

# Lewisham local development framework

## Development Management Local Plan

Adopted 26 November 2014





## Development Management Local Plan - Adoption Version November 2014

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## 1.1 Introduction

- 1.1** The Lewisham Development Management Local Plan (DMLP) sets out the Council's planning policies for managing development in the London Borough of Lewisham and will be used to guide, assess and determine planning applications. The plan supports the implementation of the Lewisham Core Strategy and the London Plan and should be read alongside the Site Allocations Local Plan, the Lewisham Town Centre Local Plan, and any Council supplementary planning documents (SPDs).

## 1.2 What is development management?

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

## 1.3 Local Plan preparation

### Overview

- 1.5** The National Planning Policy Framework (NPPF) came into force in March 2012 and requires the Council to prepare a local plan, which reflects the priorities of their local communities.<sup>(1)</sup>

*A **Local Plan** is 'the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.'*<sup>(2)</sup>

- 1.6** The Council is preparing a number of development plan documents that in combination will comprise the Local Plan for the borough. To signify that a development plan document forms part of the Local Plan, it will be called a Local Plan, e.g. Development Management Local Plan. In time, the completed Local Plan will replace the saved policies contained in the Lewisham Unitary Development Plan (UDP).<sup>(3)</sup> The Council began this process in 2005 and the principal planning document for Lewisham is the Core Strategy, adopted by the Council

1 Paragraph 1, NPPF

2 Glossary, NPPF

3 Adopted July 2004

on 29 June 2011. The Core Strategy sets out the borough's overall planning vision and strategy to manage development and regeneration in the borough for the period 2011 to 2026 as well as strategic policies to guide development proposals.

**1.7** For Lewisham, the Local Plan includes the following documents.

- Core Strategy
- Site Allocations Local Plan
- Lewisham Town Centre Local Plan
- Development Management Local Plan and
- Gypsy and Traveller's Site(s) Local Plan.

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

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

**1.8** The policies put forward are consistent with, and derived from, the following sources:

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

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

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

**1.10** It needs to be recognised that there are certain policy issues that need to be included. In certain instances, evidence has been used to justify a locally distinctive approach for Lewisham.

## How does the DMLP relate to other policy?

**1.11** As explained in more detail below, the DMLP is one of a number of Local Plans for Lewisham. The adopted Local Plans and the published London Plan together form the 'development plan' for the London Borough of Lewisham. Section 38(6) of the Planning and Compulsory Purchase Act 2004 makes clear that determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise.

- 1.12** Government guidance makes clear that a Local Plan should not repeat policies that are in other ‘development plan’ documents. The absence of a policy for a particular topic in the DMLP does not necessarily mean that the topic is unimportant; it may be that there is already a suitable policy in the London Plan, Core Strategy or Lewisham and Catford town centre local plans. The DMLP must therefore be read in conjunction with the other relevant plans and guidance. The complete policy context is shown in Fig. 1 below and key relevant policies that are set out in other plans are sign posted throughout the DMLP.

The DMLP has been prepared having regard to the NPPF, is in general conformity with the London Plan 2011 and helps implement the Lewisham Core Strategy.

- 1.13** Every policy in the DMLP is supported by evidence and has multiple links to other local plans, the London Plan and the NPPF. The following paragraphs provide a simple description of the relevant supporting documents and other plans, while Fig. 1 contains a detailed list of linkages between relevant documents. In accordance with guidance, the DMLP does not repeat policies or guidance that is set out elsewhere, and needs to be read alongside other relevant documents.

