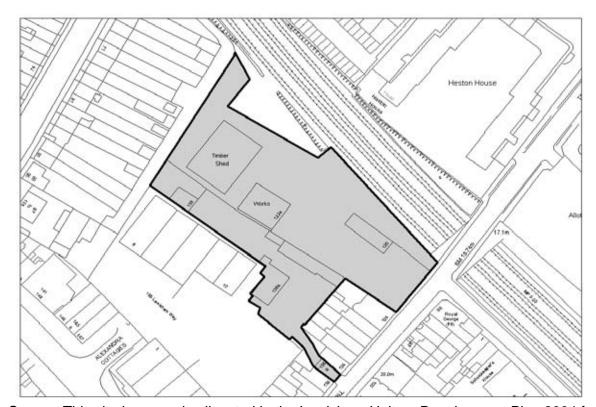
Private Sector Short - Medium Term for 'Plumb Centre' Site.

Flood Risk Area

Zone 1 Low probability of flooding.

Site 27 - Tanners Hill

Site Area: 0.54 hectares



Source: This site is currently allocated in the Lewisham Unitary Development Plan 2004 for residential use.

The site was promoted for housing as the access along Tanners Hill was considered to be inadequate for the commercial and industrial users occupying the site. Residential use was considered to represent an environmental improvement.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: Housing.

Option 2: Site for new secondary school.

Option 3: Other use or mix of uses suggested as part of the Issues and Options Consultation.

The Preferred Option

Option 1: Housing.

Reasons for Preferred Option

Option 1: Housing is considered to be an appropriate use for this site which does not benefit from wide road access, and which can provide a high quality residential environment, re-use a site which had become under-used, and contribute to housing provision figures.

Issues and Options Consultation

No specific responses were received in respect of this site.

Alternatives that were considered and why they were rejected

Option 2: Site for New Secondary School. The New School Campaign suggested that this site, together with the adjacent Lewisham Way Industrial Estate could be used to provide a new secondary school to meet a deficit in school places in the north of the borough. This option was rejected as the Council intends to protect the continual industrial/commercial functioning of the Lewisham Way Industrial Estate. The Council is currently considering three other site options for providing the Secondary School.

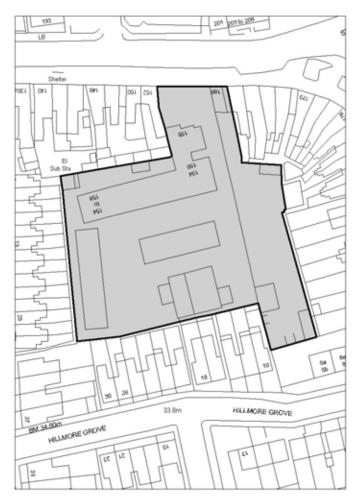
Option 3: Other use or mix of uses suggested as part of the Issues and Options Consultation: No suggestions for other uses on this site were received.

Implementation

Private Sector Short or Medium Term.

Flood Risk Area

Zone 1 Low probability of flooding.



Site 28 - O'Rourke Transport/Sivyer Transport Site, 154-160 Sydenham Road

Source: Housing Capacity Study
Site Area: 0.51 hectares
This site represents a major
employment asset for Sydenham but
also represents an opportunity to

Proposals in the past for this site have involved a mix of employment and residential uses in order to preserve as many jobs as possible on site.

Planning permission was not granted as the proposals would have represented an overdevelopment and on traffic grounds.

The Options

provide housing.

The following options were presented as part of the Issues and Options consultation:

Option 1: Mixed Use employment/residential scheme.

Option 2: 100% Housing.

Option 3: Other use or mix of uses suggested as part of the Issues and Options consultation.

The Preferred Option

Option 1: Mixed Use employment/residential scheme.

Reasons for Preferred Option

The Council considers that a mixed use development on this site would replace the employment use on site and contribute to housing provision.

Issues and Options Consultation

Five people responded specifically in relation to this site. A respondent was in favour of either keeping the employment on site or a retail development (small retail warehouse). One

respondent was in favour of retaining the current employment uses. One respondent preferred a mix of uses but did not specify he mix. Two replies expressed no preference.

Thames Water identified no current concerns regarding waste water to this site. Detailed planning proposals would be required in order to ascertain impact on water supply network.

Alternatives that were considered and why they were rejected

Option 2 100% housing was not chosen as the site is currently in employment use and Council policy on these sites in the case of redevelopment is to promote mixed use commercial residential development that maximises the employment contribution. 100% housing development in this site would represent a lost employment opportunity.

Option 3 Retail Development. This option was not chosen because the boundary of Sydenham Town Centre has been reviewed and the site is no longer classified as edge of centre. and no longer represents a sequentially preferable site.

Implementation

Private Sector short to medium term.

Flood Risk Area

Zone 1 Low probability of Flooding.

Site 29 - 113 - 157 Sydenham Road SE26

Site Area: 0.86 hectares

Source: Lewisham Unitary Development Plan 2004



This site which is in a mixture of ownerships and uses was promoted by the Council in the Unitary Development Plan for a mix of 'retail, leisure, employment and housing, with retention and enhancement of Mews Cottages at 1-8 Berryman's Lane.'

Some development has already taken place on part of the site as it appears in the UDP, and that part of the site has been omitted from the above site boundary.

The Options

The following Options were presented as part of the Issues and Options consultation:

Option 1: Mixed use development retail, employment and housing.

Option 2: 100% residential development.

Option 3: Other use or mix of uses suggested as part of the Issues and Options Consultation.

The Preferred Option

Option 1: Mixed Use development – retail, employment and housing. Public realm improvements would be required as part of the redevelopment.

Reasons for Preferred Option

This mixed use development on a high profile site will enhance the town centre, add to its vitality and viability and provide a contribution to housing provision. Public realm improvements will be required as part of the development.

Issues and Options Consultation

One respondent replied in favour of 100% housing on the site. Two replies expressed no preference for this site. One writer thought a mix of uses and a town square 'green space' for events and markets in Sydenham would be appropriate.

Thames Water expressed no current concerns regarding waste water capability to this site.

Alternatives that were considered and why they were rejected

Option 2: 100% Housing. This option was not chosen as there are currently employment uses on the site. Council policy on these sites is to promote mixed use redevelopment in order to replace employment uses, and to add to housing provision. The site is on a high street and it is considered the opportunity should be taken to enhance the retail offer of the town centre.

Option 3: Retail Development. Retail development would enhance the town centre offer but it was considered that a mix of uses including retail would add more variety and vitality to the economy of the town centre.

Implementation

Private Sector Short to Medium Term.

Flood Risk Area.

Zone 1 Low probability of Flooding.

Site 30 - Rival Envelope Company, Trundleys Road

Site Area: 0.58 hectares

Source: Lewisham Council



These are former industrial premises for which the Council has received a number of proposals for residential and live/work development.

The Options

The following options were presented as part of the Issues and Options consultation:

Option 1: Employment.

Option 2: Mixed use commercial and residential.

Option 3: 100% residential.

Option 4: Other use suggested as part of the Issues and Options consultation.

The Preferred Option

Option 2: Mixed Use commercial and residential.

Reasons for Preferred Option

A mixed use development will contribute to housing provision and replace or increase the employment on site that was housed in older buildings, and which would be unlikely to be renewed by the provision of solely commercial development. A mixed use development with some residential would also improve the environment of the residential uses on the opposite side of the road.

Issues and Options Consultation

No specific consultation responses were received on this site.

Alternatives that were considered and why they were rejected

Option 1: Employment. See reasons above.

Option 3: Residential. Although this would make an increased contribution to housing provision figures this is an employment site and the Council considers that every opportunity should be taken to provide employment in areas where there has been historically high unemployment and to provide diversity and increase the vitality of the local economy.

Option 4: Other use suggested as part of the Issues and Options consultation. No other uses were suggested as part of the consultation.

Implementation

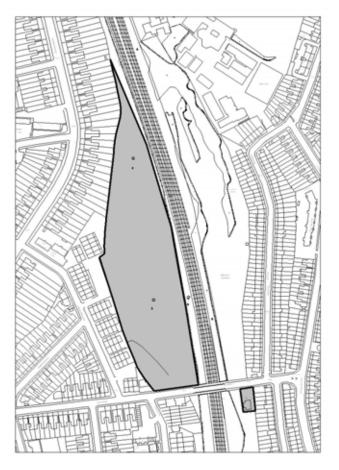
Private Sector Short to Medium Term.

Flood Risk Area

Zone 3 High Flood Risk with high to medium residual risk of flooding.

Site 31 - Nature Reserve, corner of Vesta Road and the Brockley to New Cross Gate Railway and 'Scout Hut' corner of Vesta Road and the Brockley to New Cross Gate railway

Site Area: Nature Reserve 2.75 hectares Scout Hut 0.05 hectares



Source: Local Resident.

A local resident has suggested that these sites should be developed for housing. He states that the railway cutting (which is designated as a Site of Nature Conservation Importance in the Lewisham Unitary Development Plan) is a Nature Reserve but is no longer staffed and open to the public. The Scout Hut is also locked and vacant.

The Scout Hut has received planning permission in 2004 for residential use (a three storey block comprising five flats). This permission has now been implemented.

The Options

The following options were presented as

part of the Issues and Options Consultation:

Option 1. Continue to protect the Nature Reserve from development (Site of Nature Conservation Importance.

Option 2: Redevelop for housing.

The Preferred Option

Option 1: Retain site of Nature Conservation Importance.

Reasons for the Preferred Option

The Railway Cutting is a graded as a site of Metropolitan Nature Conservation Importance in the Unitary Development Plan and 'contains probably the finest suite of railside wildlife habitats in London'. The value of this site therefore outweighs the contribution it would make to meeting housing provision targets.

The site is also zoned as Urban Green Space in the Unitary Development Plan. This zoning means that the site is also considered to perform a valuable open space function in the area even though it is not usually accessible to the public. It should be noted that the residential development on the 'Scout Hut' site is being constructed.

Issues and Options Consultation

Network Rail stated that part of this large site could realistically be used for housing and still preserve the habitat qualities of the site

What alternatives were considered and why they were rejected

Option 2: Housing. This site could provide a contribution to meeting housing targets and provide a good residential environment. However this would be development on a Greenfield site, which will be classified as open space and is a site of Nature Conservation Importance of Metropolitan Importance. In this case the importance to the natural environment and biodiversity of Lewisham of these designation outweighs the need to provide housing. The option was therefore rejected.

Implementation

The Council is not proposing a preferred option that requires a timetable for development.

Flood Risk Area

Zone 1 Low probability of flooding.

Site32 – Downham Lifestyles Project

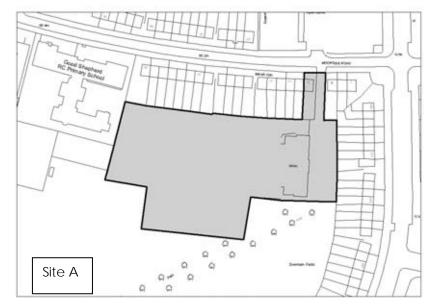
(Site A) Downham Library (0.96 hectares)

(Site B), Downham Lane Depot (0.6 hectares + 0.2 hectares of current open space forming part of Downham Playing Fields)

(Site C) Land to the rear of 80, Downham Way (0.2 hectares to become public open space)

(Site D) Downham Playing Fields (7.2 hectares)

Source: Downham Lifestyles Project Development Brief and the Lewisham Unitary Development Plan 2004 (UDP)



The development of these sites forms part of the Downham Lifestyles Project Private Finance Initiative being progressed by the Council.

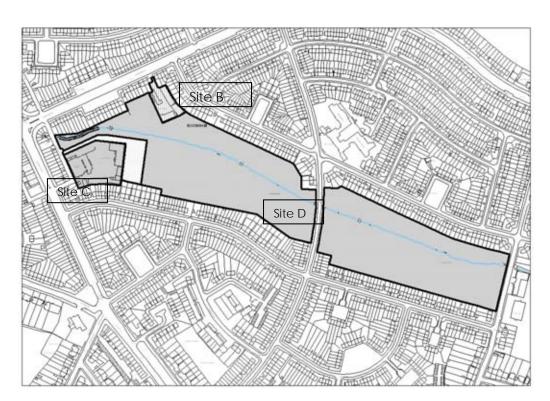
Site A is the area of land that was occupied by Downham Library, a public swimming pool now

closed and a clubroom. Site A further includes a residential property No 9 Moorside Road which is proposed to be demolished. This site is identified by the PFI Scheme as being the future site for the Downham Lifestyles Centre. In summary the Centre will accommodate:

- Sport and leisure facilities including a 25 metre swimming pool;
- A new library;
- Health facilities, including practice rooms, dental unit, community nursing units and supporting accommodation
- Other community facilities including community hall and room, exhibition space, crèche and café.

The uses on this site therefore remain unchanged.

Site B is a level site of 0.8 hectares, consisting of the Depot (0.6 hectares) and land currently forming part of Downham Playing Fields (0.2 hectares). The additional 0.2 hectares of land would serve to consolidate the development site. It is the equivalent to the area of land



currently occupied by Site C, which in turn is to become public open space. Through this swapping of land uses there would be

no net loss of open space.

This site is also identified in the Lewisham Unitary Development Plan as suitable for retail (or leisure or housing). The Downham Lifestyles Project Brief states that the 'Site has not proved attractive to retail investors........With the Downham Lifestyles project proposing significant new formal and informal leisure opportunities on Sites A, C and D, the Council now consider that there is no additional requirement for leisure development on Site B. The preferred land use for Site B is therefore residential.' It would also include an attractive route from Bromley Road to the Park.

Site C at the rear of 80 Downham Way is owned by Lewisham Council and used temporarily by external contractors to the Council. The Project Brief considers that continued use as a depot would not be suitable as it might conflict with neighbouring residential and open space uses and proposes its conversion to provide additional open space, and integration into Site D 'The Community Park'.

Site D is currently used as sports fields with no public access. The Downham Brief seeks the redevelopment of the playing fields into a Community Park that is publicly accessible in hours of daylight.

The Preferred Option

These schemes are being or have been implemented. The Preferred Option is therefore to not include these sites in the Council's Site Allocations submission document.

Issues and Options Consultation

No specific consultation responses were received in relation to this project.

What alternatives were considered and why they were rejected

These projects were part of an agreed PFI and so other options were not presented.

Implementation

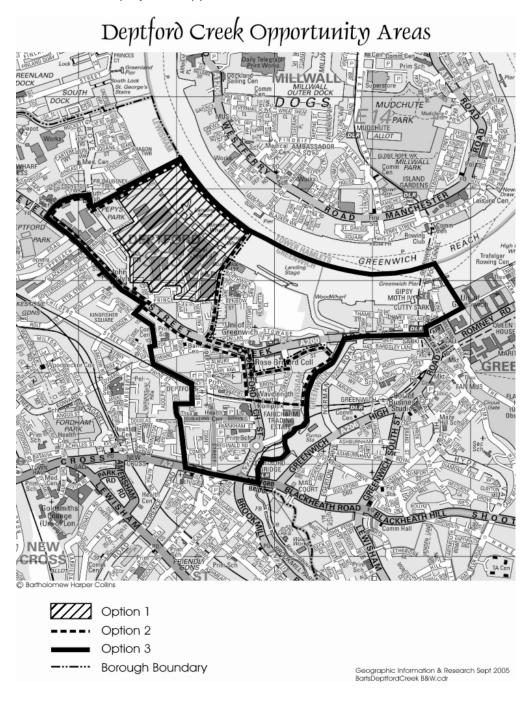
These schemes are all on site and are being implemented.

Flood Risk Area

Zone 1 Low probability of flooding.

Deptford Creek Opportunity Area

The London Plan and the draft Strategic Regional Development Framework for East London being prepared by the Mayor Of London requires the Council, and the adjoining London Borough of Greenwich to propose a new policy allocation in their Local Development Frameworks called the Deptford Creek/Greenwich Riverside Opportunity Area. The London Plan proposes a number of targets within this area to increase the number of dwellings and the number of employment opportunities.



The Options

Options for the boundary of the Opportunity Area were presented during the Issues and Options consultation as follows:

Option 1 is a minimum area including Convoys Wharf only.

Option 2 includes additionally part of Deptford Creekside and part of Deptford High Street.

Option 3 shows a possible wider Opportunity Area including all of Deptford High Street and all the Creekside area in Lewisham.

The Preferred Option

Option 3: Wider Opportunity Area.

Reasons for Preferred Option

This option covers a wide area in Deptford where opportunities for development are available and meets the aims of declaring the Opportunity Area.

Issues and Options Consultation

Three responses were received. One respondent made a number of suggestions for inclusion of sits in the opportunity area which are met by the adoption of Option 3. One respondent was in favour of Option 3. One respondent thought that this was entirely a local matter and should not be referred to in the London Plan.

Alternatives that were considered and why they were rejected.