### Local Plans

- 1.14** The DMLP is one of a number of adopted and emerging Lewisham Local Plans, listed below, which together will guide future development of the borough:
- Core Strategy
  - Site Allocations Local Plan
  - Lewisham Town Centre Local Plan
  - Development Management Local Plan
  - Gypsy and Traveller’s Site(s) Local Plan.
- 1.15** The Core Strategy was adopted in June 2011 and establishes the borough-wide spatial policy context. The Site Allocations Local Plan was adopted in June 2013 and identifies the locations and sites for specific types of development needed to implement the Core Strategy’s vision (except those sites allocated in the Lewisham Town Centre Local Plan). The Gypsy and Traveller’s Site(s) Local Plan will allocate a site or sites to meet the identified local accommodation needs of Gypsy and Traveller communities in the borough. Local Plans replace the saved policies in the Unitary Development Plan 2004. Additional to these documents are a number of supplementary planning documents which give guidance on detailed issues. Full details can be found on the Council’s website.
- 1.16** The DMLP supersedes saved UDP policies as shown in Appendix 4.
- 1.17** The following table shows how the DMLP has been prepared.

Fig 1	Development Management Local Plan Policy Context
National planning policy	The focus of the Government’s National Planning Policy Framework (NPPF) (March 2012) is on a presumption in favour of sustainable development and positive growth. The NPPF provides a high level planning policy context and sets out the evidence base requirements. The NPPF sets out the government’s planning policies for England and how they are



	<p>expected to be applied. The DMLP is underpinned by the NPPFs 12 core planning principles.</p>
London Plan	<p>The Mayor of London's Spatial Development Strategy (the London Plan), with which all local plans need to be in general conformity, sets out London-wide policies. It is supported by Supplementary Planning Guidance and Best Practice Guidance.</p> <p>The London Plan provides a framework for managing London's growing population. It has important implications for the DMLP as it sets out London-wide policies (including targets) for housing, transport, employment and the environment that need to be reflected at the borough level. The DMLP is 'in general conformity' with the contents of the London Plan.</p>
Sustainable Community Strategy	<p>The Local Plan implements certain aspects of the vision outlined in Lewisham's Sustainable Community Strategy 2008-2020, titled Shaping the Future.<sup>(4)</sup> Lewisham has many other strategies and programmes that influence the use of land in the borough and these were taken into account in the preparation of the DMLP to bring about positive change, particularly for the benefit of the local community.</p>
Lewisham Core Strategy	<p>The Lewisham Core Strategy is the borough's principal planning document and was adopted in June 2011. The DMLP is aligned and implements relevant Core Strategy objectives and policy priorities. Justification for many of the DMLP policies has already been made through the Core Strategy. However, in ensuring a locally distinctive approach, the Council has referred to its extensive evidence base.</p>
Public consultation	<p>In November 2005 the Council undertook consultation on Issues and Options for a suite of local plans, including the (then named) Development Policies and Site Allocations Development Plan Document. Taking account of comments received, the Council then prepared Preferred Options and consulted local people and other stakeholders in June 2007.</p> <p>Following a period when resources were focused on preparing the Lewisham Core Strategy, the Council recommenced preparation on the DMLP in 2012 and consulted on a set of Further Options in December 2012 to January 2013. These Further Options took account of changes that had taken place since June 2007, including changes to the wider policy context. The DMLP takes account of comments made along the way and changes have been made as a result of public involvement. A summary of each round of consultation is set out in the DMLP Consultation Statement.</p>