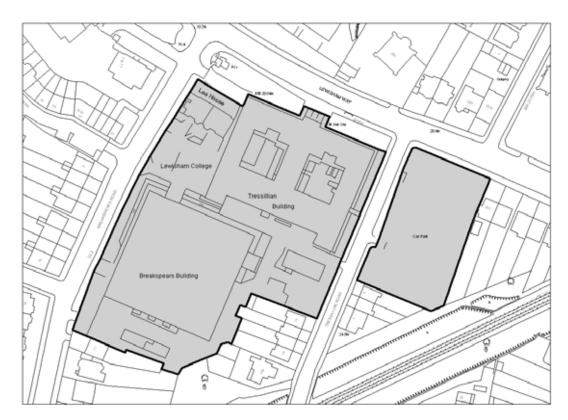
Options 1 and 2 were considered to unduly narrow possibilities presented by the Opportunity Area.

Education Sites

Site 33 – Lewisham College, Lewisham Way SE13

Source: Lewisham Planning Service

Site area 1.8 Ha



The site is in the Brockley Conservation area; Lea House being is a listed building, and the Tressillian building makes a positive contribution to the Conservation Area. This site is currently used by Lewisham College for educational purposes. In the lifetime of the LDF (10-15 years) the site may become available for redevelopment as the college is looking to consolidate its operations and relocate to its Deptford campus or the Lewisham Gateway Scheme.

The Options

The following options were presented as part of the Issues and Options:

Option 1: Site to be safeguarded for continuing education use.

Option 2: Residential development.

Option 3: Mixed use redevelopment.

The Preferred Options

Option 2 and 3: The preferred option is mixed use or residential development with a relocation of the campus to the campus in Deptford or the Lewisham Gateway Scheme.

Reasons for preferred option

The college may potentially consolidate their educational facilities and bring them closer together around Deptford, whereby they will be able to release the site on Lewisham Way. If the site becomes available the most appropriate redevelopment will be residential

development or limited mixed use due to the conservation area status and proximity to transport links.

Issues and options consultation

Eight out of 10 responses supported the option of safeguarding the site for continuing education use. The option for allocating the sites for residential development was supported in 1 out of 5 responses and the mixed use option was only favoured in 3 out of 8 responses.

Alternatives considered and why they were rejected

Option 1 – Safeguarding the site for education only purposes is not considered to be essential as the existing facilities will be relocated to an area which will be easily accessible.

Implementation
Medium to long term

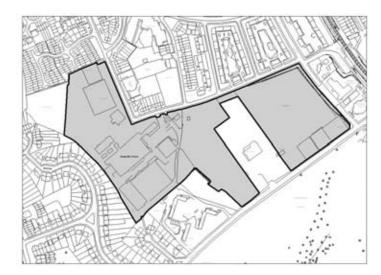
Flood risk area

Zone 1

Site 34 – Sedgehill School and sites on Beckenham Hill Road

Source: Lewisham Education Directorate

Site area 9.16Ha



This land is designated as Metropolitan Open Land in the Lewisham Unitary Development Plan 2004. This means that only development that preserves the open space character of the land will be acceptable.

Part of the site is currently occupied by Sedgehill School.

The Options

The following options were presented as part of the Issues and Options:

Option 1: Relocation of school within the site

The Preferred Option

Option 1: The preferred option is a relocation of the school within the site

Reasons for preferred option

Only one option was proposed for this school site. The school is a 1960s construction and is inadequate in terms of current capacity and the quality of facilities. A redevelopment of the school on the existing site has been proposed which will increase the capacity, increase accessible open space by condensing the footprint, and bring much needed improvements to the facilities.

Issues and options consultation

2 out of 7 responses supported the option for continuing use of the site for educational purposes.

Alternatives considered and why they were rejected Only one option was proposed for this site.

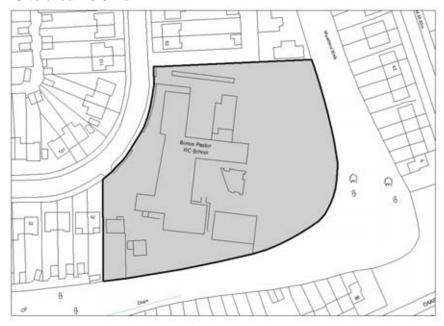
Implementation
Short term

Flood risk area Zone 1

Site 35 – Bonus Pastor School (Secondary)

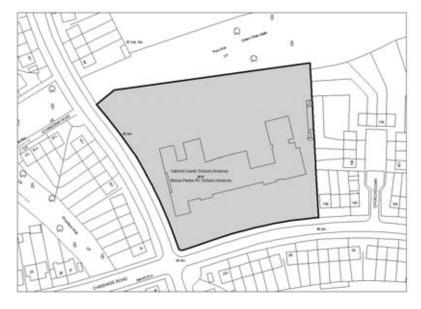
Source: Lewisham Education Directorate

Site area: 0.8 Ha



The Bonus Pastor school is currently on two sites as shown on the attached maps. There are currently 750 pupils and the split site arrangement is not considered satisfactory from an educational point of view.

The Education directorate at Lewisham consider that neither of the existing sites are large enough to accommodate a single school.



Options

The following options were presented as part of the Issues and Options:

Option 1: relocation of school to a single site

Option 2: Redevelopment of existing sites to other uses provided new school site is found

Option 3: Redevelopment of one of the sites for higher density to accommodate the school

Option 4: Retain current use

The Preferred Option

Option 4: The preferred option is to retain the two school sites in their current use.

Reasons for preferred option

An alternative school site has not been found, hence the site were retained in its current usage.

Issues and options consultation

2 out of 5 responses supported the option for redevelopment of one of the school sites to high density to accommodate the single school

What alternatives were considered and why they were rejected

Options 1 and 2 – An alternative site was not found for the school hence these options were not feasible.

Option 3 - high density development was not considered to be an appropriate option for the school sites.

Implementation
Not applicable

Flood risk area

Zone 1

Site 36 – Deptford Green School (Secondary)

Source: Lewisham Education Directorate

Site areas: Main School 1.1 Ha, School Annex 0.3 Ha



The Deptford Green school is currently on two sites as shown on the attached maps. There are currently 1,200 pupils and the split site arrangement is not considered satisfactory from an educational point of view.

The Options

The following options were presented as part of the Issues and Options:

Option 1: Redevelop a single school on the Edward Street Annex site adjacent to Fordham Park

The Preferred Option

Not yet determined. The preferred option is to retain the two school sites in their current use until a decision has been made.

Reasons for preferred option

Only one option was presented at the issues and options stage. If the proposed option is agreed upon the site will retain the current use while maintaining the Amersham Vale site operationally during the building period until a decant can take place. This could involve the loss of some open space which would need to be replaced possibly from the Amersham vale site after demolition.

Issues and options consultation

4 of 6 responses supported the use of the Edward street site for a single school

What alternatives were considered and why they were rejected Only one option was presented at the issues and options stage.

Implementation
Not applicable

Flood risk area

Zone 3

New School Site – Lewisham Bridge School

An option put forward at the issues and options stage was for the redevelopment of Ladywell Leisure Centre site to make way for a new secondary school. After consultation on 2002, the Ladywell Leisure Centre emerged as the preferred location for a new secondary school.

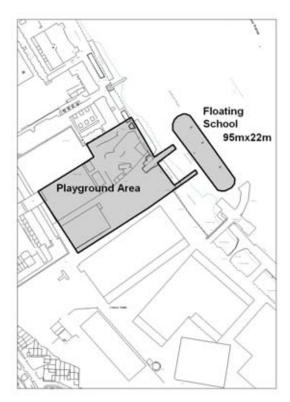
Due to the new planning process developers and local people were asked to suggest alternative sites for redevelopment. As a result the New School campaign submitted three alternatives sites for the new school, (sites A, B and C as described below). These were subject to consultation during the issues and options stage, though it was made clear at that stage that the Mayor of Lewisham had already agreed the new school site on the site of Ladywell Leisure Centre.

Due to public campaigning to retain the Ladywell Leisure Centre until a new facility is provided within the town centre, the decision of the Mayor and Cabinet in September 2006 was to look further at the feasibility of an alternative site for the new secondary school. The assessment identified two alternative sites to the ones consulted on during issues and options, Lewisham Bridge primary school and land at Lewisham Hospital. On receiving the in-depth appraisal from officers at the Mayor and Cabinet meeting on 8th November 2006, it was decided to pursue the Lewisham Bridge site because it is considered to be the most suitable location being in a central area, close to Lewisham town centre, with good public transport links (Lewisham train station and DLR).

The proposed sites during the issues and options stage (below) are hence not our preferred options for a new school site.