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

	<p>The DMLP was the subject of consultation with local residents and a wide range of interested local and community groups. This included landowners, developers, government departments and agencies, neighbouring boroughs and other individuals and organisations. In preparing the DMLP the Council has followed the statutory consultation process outlined in its Statement of Community Involvement.</p>
Sustainability appraisal	<p>In line with EU and UK requirements, a sustainability appraisal (SA) (incorporating a Strategic Environmental Assessment) has been undertaken alongside policy preparation. The overall aim is to ensure that the preparation of the DMLP contributes to the achievement of sustainable development. This has involved a separate and concurrent evaluation of the policies, options and reasonable alternatives. The SA highlights the key social, economic and environmental impacts and identifies mitigation and avoidance measures to ensure effective implementation. The SA has contributed towards the reasoning and refinement of policies and is subject to public consultation. The SA is available to view as a separate document.</p>
Equality Analysis Assessment	<p>An Equalities Analysis Assessment (EAA) of the DMLP has been prepared by the Council. An EAA is the process of systematically analysing a proposed or existing policy or strategy to identify what effect, or likely effect, will follow from the implementation of a policy for different groups in the community. Local authorities have a duty under race, disability and gender legislation to carry out an EAA of their Local Plans. The assessment seeks to ensure that, as far as possible, any negative consequences for a particular group or sector of the community are eliminated, minimised or counterbalanced by other measures. The EAA highlights key issues needing further consideration and the recommendations were used in the preparation of the DMLP policies.</p>
Evidence base	<p>The Council has commissioned or prepared a number of studies and reports, several of which support the DMLP policies put forward. Most of this is accessible through the internet or can be viewed at the Council offices. Where necessary, reference is made to the appropriate evidence base documents. A comprehensive list is provided in Appendix 7.</p>

## 1.4 Implementing the Core Strategy

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

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

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

## **1. PROVIDING NEW HOMES**

- 1.20** This section deals with policies that address issues relating to housing. The policies will implement the following Core Strategy strategic objectives and policies.

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

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

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

- 1.22** This is supplemented by the following DMLP policies:

- Prevention of loss of existing housing (DM Policy 2)
- Conversion of a single family house to two or more dwellings (DM Policy 3)
- Conversions of office space and other B use class space into flats (DM Policy 4)
- Specialist accommodation for older people (DM Policy 5)
- Houses in multiple occupation (DM Policy 6)
- Affordable rent (DM Policy 7)
- Student housing (DM Policy 8).

## 2. GROWING THE LOCAL ECONOMY

### 2A. Employment

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

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

**1.23** The Government's objective for the economy is set out in the NPPF. Of relevance to the DMLP is the need:

- for flexible policies to accommodate new economic needs and new business clusters
- to support existing business sectors
- to be flexible enough to accommodate needs not anticipated in the plan
- to allow rapid response to changes in economic circumstances and
- to not allocate or protect employment land that is no longer required for these purposes.

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

**1.25** The DMLP policies provide further detail to ensure:

- the proportion of B Use Classes is maintained in the Mixed Use Employment Locations (DM Policy 9)
- suitable uses and space are provided in the Local Employment Locations (DM Policy 10) and
- suitable uses are retained or replaced for the 'undefined' or other employment locations (DM Policy 11).

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

### 2B. Retail and town centres

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

- Objective 1 by contributing to regeneration and facilitating development

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

**1.27** The Council recognises it has an important role to play in encouraging and sustaining retailing and town centre development. It must provide an adequate framework to enable the retail industry to establish and maintain appropriate town centre services and facilities in a way that meets both the objectives of Government's policy, the needs of retail business and importantly the needs of the local community.

**1.28** The Government's objective for planning in town centres is set out in the NPPF. Planning policies should promote competitive town centre environments and set out a range of policies for the management and growth of centres over the plan period. This includes but is not limited to supporting vitality and viability, promoting competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres.

**1.29** Core Strategy Policy 6 (CSP6) sets out the borough's town centre hierarchy and location of retail development. This is supplemented by the following DMLP policies:

- Hotels (DM Policy 12)
- Location of main town centre uses (DM Policy 13)
- Protecting shopping frontages in District centres shopping frontages (DM Policy 14)
- Protecting a range of essential shops in smaller shopping areas including local parades (DM Policy 15, 16)
- Specific requirements for the location and management of certain town centre uses, such as food and drink outlets, hot food take-away shops, shopfronts and mini cab offices (DM Policy 17, 18, 19, 21)
- Protection of public houses (pubs) (DM Policy 20).

### **3. ENVIRONMENTAL MANAGEMENT**

**1.30** This section deals with policies that address issues relating to climate change and environmental management. The policies will implement the following Core Strategy strategic objectives and policies.