Site A – New School Site (floating school on River Thames)

Source: New School Campaign



The New School Campaign have stated that this is a radical option but that there are a number of advantages such as cost and the time within which it can be delivered. They acknowledge that there is a need to convince the Port of London Authority (PLA) that this is a viable and acceptable venture.

It is not clear to the Council that sufficient feasibility work has been undertaken on this proposal. Apart from the possible objections from the PLA, the site owners of Convoys Wharf have not agreed to this proposal. It is also not clear how access would be gained to the floating school and how upper Pepys park would be used in connection with the school. The Council has resolved to grant planning permission for a planning application which would exclude the possibility of a floating school at this location.

The Options

The following options were presented as part of the Issues and Options:

Option 1: New Floating school

The Preferred Options

The preferred option is to reject a proposal for a floating school

Reasons for the Preferred Option

The option for the floating school was rejected on the basis of uncertainties around health and safety issues that required further evidence. It was considered more appropriate to explore all possible options on land before proceeding with this as a stronger evidence base would be required in support of this option.

Issues and options consultation

6 out of 10 responses were in support of the floating school option

Alternatives considered and why they were rejected Only one option was presented.

Timescale Not applicable

Flood risk area

Zone 3

Site B – New School Site (Florence Road, Deptford)

Source: New School Campaign

Site area: 1.6 Ha



The New School Campaign state that this site is currently used for industrial and business uses and is partly vacant. The area shown contains the businesses on Lewisham Way along the section from Tanners Hill to the entrance to the estate. Although they state that it may not be necessary to include the businesses, depending upon the design and capacity of the new school. The proposal includes building over the railway which is in cutting at this point to provide a playground area.

The Councils Town Planning Service has identified the part of the site which is currently vacant as a potential housing site in the London Housing Capacity Study 2005 and in the Lewisham UDP. The current UDP contains policies to protect viable employment land uses as the borough has a very small internal economic base. The industrial site on Lewisham Way is relatively

modern purpose built and has constantly been fully let. In addition, sites in multiple ownership are more difficult to purchase for redevelopment than single ownership sites.

The Options

The following options were presented as part of the Issues and Options:

Option 1: New school on this site

The Preferred Options

The preferred option is to retain the site in its current usage, with housing on the part of the site close to the railway line. The industrial estate adjacent to Lewisham Way is designated as Local Employment Location as a Preferred Option in the Employment Chapter of this document. The Preferred Option for the part of the site between the industrial estate and the railway is housing development see Site 27 Tanners Hill in this chapter.

Reasons for preferred option

The southern part of the site has been allocated for employment use, which is consistent with our employment land objectives. The part of land adjoining the railway line is suitable for housing. The option for a school was hence an unsuitable option for this site.

Issues and options consultation

7 out of 10 responses supported the option of a new school on the site

What alternatives were considered and why they were rejected

Only one option was presented.

Timescale
Not applicable

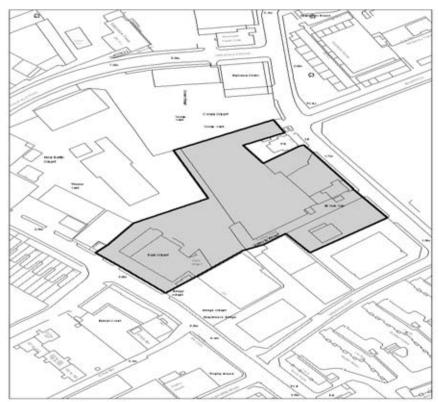
Flood risk area

Zone 3

Site C - New School Site (Evelyn Street, Deptford)

Source: New School Campaign

Site area: 1.4 Ha



The New School Campaign have stated that the site is large enough for a new school, that it is in the right location and that funds can be acquired from the Department for Education and Science. They further state that the site is currently in low grade industrial use.

The site is currently allocated as a Defined Employment Area in the UDP, and is part of the Surrey Canal Strategic Employment Location in the London Plan. This would normally allow planning applications for business, industrial and storage and distribution uses to be supported. Due to the low level of employment land provisions within the Borough such uses need to be protected and maintained. The site also currently has some bad neighbour use including a recycling plant.

The Options

The following options were presented as part of the Issues and Options:

Option 1: New school on this site

The Preferred Option

The preferred option is to retain the site in its current usage.

Reasons for preferred option

The proposed site has been identified in the north Lewisham Masterplan as being within an area that is large enough to become a significant new place in its own right. The Masterplan identifies the area for mixed use development, high quality landscaping, new public spaces and the reinstatement of the surrey canal, which meet the aims of the core strategy.

Issues and options consultation

7 out of 9 responses were in support of a new school on the site

What alternatives were considered and why they were rejected Only one options was presented for this site

Timescale
Not applicable

Flood risk area

Zone 3

5. IMPLEMENTATION AND MONITORING

The Development Policies and Site Allocations Development Plan Document (DPD) forms the basis of a strategic framework to guide and inform the future regeneration of Lewisham. The private and public sector will be able to use this plan to prepare and inform schemes and projects consistent with the vision. These schemes will vary from large scale projects of strategic importance to smaller projects of local influence, and straight forward change-of-use applications.

The issue of securing funding, both public and private sector, and establishing an appropriate delivery framework for the elements that make up the development policies and site allocations is central to the realisation of the vision.

The policies provide a comprehensive and integrated framework for change and growth; and set down the Council's expectations in terms of location, design quality and innovation. It also identify a comprehensive package of environmental, social/community and infrastructure projects/initiatives to serve the needs of existing and projected new populations, and improvements to the quality of the environment.

The Council is committed to the comprehensive delivery of all aspects of the Preferred Options report and recognises that in order to secure delivery it will be necessary to:

- Create the conditions required to stimulate investor confidence
- Work with and encourage developers and landowners to bring forward their land and buildings for development/redevelopment
- Engage with other public sector stakeholders and the voluntary sector responsible for the delivery of different aspects of the development policies and site allocations
- Promote and encourage the delivery of design excellence and innovation
- Secure necessary highway improvements, accommodate new public transport infrastructure, enhance the public realm and improve pedestrian linkages
- Ensure the delivery of a built form and public realm of the highest design quality
- Put in place measures to secure the long term management and maintenance of the public realm and
- Put in place appropriate measures to ensure ongoing consultation and involvement of the resident and business community.

In pursuit of the above the Council will:

1. Encourage partnership working

The Council will work in partnership with a range of public, private and voluntary sector organisations in order to ensure the delivery of the development policies and site allocations. Key partners will include:

- Lewisham Strategic Partnership
- Public organisations such as the Greater London Authority, London Development Agency, Thames Gateway Development Corporation, English Partnerships and the Environment Agency
- Transport operators, Transport for London and Network Rail

- Landowners and potential developers
- Registered Social Landlords
- Existing businesses and business organisations
- Community and voluntary sector organisations
- Local residents
- Primary Care Trust
- The emergency services.

The Council already works with several of the above and will continue to develop these relationships in the future to ensure the delivery of the Local Development Framework vision.

2. Continue to work with Transport for London and other transport partners on the delivery of transport improvements

The policies promote a sustainable transport strategy and the delivery of public transport improvements. The Council will continue to work with its partners to secure the delivery of improvements in relation to the phasing of development. The projects are aligned with that of the Lewisham Local Implementation Plan (LIP), the local Transport Strategy. The proposals are also designed to work towards TfLs Area Based Scheme objective.

3. Use of Compulsory Purchase powers to bring forward land for development

The policies are intended to encourage third party landowners and developers to bring forward their land and buildings for development/redevelopment. The Council will work with the landowner/developers to assist the process of bringing forward development within the plan period and beyond. It is accepted, however that there will be sites where landowners may be reluctant or unwilling to bring forward their land for development. In such circumstances the Council may choose to use its compulsory purchase powers to achieve the plan's objectives.

4. Secure developer contributions towards the improvement of the public realm and transport improvements and the delivery of employment and training initiatives, social and community facilities.

The Council, as a planning authority will be responsible for ensuring that the environmental and infrastructure improvements and community facilities required as a result of increased development are secured and implemented in an appropriate manner. The funding and delivery of such will be secured via a planning obligation agreement or by conditions attached to any planning permission.

The legal framework for planning obligations is Section 106 contained within the Town and Country Planning Act 1990 and associated Circular 05/2005. In accordance with the requirements of the Circular, planning obligations will be related to the needs and demands generated by each development and to the viability of provision. Individual developer obligations will fall into two categories:

- Those requirements that are essential to the development of each individual site i.e. the provision of affordable housing, open space, access, car and cycle parking, land use and sustainability targets.
- Financial contributions i.e. financial and other contributions to area wide facilities and benefits.

The Council is currently in the process of producing a Supplementary Planning Document (SPD) for planning obligations as part of the LDF. The Council proposes to use this document as a starting point or baseline position in the negotiation of each individual development contribution package. Once the contribution has been paid it will be placed within a pooled fund and will be used to realise a range of transport/ environmental and social/ community facilities.

5. Co-ordinate public sector funding to support the delivery of key infrastructure projects

The borough could benefit from a range of special funding programmes, primarily from public sector funding sources. These will be co-ordinated and prioritised in line with development phasing and will be used to help deliver the environmental/infrastructure improvements and community/social facilities.

6. Monitoring the policies

Each policy will be monitored to ensure it achieves its objective. Such measures will include:

- Adherence to PPS6 recommendations for town centre 'health check' monitoring
- Liaison with the Town Centre Manager on monitoring and implementation
- Housing completions, especially affordable housing
- Employment land provision
- Renewable energy provision and capacity
- Car parking provision
- Quality and quantity of open space
- Community and health services and facilities provision.

The Council recognises that in order to be sure that we are delivering on sustainable development and sustainable communities. We need to be able to check on whether these aims are being achieved. This allows the Council to be able to be flexible in updating the LDF to reflect changing circumstances.

In view of the importance of monitoring, Section 35 of the Planning and Compulsory Purchase Act 2004 requires every Local Planning Authority to make an annual report to the Secretary of State containing information on the implementation of the Local Development Scheme and the extent to which the policies set out in local development documents are being achieved. The Council have published the latest Annual Monitoring Report in a separate document.

The following table is an indicative approach of what the Council may pursue to ensure the delivery of the development policies and site allocations. It should be noted that the format and structure may change before formal submission to the Secretary of State.

APPENDIX 1 – GLOSSARY OF TERMS

Accessibility	 The extent to which employment, goods and services are made available to people, either through close proximity, or through providing the required physical links to enable people to be transported to locations where they are available. The extent of barriers to movement for users who may experience problems getting from one place to another, including disabled people.
Affordable Housing	The Department of Communities and Local Government defines affordable housing as housing that is designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough. Affordable housing comprises social housing, intermediate housing. Social housing is defined as: Rented housing owned and managed by local authorities and registered social landlords. Intermediate housing is defined as: Housing at prices and rents above those of social rent, but below market price or rents.
Air Quality Management Area	The Council monitors local air quality and prepares action plans to improve local circumstances
Amenity	An amenity is an element of a location or neighbourhood that helps to make it attractive or enjoyable for residents and visitors.
Annual Monitoring Report (AMR)	The AMR is a statutory document which includes information on progress on the Local Development Framework, as well as monitoring information required by the Department of Communities and Local Government.
Area Action Plan (AAP)	A DPD which provides a planning framework for specific areas in the Borough where there is a concentration of proposals or land-uses which are complex.
Best Value	A government indicator by which an authority
Performance	measures, manages and improves its
Indicator (BVPI)	performance.
Biodiversity	This refers to the variety of plants and animals and other living things in a particular

	area or region. It encompasses habitat
	diversity, species diversity and genetic
	diversity. Biodiversity has value in its own
	right and has social and economic value for
	human society.
Brownfield Land	Both land and premises are included in this
	term, which refers to a site that has
	previously been used or developed and is
	not currently fully in use, although it may be
	partially occupied or utilised.
	It may also be vacant, derelict or
	contaminated. This excludes open spaces
	and land where the remains of previous use
	have blended into the landscape, or have
	been overtaken by nature conservation value
	or amenity use and cannot be regarded as
	requiring development.
Carbon dioxide	Releases of carbon to the atmosphere as
Emissions (CO ₂)	part of compounds that arise from man-made
	processes such as energy use or agriculture.
Climate change	A change of climate, which is attributed
- Cimilate change	directly or indirectly to human activity, that
	alters the composition of the global
	atmosphere, and, which is in addition to
	natural climate variability over comparable
	periods.
Community Strategy	A practical tool for promoting or improving
	the economic, social and environmental
	wellbeing of the area of jurisdiction of a Local
	Authority. Such strategies are to be prepared
	allowing for local communities (based upon
	allowing for local communities (based upon geography and/or interest) to articulate their
	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities.
Comparison Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear,
Comparison Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers
Comparison Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail
Comparison Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with
Comparison Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as
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Convenience Goods Density of	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is
Convenience Goods	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually
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Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually
Convenience Goods Density of	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the
Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such
Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such as the UDP. The process for preparing a
Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such as the UDP. The process for preparing a DPD is a long one, involving three statutory
Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and , where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such as the UDP. The process for preparing a
Convenience Goods Density of housing	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such as the UDP. The process for preparing a DPD is a long one, involving three statutory consultation periods and an examination in
Convenience Goods Density of housing Development Plan Document (DPD)	allowing for local communities (based upon geography and/or interest) to articulate their aspirations, needs and priorities. Items such as jewellery, cosmetics, footwear, electrical goods and, where shoppers typically prefer to have a choice of retail outlets in order to compare an article with others of the same type. Also referred to as 'durable goods'. Goods bought frequently or out of necessity such as food, tobacco and newspapers. The degree to which a given area of land is filled or occupied by housing usually measured as dwellings or habitable rooms per hectare. A document within the LDF that has the status of a statutory development plan such as the UDP. The process for preparing a DPD is a long one, involving three statutory consultation periods and an examination in public.

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	the need for a high quality of life and a safe
	and healthy internal environment.
Examination in	An examination chaired by an independent
Public	inspector to consider objections to a DPD
	and the overall "soundness" of the document
	in accordance with specific tests.
Flood risk	The 'risk' of flooding can be considered as
1 lood lisk	the product of the probability of a flood
	occurring and the consequences of the flood.
GOL	Government Office for London
332	Government emice for Edition
Infrastructure	In this context means the different connected
	elements which make up and help support a
	place. It can include transport infrastructure
	such as roads, railways, bridges and
	footpaths or social infrastructure such as
	surgeries, schools and community halls.
Local Development Scheme (LDS)	Sets out the timetable for the preparation of
	LDDs, usually in a three year rolling cycle.
Local Development Frameworks	A portfolio of LDDs which provide the
(LDFs)	framework for delivering the spatial planning
	strategy for the area.
Local Development Documents	Comprises the development plan documents
(LDDs)	(DPDs) and the Statement of Community
	Involvement (SCI). Each document can be
	adopted and revised as a single entity (unlike
	the UDP process which was normally revised
Local	as a whole).
Implementation	Statutory transport plan produced by each London borough, bringing together transport
Implementation Plan	proposals to implement the Mayor's
Fiaii	Transport Strategy at the local level.
London Plan	This is the spatial development strategy for
London Flan	London adopted in February 2004 and
	prepared by the Mayor of London. Although
	it has been produced to provide a strategic
	framework for the Borough's LDF, it serves
	the same purpose for outgoing UDPs. It also
	has the status of a development plan under
	the Planning & Compulsory Purchase Act
	2004.
Mixed use	Development for a variety of activities on
	single sites or across wider areas such as
	town centres.
Opportunity Area	town centres. These are identified in the Mayor's London
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes,
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and
Opportunity Area	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport
	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.
Opportunity Area Preferred Options	town centres. These are identified in the Mayor's London Plan as areas that have an opportunity to accommodate large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and/or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport

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	Paper. This document will set out the
	Council's preferred approach to
	development, taking into account
	the evidence collected and the consultations received.
Public Transport	Public Transport Accessibility levels are a
Accessibility (PTAL)	detailed and accurate measure of local
	accessibility to the public transport network.
	PTALS are produced by Transport for
	London (TfL).
Public Realm	This is the space between and within
	buildings that are publicly accessible,
	including streets, squares, forecourts, parks
	and open spaces.
Recycling	The reprocessing of waste, either into the
	same product or a different one. Many non-
	hazardous wastes such as paper, glass,
	cardboard, plastics and metals can be
	recycled. Hazardous wastes such as
	solvents can also be recycled by specialist
Spatial Planning	companies, or by in-house equipment.
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. This will include policies which can
	impact on land use by influencing the
	demands on, or needs 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.
Spatial (core) Strategy	A Local Development Plan Document which
Cranar (core) changy	sets out the long term spatial vision for the
	local planning authority.
Statement of Community Involvement	An LDD which sets out the methods and
(SCI)	standards which the local planning authority
	intends to achieve in relation to involving the
	community in the preparation, alteration and
	review of all LDDs and in significant
	development control decisions. The SCI is
	not a DPD, but is subject to independent
	examination.
Strategic	These comprise Preferred Industrial
Employment	Locations, Industrial Business Parks and
Locations (SELs)	Science Parks and exist to ensure that
	London provides sufficient quality sites, in
	appropriate locations, to meet the needs of
	the general business, industrial and
	warehousing sectors.
Section 106 (S106) Planning	Refers to section 106 of the Town and
Obligations	Country Planning Act 1990 (As amended) A
	direct provision of items by the developer or
	a financial contribution or a mix of these