- Objective 5 by creating a low carbon borough and reducing carbon emissions
- Objective 6 by reducing flood risk and improving water quality
- Objective 7 by protecting and capitalising on open spaces and environmental assets
- Objective 11 by strengthening the quality of life and well-being
- Policy 7 Climate change and adapting to the effects
- Policy 8 Sustainable design and construction and energy efficiency
- Policy 9 Improving air quality
- Policy 10 Managing and reducing the risk of flooding
- Policy 11 River and waterways network
- Policy 12 Open space and environmental assets.

**1.31** This is supplemented by the following DMLP policies:

- further guidance on sustainable design and construction issues for domestic and non-residential uses (DM Policy 22)
- Air Quality Management Areas (AQMAS) (DM Policy 23)
- Biodiversity, living roofs and artificial playing pitches (DM Policy 24)
- Landscaping and trees (DM Policy 25)
- Noise and vibration issues (DM Policy 26)

- Lighting design and installation (DM Policy 27)
- Contaminated land (DM Policy 28).

#### 4. BUILDING A SUSTAINABLE COMMUNITY

This section deals with policies that address the issues relating to building a sustainable community.

##### 4A. Sustainable movement and transport

The DMLP policies implement the following Core Strategy strategic objectives and policies:

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

**1.32** The Core Strategy policies provide clear and comprehensive policy for transport issues. The key policy direction is to provide and promote sustainable transport, including public transport, reducing the need to travel particularly by the private car and to improve the walking and cycling environment. This is supplemented by the following DMLP policy:

- Car parking (DM Policy 29).

##### 4B. High quality design for Lewisham

**1.33** This section deals with policies that address issues relating to promoting high quality design. The policies implement the following Core Strategy strategic objectives and policies.

- Objective 1 by contributing to regeneration and facilitating development
- Objective 3 by providing a mix of dwelling sizes and types including family housing, Lifetime Homes and bringing vacant dwellings back into use
- Objective 10 by protecting and enhancing Lewisham's character
- Objective 11 by reducing crime and the fear of crime through innovative design
- Policy 15 High quality design for Lewisham
- Policy 16 Conservation areas, heritage assets and the historic environment.

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

**1.35** The DMLP adds value to a range of policies in the NPPF, the London Plan and the Core Strategy itself. A limited suite of policies deal with more detailed design issues, and the locally prepared evidence base on character areas in Lewisham while reflecting and linking in to the London Plan policies at a more local level.

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

**1.37** The Core Strategy sets out a Regeneration and Growth Area for Lewisham, Catford, New Cross and Deptford that promotes development on a number of large strategic sites. Developers of these sites will need to consider the way the new development on these sites will interact in order to achieve coherence, create new and stimulating developments that contribute to a sense of community, and create new urban quarters. These policies will

provide an appropriate framework for achieving this, but it should be emphasised that all forms of development will be required to provide an appropriate response to the context in which it is located. For example the design of development in town centres should ensure that walking and cycling is supported by the creation of generous public routes and pavements and that connections between the town centres and surrounding residential communities are enhanced. Small residential developments and alterations to buildings should respond to the street context particularly where there are strong unifying design elements. In order to achieve high quality design for significant development proposals early discussions will be encouraged and involve specialist design staff and a design review panel.

**1.38** The DMLP policies include:

- the design of residential environments and dwellings covering:
  - Urban design and local character (DM Policy 30)
  - Alterations and extensions to existing buildings including residential extensions (DM Policy 31)
  - Housing design, layout and space standards (DM Policy 32)
  - Development on infill sites, backland sites, back gardens and amenity areas (DM Policy 33)
- requirements for the Thames Policy Area and Deptford Creekside (DM Policy 34)
- Public realm and street furniture (DM Policy 35)
- conserving the value and significance of Lewisham's historic environment - conservation areas, listed buildings and other non designated heritage assets (DM Policy 36, 37, 38)
- Domestic satellite dishes, masts and telecommunications equipment (DM Policy 39) and
- Public conveniences (DM Policy 40).

#### 4C. Community services

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

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

**1.40** The key policy directions are:

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

**1.41** This is supplemented by the following DMLP policies:

- Innovative community facility provision (DM Policy 41)
- Nurseries and childcare (DM Policy 42)
- Art, culture and entertainment facilities (DM Policy 43) and
- Places of worship (DM Policy 44).



## 1.5 Promoting health and wellbeing

- 1.42** The NPPF presumption in favour of sustainable development highlights the importance of achieving social, economic and environmental objectives, all three of which involve health issues and influence health outcomes. Thirteen sections within the NPPF support the delivery of sustainable development and section 8, entitled *Promoting healthy communities*, focuses specifically on the important role that the planning system can play in facilitating social interaction and creating healthy, inclusive communities (paragraph 69). Local Planning Authorities should create a shared vision with communities of the residential environment they wish to see. Local policies should promote opportunities for meeting through mixed use development, strong neighbourhood centres and active street frontages with safe and accessible environments and developments. A range of social, recreational and cultural facilities and services should be delivered including school places and access to quality open spaces.
- 1.43** NHS London's Healthy Urban Development Unit (HUDU) produced a report and checklist entitled *Watch out for health* (2009) to ensure that health and well-being is properly considered in the planning process. The report details both direct, and wider indirect influences, many of which are already considered and embedded by Lewisham's Core Strategy policies (CSP), and the London Plan as detailed below.
- 1.44** Direct influences include:
- **Housing:** CSP1 Housing provision, mix and affordability, CSP7 Climate change and adapting to the effects, CSP8 Sustainable design and construction and energy efficiency, Residential Standards SPD<sup>(5)</sup> and the London Plan (Chapter 3).
  - **Access to public services:** CSP19 Provision and maintenance of community and recreational facilities and CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
  - **Opportunities for physical activity:** CSP12 Open space and environmental assets, CSP14 Sustainable movement and transport and the Residential Standards SPD.
  - **Air quality, noise and neighbourhood amenity:** CSP7 Climate change and adapting to the effects, CSP8 Sustainable design and construction and energy efficiency, CSP9 Improving air quality, CSP12 Open space and environmental assets, and the London Plan.
  - **Accessibility and transport:** CSP14 Sustainable movement and transport, Residential Standards SPD and the London Plan.
- 1.45** Wider, indirect influences are also discussed and these include:
- **Crime reduction and community safety:** Core Strategy Spatial Policies 1-5, CSP4 Mixed Use Employment Locations , CSP15 High quality design for Lewisham.
  - **Food access:** CSP12 Open space and environmental assets, CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
  - **Access to work:** CSP3 Strategic Industrial Locations and Local Employment Locations, CSP4 Mixed Use Employment Locations, CSP5 Other Employment Locations, CSP20 Delivering educational achievements, healthcare provision and promoting healthy lifestyles.
  - **Social cohesion and social capital:** CSP1 Housing provision, mix and affordability, CSP19 Provision and maintenance of community and recreational facilities.

5 The current Residential Standards SPD will be revised to take account of the policies in this Plan.

- **Resource minimisation:** Core Strategy Spatial Policies 1-5, CSP8 Sustainable design and construction and energy efficiency, CSP15 High quality design for Lewisham.
- **Climate change:** CSP7 Climate change and adapting to the effects, CSP10 Managing and reducing the risk of flooding, CSP12 Open space and environmental assets, CSP14 Sustainable movement and transport.