	1
	types.
Supplementary Planning Documents	Replaces the UDP's Supplementary
(SPD)	Planning Guidance (SPG's). These are non-
	statutory LDDs that expand upon policies
	and proposals in DPDs. These documents
	will be treated as a material consideration in
	relation to planning applications.
Sustainability	Sustainability is a measure of how well an
	action or actions can be considered to meet
	the needs of people today, without
	compromising the ability of future
	generations to meet their own needs.
Sustainability	An appraisal of the economic, environmental
Appraisal (SA)	and social effects of a plan from the outset of
,	the preparation process to allow decisions to
	be made that accord with sustainable
	development.
Sustainable	This covers development that meets the
Development	needs of the present without compromising
·	the ability of future generations to meet their
	own needs.
Site of Nature Conservation	Sites of Metropolitan, Borough or Local
Importance (SNCI)	Nature Conservation Importance.
Unitary Development Plan (UDP)	The current Borough-wide statutory
	development plan, setting the Council's
	policies and proposals for the development
	and use of land. Introduced in 1986, they
	are to be replaced by Local Development
	Frameworks as a result of the Planning
	Compulsory Act 2004. Lewisham's existing
	UDP was adopted in July 2004.

APPENDIX 2 – NATIONAL AND REGIONAL POLICY

National Planning Policy

Planning Policy Statement 1 – Delivering Sustainable Development (PPS1) provides an overview of the Governments key policies for the planning system. In preparing development plans (such as the Spatial (Core) Strategy), PPS1 advises planning authorities to:

- (i) Promote national, regional, sub-regional and local economies by providing, in support of the Regional Economic Strategy, a positive planning framework for sustainable economic growth to support efficient, competitive and innovative business, commercial and industrial sectors.
- (ii) Promote urban and rural regeneration to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities. Policies should promote mixed use developments for locations that allow the creation of linkages between different uses and can thereby create more vibrant places.
- (iii) Promote communities which are inclusive, healthy, safe and crime free, whilst respecting the diverse needs of communities and the special needs of particular sectors of the community.
- (iv) Bring forward sufficient land of a suitable quality in appropriate locations to meet the expected needs for housing, for industrial development, for the exploitation of raw materials such as minerals, for retail and commercial development, and for leisure and recreation taking into account issues such as accessibility and sustainable transport needs, the provision of essential infrastructure, including for sustainable waste management, and the need to avoid flood risk and other natural hazards.
- (v) Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, while recognising that this may be more difficult in rural areas.
- (vi) Focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.
- (vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.
- (viii) Promote the more efficient use of land through higher density, mixed use development and the use of suitably located previously developed land and buildings.

Planning should seek actively to bring vacant and underused previously developed land and buildings back into beneficial use to achieve the targets the Government has set for development on previously developed land.

- (ix) Enhance as well as protect biodiversity, natural habitats, the historic environment and landscape and townscape character.
- (x) Address, on the basis of sound science, the causes and impacts of climate change, the management of pollution and natural hazards, the safeguarding of natural resources, and the minimisation of impacts from the management and use of resources.

In relation to design, PPS1 sets out that planning authorities should plan positively for the achievement of high quality and inclusive design. It continues to outline the following:

High quality and inclusive design should be the aim of all those involved in the development process. High quality and inclusive design should create well-mixed and integrated developments which avoid segregation and have well-planned public spaces that bring people together and provide opportunities for physical activity and recreation. It means ensuring a place will function well and add to the overall character and quality of the area, not just for the short term but over the lifetime of the development. This requires carefully planned, high quality buildings and spaces that support the efficient use of resources. Although visual appearance and the architecture of individual buildings are clearly factors in achieving these objectives, securing high quality and inclusive design goes far beyond aesthetic considerations. Good design should:

- Address the connections between people and places by considering the needs of people to access jobs and key services;
- Be integrated into the existing urban form and the natural and built environments;
- Be an integral part of the processes for ensuring successful, safe and inclusive villages, towns and cities;
- Create an environment where everyone can access and benefit from the full range of opportunities available to members of society; and,
- Consider the direct and indirect impacts on the natural environment.

The following is a list of the key national policy documents:

Planning Policy Guidance Notes (PPG)

Planning Policy Guidance 4: Industrial, commercial development and small firms

Planning Policy Guidance 13: Transport

Planning Policy Guidance 15: Planning and the historic environment

Planning Policy Guidance 16: Archaeology and planning

Planning Policy Guidance 16: Planning for open space, sport and recreation

Planning Policy Guidance 24: Planning and noise

Planning Policy Statements (PPS)

Planning Policy Statement 1: Delivering Sustainable Development

Planning Policy Statement 3 Housing

Planning Policy Statement 6: Planning for Town Centres

Planning Policy Statement 9: Biodiversity and Geological Conservation

Planning Policy Statement 10: Planning for Sustainable Waste Management

Planning Policy Statement 11: Regional Spatial Strategies

Planning Policy Statement 12: Local Development Framework

Planning Policy Statement 22: Renewable Energy

Planning Policy Statement 25: Development and Flood Risk

Regional Planning Policy - The London Plan

The London Plan (Spatial Development Strategy for Greater London) 2004 was prepared by the Mayor of London. It only deals with matters of strategic importance in accordance with the Greater London Authority Act 1999.

Key themes

The Mayor of London identifies sustainable development as a key theme driving the policies of the London Plan. In accordance with this, the London Plan supports the following:

- > Optimising the use of previously developed land;
- Using a design led approach to optimise the potential of sites;
- ➤ Ensuring that development occurs in locations that are currently, or are planned to be, accessible by walking, public transport and cycling;
- ➤ Ensuring that development occurs in locations that are accessible to town centres, employment, housing, shops and services.

Town centres

The London Plan identifies a network of town centres which are encouraged to be locations for a full range of functions including retail, leisure, employment services and community facilities. It seeks to sustain and enhance the vitality and viability of town centres though high density, mixed use development and environmental improvement (Policy 2A.5).

The suburbs

The London Plan promotes policies for suburban London, encouraging spatial strategies that promote change and enhance the quality of life of suburban London. In particular, it encourages retail, leisure, key commercial activity and services to be focused on town centres and to promote areas around town centres with good access (public transport, walking) as appropriate for higher density and mixed use development (Policy 2A.6).

Housing

The London Plan has a strong focus on increasing London's supply of housing, with a housing target for each borough being established. The Local Development Framework will need to accommodate the London Plan's housing target and in doing so, will need to carefully manage increased densities whilst balancing the existing valued qualities of the boroughs housing areas. In addition to increasing the overall supply of housing, the London Plan also seeks to increase the supply of affordable housing.

Transport and transport infrastructure

The London Plan encourages the integration of transport and development by encouraging patterns and forms of development that reduce the need to travel (especially by car) and by supporting high trip generating development only at locations with high public transport accessibility and capacity (Policy 3C.1). The London Plan also requires that bus priority measures should be assisted by Local Development Frameworks (Policy 3C.13) and it identifies strategic walking routes, with the Thames Path and the South East London Green Chain crossing Lewisham (Policy 3C.20).

Waste

The London Plan aims to meet National policy in terms of waste being treated or disposed of within the region in which it is produced. In addition to this, requirements for recycling and composting need to be met. To support this the London Plan encourages:

- The safeguarding of existing waste management sites;
- Identification of new sites for waste management;
- Promote waste facilities that have good access to river or rail transport;

The London Plan also encourages the recycling of aggregates, and the development and protection of sites and facilities to support aggregate recycling facilities (Policy 4A.1-4). *Energy and efficient use of water*

The London Plan encourages energy efficiency and renewable energy (Policy 4A.7-13). It encourages:

- > The use of energy assessments in major developments
- The generation of a proportion of major developments electricity and heating needs to come from renewables
- The identification of sites for wind turbines
- Maximising rain harvesting opportunities and using grey water recycling systems.

Design

The London Plan has a collection of policies grouped under the design theme. These include policies on achieving good design within developments but also in the public realm, encouraging sustainable design and construction, and protecting and conserving built heritage. View protection is contained in these policies, with two view lines from Greenwich Park to St Paul's Cathedral crossing Lewisham (Policy 4B.1-17).