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

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

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

- DM Policy 1 supports the NPPF presumption in favour of sustainable development. The economic, social and environmental roles all influence health outcomes.
- Housing policies (DM Policies 2 – 8) promote equitable access to quality housing for a range of groups, including students and vulnerable members of the community.
- Retail policies (DM Policies 13 - 17) direct significant development to town centres while also protecting accessible local shops. These policies protect shopping areas as the heart of communities and encourage walking and cycling which supports a reduction car use.
- DM Policy 18 - Hot food take-away shops, limits access to unhealthy foods which can reduce obesity levels and associated health concerns.
- Environmental policies (DM Policies 22, 23, 24, 25, 26, 27 and 28) all contribute to improving Lewisham's living environment and enabling access to natural areas which positively impact on the community's health and wellbeing.
- DM Policy 29 - Car parking, encourages public transport in appropriate locations which can help reduce air pollution and congestion and encourage physical exercise through walking and cycling.
- DM Policy 30, relating to general design and local character, and DM Policy 19, looking at the design of shopfronts, promote an aesthetically appealing Lewisham which can contribute to community wellbeing.
- DM Policy 32, focuses on housing design and space standards and specifically mentions the application of Lifetimes Homes and Wheelchair Housing standards.
- DM Policies 41, 42, 43, and 44 promote access to community facilities and services such as public conveniences, nurseries and childcare, and places of worship, which can contribute to community cohesion and wellbeing.

- 2.1** Section 2 sets out the **development management policies** that supplement those in the Lewisham Core Strategy and the London Plan and will be used to guide, assess and determine relevant planning applications.

## 2.1 Presumption in favour of sustainable development

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

### DM Policy 1

#### Presumption in favour of sustainable development

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

#### Justification

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

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

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

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

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

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

## 2.2 Prevention of loss of existing housing

### What is the aim of this policy?

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

### DM Policy 2

#### Prevention of loss of existing housing

1. The Council will only grant planning permission for the loss of housing by demolition, redevelopment or change of use in the following circumstances:
  - a. the proposed redevelopment would result in housing gain which regenerate and replace older housing estates in line with an agreed plan or strategy
  - b. the land or premises are allocated for another use in an adopted Local Plan
  - c. a change of use to a local community service or facility is proposed that meets an identified need
  - d. an economic viability study confirms that the dwelling(s) cannot be rehabilitated to a satisfactory standard at reasonable cost
  - e. evidence shows that environmental problems are such that demolition and redevelopment is the only effective option.
2. The reconversion of a former single dwelling house with multiple dwellings to a single dwelling may be acceptable in predominantly residential areas suitable for family occupation subject to amenity considerations and DM Policies 30, 31, 32 and 33.

### Justification

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

DM Policy 31 (Alterations and extensions to existing buildings including residential extensions), DM Policy 32 (Housing design, layout and space standards) and DM Policy 33 (Development on infill sites, backland sites, back gardens and amenity areas).

- 2.11** Given the overwhelming need for housing in the borough the loss of residential uses will not normally be acceptable. However, there may be circumstances where such loss is acceptable. A change of use may be permitted where a local need can be demonstrated to provide an essential local community service. The Lewisham Infrastructure Delivery Plan provides an evidence base for the provision of suitable facilities. Proposals will be considered on their merits having regard to the impact on the amenity of residents, car parking and traffic. The Council's approach to community facilities is set out in Core Strategy Policy 19 (Provision and maintenance of community and recreational facilities) and DM Policy 41 (Innovative community facility provision).

## 2.3 Conversion of a single family house to two or more dwellings

### What is the aim of this policy?

- 2.12** The aim of this policy is to appropriately manage the future subdivision of single family houses into self contained flats, in order to ensure that new dwellings provide a high standard of amenity, and to promote and retain housing choice in the borough.
- 2.13** Family housing (single family houses with three or more bedrooms) is seen as a valuable resource which should be retained in order to meet identified housing need and provide housing choice. Single family houses with fewer than three bedrooms should also be retained in order to provide housing choice.