The London Plan also encourages maximising the potential of sites in terms of intensity of use, seeking the highest intensity of use compatible with the local context. To advance this the London Plan identifies residential density ranges for different contexts.

The Blue Ribbon Network

The London Plan identifies the Blue Ribbon Network, which includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks. In Lewisham the London Plan identifies the Ravensbourne River as being part of this network. The effect of these policies in the London Plan is to protect the network, ensure the sustainable use of the network, consider flooding risk, protect land

adjoining the network for river related uses, and to consider appropriate design and built form adjoining the network.

The London Plan also encourages the designation by local authorities of a Thames Policy Area, within which detailed appraisals should be prepared to provide a detailed planning framework for the River Thames.

APPENDIX 3 – CORE POLICIES / DEVELOPMENT POLICIES / COMMUNITY STRATEGY RELATIONSHIP

The Spatial (Core) Strategy is the spatial representation of the Community Strategy. The Development Policies provide the detail for the Core Policies. The Community Strategy has 10 key Action Plan areas.

1. Safety

Make Lewisham a safer place and reduce the fear of crime.

2. Health

Sustain and improve the health and wellbeing of local people.

3. Education

Raise educational attainment, skill levels and employability.

4. Enterprise and business growth

Foster enterprise and sustainable business growth including the creative industries.

5. Cultural vitality

Develop cultural vitality by building on Lewisham's distinctive cultures and diversity.

6. Regeneration

Secure the sustainable regeneration of Lewisham – its housing, transport and environment.

7. Welfare dependency

Reduce welfare dependency, promote independence and increase the life chances of vulnerable members of the community.

8. Engage Local Communities

Help local communities to develop the capacity to support themselves, act independently and participate in providing services and wider support to the borough.

9. Equity in service delivery

Design the diversity into local institutions and design out discrimination, ensuring equity in service delivery.

10. Effectiveness, efficiency and sustainability of local public services

Improve the effectiveness, efficiency and sustainability of local public services; optimise investment in infrastructure; and improve the management of assets.

The links between the Spatial (Core) Strategy's Core Policies and the Development Policies to the Community Strategy is shown in Table 3.

Table 3. Links between the Spatial (Core) Strategy Core Policies and the Development Policies to the Community Strategy

Development Policies	Core Policies	Community Strategy Action Plan (AP)
ALL DEVELOPMENT POLICIES APPLY	CP1 Major Growth Corridor	AP 1 Safety AP 2 Health and Well-being AP3 Educational attainment AP4 Enterprise and sustainable business AP 6 Regeneration AP 7 Welfare dependency AP 8 Engage Local Communities
H3, H4,H5, T1, U1, U10, U11, U16, E25	CP2 Lewisham and Catford Town Centres	AP 1 Safety AP 2 Health and Well-being AP3 Educational attainment AP4 Enterprise and sustainable business AP 5 Cultural vitality AP 6 Regeneration AP 7 Welfare dependency
H1, H2, H5, T1	CP3 Forest Hill, Sydenham and Lee Green	AP 2 Health and Well-being AP 4 Enterprise and sustainable business AP 6 Regeneration
H5, HEC3	CP4 Local Areas for Renewal	AP 5 Cultural vitality AP 6 Regeneration AP 7 Welfare dependency
OS1, OS3, OS6, OS8, U1, U13, U16, U17, U18, U19, U20, U21, U22, U23, U26, U27, U28, U29	CP5 Conservation and Protection	AP 2 Health and Well-being AP 3 Educational attainment AP 5 Cultural vitality AP 6 Regeneration AP 7 Welfare dependency
H1, H2, H5, H8, H9, T1, T4, T11, T17, RTC7, SE1, SE2, SE3, SE7, SE13, U1	CP6 Sustainable Development	AP 2 Health and Well-being AP 3 Educational attainment AP 6 Regeneration AP 7 Welfare dependency
SE19	CP7	AP 6 Regeneration

	Ol' t - Ol	
054 055 050 057 0540	Climate Change CP8	AD 4 Cofety
SE4, SE5, SE6, SE7, SE19	Water Management and Flood Risk	AP 1 Safety AP 2 Health and Well-being
		AP 6 Regeneration
SE9, SE12, SE13, SE14, SE15, SE16, SE17, SE18, E2	CP9 Waste	AP 6 Regeneration
SE8, SE9, SE10, SE11, U4, U5, U6, HEC5, HEC6	CP10 Addressing the needs of Lewisham's diverse populations	AP 2 Health and Well-being AP 6 Regeneration AP 8 Engage Local Communities
SE8, SE9, SE10, SE11, U4, U5, U6, U14	CP11 Healthy Lifestyles	AP 1 Safety
		AP 2 Health and Well-being
		AP 5 Cultural vitality
		AP 6 Regeneration AP 7 Welfare dependency
		, ,
HE1, HE2, HEC5, HEC6	CP12 Provision of Health,	AP 1 Safety
	Education and Community Facilities	AP 2 Health and Well-being
		AP 6 Regeneration AP 7 Welfare dependency
		AP 10 Effectiveness, efficiency and
		sustainability of local public services
H1, H3, H4, H5, T2, T3, T4, T7, T9, T10, T11, T12, RTC7	CP13 Planning Obligations	AP 6 Regeneration
17, 13, 110, 111, 112, 1(10)	r larining Obligations	AP 7 Welfare dependency AP 8 Engage Local Communities
SEE IMPLEMENTATION SECTION	CP14 Compulsory Purchase	AP 4 Enterprise and Business Growth
	Powers	AP 6 Regeneration
		AP 8 Engage Local Communities
H1, H2, H3, H4, H5	CP15 Housing Targets	AP 6 Regeneration
H1, H2, H3, H4, H5, U1, U6	CP16 Housing Mix and Location	AP 6 Regeneration
H6, T13, U1, U2, U6, U7, U8, U9, U10, U11	CP 17 Development in	AP 2 Health and Well-being
,,	Context and Density of Development	AP 6 Regeneration
OS3, OS6, U1, U2, U14, U16, U17, U18, U19, U20, U21, U22, U23, U26	CP18 Conservation of the Historic Environment	AP 2 Health and Well-being AP 5 Cultural vitality
T8, OS9, OS7, SE5, U27, U28, U29, U30	CP19 River Thames, Deptford Creek and the Ravensbourne River Network	AP 1 Safety AP 2 Health and Well-being AP 5 Cultural vitality
OS3, U16, U24, U25, U26, U27, U28	CP20 London Panoramas	AP 5 Cultural vitality

	and Charteria Vienna	
OS1, OS2, OS5, OS6, OS7, OS8, OS9 OS10, SE7, SE19, U1, U3, U7, U28, U29	and Strategic Views CP21 The Natural Environment	AP 1 Safety AP 2 Health and Well-being AP 5 Cultural vitality
OS2, OS4, OS5, HEC4	CP22 Deficiency of Open Space	AP 2 Health and Well-being AP 5 Cultural vitality
T1, T2, T3, T6, T7	CP23 Better Public Transport	AP 6 Regeneration AP 10 Effectiveness, efficiency and sustainability of local public services
T1, T2, T5, T7, T8, T9, T10, T13, T15, T17, U11	CP24 Traffic Management and Car Parking	AP 6 Regeneration AP 7 Welfare dependency AP 10 Effectiveness, efficiency and
T1, T6, T11, T14, T16, T17, U28, U29	CP25 Walking and Cycling	sustainability of local public services AP 2 Health and Well-being AP 5 Cultural vitality AP 7 Welfare dependency
U11, E1, E2, E3, E4, E5, E6, E7, E8, E14, E15	CP26 Strategic Employment Locations and Local Employment Locations	AP 4 Enterprise and Business Growth AP 6 Regeneration
U11, E16, E17, E18, E19, E20, E21, E22, E23	CP27 Mixed Use Employment Locations	AP 4 Enterprise and Business Growth AP 6 Regeneration
U11, E24, E25, E26	CP28 Other Employment Sites	AP 4 Enterprise and Business Growth AP 6 Regeneration
U11	CP29 Creative Industries	AP 4 Enterprise and Business Growth AP 5 Cultural vitality AP 6 Regeneration
T1, T11, RTC1, RTC2, RTC3, RTC4, RTC5, RTC6, RTC8, RTC9, U10, U11, U12, U15	CP30 Role, Function and Character of Retail Centres	AP 4 Enterprise and Business Growth AP 5 Cultural vitality AP 6 Regeneration
T1, T3, T11, RTC1, RTC2, RTC8, RTC9, U10, HEC4, E25	CP31 Uses Within the Major and District Town Centres	AP 4 Enterprise and Business Growth AP 5 Cultural vitality AP 6 Regeneration
T1, T3	CP32 Tourism and Tourist Accommodation	AP 4 Enterprise and Business Growth AP 5 Cultural vitality AP 6 Regeneration