### DM Policy 3

#### Conversion of a single family house to two or more dwellings

1. The Council will refuse planning permission for the conversion of a single family house into flats except where environmental conditions mean that the single family house is not suitable for family accommodation due to any factor listed below:
  - a. adjacent to noise generating or other environmentally unfriendly uses
  - b. lack of external amenity space suitable for family use.
2. Any single family house considered suitable for conversion according to point 1 of this policy will need to have a net internal floorspace greater than 130 sq. m.
3. All conversions must meet the general design requirements and housing standards in DM Policy 25 (Landscaping and trees), DM Policy 29 (Car parking), DM Policy 30 (Urban design and local character), DM Policy 31 (Alterations and extensions to existing buildings including residential extensions) and DM Policy 32 (Housing design, layout and space standards).

### Justification

- 2.14** DM Policy 3 implements Core Strategy Objective 3: Local housing need and Spatial Policy 5 Areas of Stability and Managed Change. These policies deliver the approach in London Plan policy 3.8 which states that Londoners should have 'a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.' DM Policy 3 is intended to provide that choice by ensuring that conversions of single family houses into flats does not further reduce the provision of this type of housing.
- 2.15** DM Policy 3 is also consistent with the NPPF which states that 'To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes) and identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand' (paragraph 50).

- 2.16** The conversion of single family houses into flats will be permitted under the strict circumstances described in the policy. Single family houses in situations unfavourable to family occupation might include properties adjacent to busy roads, houses that lack sufficient external amenity space or other physical conditions that would be individually assessed. However, the Council is concerned that new flats in these dwellings should provide appropriate space standards for the occupiers and considers that a minimum floorspace standard should be retained to ensure that new converted flats provide a good standard of accommodation.
- 2.17** The London Plan Housing Supplementary Planning Guidance November 2012 (SPG) (paragraphs 1.2.12 - 1.2.17) states that since the early 1990s the conversion of houses to smaller flats represented nearly a third of London's Housing Capacity and was especially important in inner London. Since then conversions reduced in importance although they have continued to make a significant net contribution to housing output in appropriate locations. In some neighbourhoods where conversion pressures are particularly acute, proposals may lead to over development, so compromising local residential amenity.
- 2.18** The London Plan SPG also states that a balance has to be struck between realising the potential of residential conversions, especially to meet the needs of smaller households, and sustaining the residential quality of those neighbourhoods where pressure for conversion is particularly intense. Across the capital as a whole, the pan London SHMA identifies a surplus of large houses. Where this is confirmed at local level, the planning system can support their conversion into attractive smaller units, while ensuring proper safeguards for local amenity. The SPG considers that locally restrictive policies should not be applied along transport corridors or within reasonable walking distance of a town centre without robust justification.
- 2.19** The Lewisham Housing Conversions Study 2012 has been prepared to provide evidence for this policy and uses data provided by the Valuation Office (VOA) to identify the potential for the conversion of single family houses in the borough. The data is analysed into small areas called Lower Super Output Areas (LSOAs) which were prepared by the Office for National Statistics to be compact in shape, homogeneous both socially and in relation to the type of dwelling in each area e.g. detached or semi-detached and nature of tenure e.g. owner occupied, privately rented etc. The VOA provided data on the number and type of dwellings in each LSOA and also the number of properties at various floorspace sizes. This was used to assess the potential each LSOA had for the conversion of single family houses into flats at various floorspace thresholds.
- 2.20** The data showed a very wide variation in conversion potential across the borough. Wards such as Bellingham and Downham dominated by former London County Council Estates had very little potential for conversion in any of their LSOAs as the vast majority of dwellings fall below the floorspace threshold of 130 sq.m. net floorspace which was used in the Lewisham UDP (UDP Policy HSG 9 Conversion of residential property). Telegraph Hill Ward showed one LSOA that had the potential for the conversion of 100% of the remaining stock of unconverted single family houses into flats in an area where converted flats already predominate. Evelyn Ward, which is predominantly flatted development, has the potential to lose 20% (10 dwellings) of the remaining unconverted stock of single family houses which would reduce housing choice in the area. Most wards present a more mixed picture but several have the potential for the conversion of large numbers of single family houses which would reduce housing choice in the borough.
- 2.21** The Lewisham Housing Conversions Study 2012 shows that one bedroom flats represented 50% of conversion completions in 2010/11 and 52% of conversion completions in 2009/10. Of the total converted flats provided over the period 16% were three+ bed dwellings usually categorised as family dwellings. With the adoption of dwellings floorspace standards from the London Plan which provide more generous room sizes especially with respect to bedrooms, the provision of larger sized flats might not be possible in the future if the policy