APPENDIX 4 - LIST OF DEVELOPMENT POLICIES AND SITE ALLOCATIONS

HOMES FOR ALL (HOUSING)

H1 Housing Mix – Affordable HousingH2 Housing Mix – Market Housing

H3 Affordable Housing: Thresholds and Amount

H4 Affordable Housing: Tenure

H5 Creating Mixed and Balanced Communities

H6 Conversion of Residential PropertyH7 Specialist and Special Needs Housing

H8 Lifetime homes and wheelchair accessible homes

H9 Gypsy and Travellers

TRANSPORT AND PARKING

T1 Location of developmentT2 Development and accessibility

T3 Travel plans

T4 Transport infrastructure

T5 Street hierarchy

T6 New road building and improvements

T7 Traffic management

T8 Freight

T9 Traffic management

T10 Home zones

T11 Car free residential development

T12 Controlled Parking Zones
T13 Car parking standards
T14 Provision for cyclists
T15 Motorcycle parking

T16 Pedestrian routes and access

T17 Transport interchanges

RETAIL AND TOWN CENTRES

RTC1 Principles for Retail Development and other Town Centre Use (Excludes

Lewisham & Catford Town Centres)

RTC2 Types of uses in Core, Non- Core and other shopping Areas (Excludes

Lewisham & Catford Town Centres)

RTC3 Local Shopping Centres and Parades

RTC4 Out-of-centre proposals

RTC5 Cultural Quarters

RTC6 Evening and Night Time Economy

RTC7 Mixed Use Development

RTC8 Sui Generis Use

RTC9 Change of Use of Public Houses

OPEN SPACE AND BIODIVERSITY

• · · · · · · · · · · · · · · · · · · ·	
OS1	Metropolitan Open Land and land adjacent to Metropolitan Open Land
OS2	Public open space and urban green space (Open Environment)
OS3	World Heritage Site Buffer Zone
OS4	Open space deficiencies
OS5	Open space quality and maintenance
OS6	Trees
OS7	Biodiversity
OS8	South East London Green Chain
OS9	River Corridors and the Waterlink Way

OS9 River Corridors and the Waterlink Way
OS10 Green Corridors

SUSTAINABLE ENVIRONMENT

SE1	Energy efficiency for residential development
SE2	Energy efficiency and renewables for major developments
SE3	Stand alone and roof mounted renewable energy
SE4	Flood risk
SE5	River water quality
SE6	Water resources
SE7	Sustainable urban drainage systems (SUDS)
SE8	Air Quality
SE9	Development on Contaminated Land
SE10	Noise and vibration
SE11	Light attenuation
SE12	Construction waste and aggregates
SE13	Construction materials
SE14	Hazardous substances
SE15	Residential Waste Facilities
SE16	Waste Facilities in Commercial and Large Scale Development
SE17	Provision of new Waste management sites
SE18	Protection of existing waste management sites
SE19	Living Roofs for Biodiversity

URBAN DESIGN

U1	Development Sites
U2	Urban Design
U3	Development Sites – Trees, Landscape Planting and Nature Conservation
U4	Designing out Crime
U5	Inclusive Environment
U6	Residential Development - Layout and Amenity
U7	Development on Backland and Infill Sites
U9	Extensions and Alterations to Buildings
U10	Shopfronts
U11	Shop and Building Signs, Advertisements and Poster Hoardings and Other
	Advertisement Displays
U12	Roller Grilles and Shutters
U13	Street Furniture and Paving

U14	Masts, Satellite Dishes and Telecommunications Equipment
U15	Art in Public Places
U16	Tall Buildings
U17	Conservation Areas
U18	New Development, Changes of Use and Alterations to Buildings in
	Conservation Areas
U19	Demolition in Conservation Areas
U20	Preserving Listed Buildings
U21	Listed Buildings – Changes of Use
U22	Locally Listed Buildings
U23	Archaeology
U24	Strategic Views
U25	Important Local Views and Landmarks
U26	Sydenham Ridge Area of Special Character
U27	Thames Policy Area
U28	Thames Path
U29	Thames Foreshore
U30	Deptford Creek and River Ravensbourne Network

HEALTH, EDUCATION AND COMMUNITY FACILITIES

HEC1	Size, nature and location
HEC2	Redevelopment of health, education and community facilities
HEC3	Social and economic impact assessment
HEC4	Provision of Leisure facilities
HEC5	Places of Worship
HEC6	Temporary School Buildings

EMPLOYMENT LAND

E1	Surrey Canal Strategic Employment Location			
E2	Surrey Canal Strategic Sites for Waste Uses, New Waste Uses and			
	Relocation of Waste Uses			
E3	Bromley Road Strategic Employment Location			
E4	General Policy: Local Employment Locations			
E5	Plough Way Local Employment Location			
E6	Evelyn Street Local Employment Location			
E7	Creekside Local Employment Location			
E8	Endwell Road Local Employment Location			
E9	Blackheath Hill Local Employment Location			
	Clyde Vale/Perry Vale Local Employment Location			
	Lewisham Way Local Employment Location			
	Manor Lane Local Employment Location			
	Stanton Square Local Employment Location			
	Willow Way Local Employment Location			
	Worsley Bridge Road Local Employment Location			
E10	Malham Road Locally Defined Employment Area			
E11	Mixed Use Employment Locations			
E12	Arklow Road/Childers Street Mixed Use Employment Location			

E13	Oxestalls Road Mixed Use Employment Location
E14	Plough Way Mixed Use Employment Location
E15	Surrey Canal Road Mixed Use Employment Location
E16	Grinstead Road Mixed Use Employment Location
E17	Convoys Wharf Mixed Use Employment Area
E18	Sun & Kent Wharf Mixed Use Employment Location
E19	Other Employment Sites
E20	Other Employment Sites in Town Centre Locations
E21	Office Development
E22	Local Labour Agreements

SITE ALL	OCATIONS		
1.	16a Algernon Road		
2.	Site at New Cross station Amersham Vale		
3.	New Cross Hospital Site Avonley Road		
4.	Former United Dairies Site, Baring Road		
5.	Land Between Railway Line and Baring Road with Access		
	from Hoser Avenue		
6.	Bell Green Gasworks		
7.	Blackheath Station Car Park		
8.	Sites at Brockley Station, Coulgate Street, Mantle Road, St Norberts Road,		
	Brockley Cross and Endwell Road		
9.	Seager Buildings, Brookmill Road		
10.	Clyde Street SE8		
11.	Former Alfred Morris Day Centre, Clyde Street SE8		
12.	Comet Street, SE8		
13.	Giffin Street, SE8		
14.	Hamilton Street, Deptford SE8		
15.	Octavius Street and Deptford Station, Deptford High Street		
16.	De Frene Road Allotments SE26		
17.	Sites at Forest Hill		
18.	Forest Hill Library, Pools and adjacent open space		
19.	Honor Oak Road Covered Reservoir		
20.	Rear of Christian Fellowship Centre, Honor Oak Road SE23		
21.	Rear of 161-171 New Cross Road		
22.	Site between New Cross Gate Station and 267 New Cross Road, and 17-25		

Kender Estate New Cross Gate

Somerville Adventure Playground, Queens Road

Goodwood Road

23.

24.

25. Sites at Nightingale Grove Hither Green 26. 9 Staplehurst Road and rear of Leahurst Road, Hither Green 27. Tanners Hill O'Rourke Transport/Sivyer Transport Site, 154-160 Sydenham Road 28. 29. 113 - 157 Sydenham Road SE26 30. Rival Envelope Company, Trundleys Road 31. Nature Reserve, corner of Vesta Road and the Brockley to New Cross Gate Railway and 'Scout Hut' corner of Vesta Road and the Brockley to New Cross Gate railway 32. Downham Lifestyles Project

Deptford Creek Opportunity Area

C.

Education sites

33.	Lewis	Lewisham College, Lewisham way			
34.	Sedg	Sedgehill School and sites on Beckenham Hill Road			
35.	Bonu	Bonus Pastor School			
36.	Depti	Deptford Green School			
37.	New School site – Lewisham Bridge School				
	New	New school site option			
	A.	Floating school			
	B.	Florence Road, Deptford			

Evelyn Street, Deptford