threshold in UDP Policy HSG9 was to be carried forward to the DMLP. The Housing Conversions Study (paragraph. 6.160) also shows that over the past four years, family sized dwellings have represented the minority of new dwellings coming forward with three to six bed dwellings representing an average of approximately 11% of new supply between 2008-2011. The study also shows that in recent housing completions between 2008 and 2011, one and two bed dwellings predominate at, on average, 89% of all completions. The recent history of completions provides a further justification for the retention of single family houses by this policy.

- 2.22** The evidence in the Lewisham SHMA shows that the main need for housing in Lewisham is for family housing which is defined in the London Plan as houses having three or more bedrooms, and that the further conversion of houses into flats should be limited. The Council has ensured through the Strategic Site Allocations in the Core Strategy and the smaller other allocations in the Site Allocations Local Plan and Lewisham Town Centre Local Plan that the projected housing growth for Lewisham can be accommodated without the need for the further conversion of single family houses into flats and the consequent loss of high quality family accommodation.
- 2.23** The Lewisham Housing Conversions Study estimates that the policy would ensure the retention of up to 7,300 single family houses, as compared to what could potentially be granted planning permission by the Lewisham UDP Policy HSG 9 in line with the need for this type of accommodation identified in the Lewisham SHMA. The VOA data shows that 54% of the entire housing stock is already in the form of flats and 18% of the total is in the form of conversions. DM Policy 3 will therefore preserve a choice of the types of dwellings available.
- 2.24** DM Policy 3 allows for the conversion of houses not considered suitable for family occupation. This would be individually assessed in terms of point 1.a and 1.b of the policy. The Council considers that the policy is appropriate and is the most consistent and effective way to prevent the conversion of single family houses suitable for family accommodation that will meet identified housing need.

## 2.4 Conversions of office space and other B Use Class space into flats

### What is the aim of this policy?

- 2.25** The conversion of underused or vacant office and other B Use Class space into self-contained flats can be a good way of providing new residential accommodation and ensuring that this space is well used. Office and storage space above shops will have permitted development rights for the change of use to up to two flats. The policy is intended to provide a framework for the appropriate conversion of office or other B Use Class spaces into residential development.

### DM Policy 4

#### Conversions of office space and other B Use Class space into flats

1. The Council will support the conversion of office space and other B Use Class space into self contained flats in the following circumstances:
  - a. the proposal does not conflict with other policies in relation to employment floorspace (DM Policies 9, 10, 11)
  - b. the proposal meets the standards set out for residential development in DM Policy 32 (Housing design, layout and space standards)
  - c. the proposal achieves a good living environment with adequate access, parking and safety standards, refuse storage and collection arrangements.

### Justification

- 2.26** DM Policy 4 supports the implementation of Core Strategy Spatial Policy 1 (Lewisham Spatial Strategy) and Core Strategy Policy 1 (Housing provision, mix and affordability). This policy is consistent with the NPPF (paragraph 22) which states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.'
- 2.27** The conversion of offices and other B Use Class buildings into self contained flats will be supported in appropriate circumstances as a valuable means of retaining the vitality of shopping centres by ensuring that vacant or underused space is brought back into use. Residential development is a valuable use for B Use Class properties that have become vacant and/or are no longer capable of offering suitable accommodation for these uses.

## 2.5 Specialist accommodation for older people

### What is the aim of this policy?

- 2.28** The aim of this policy is to ensure specialist accommodation for older people is provided in appropriate locations. This form of housing meets a specific housing need, and as the proportion of the population that is aged increases, the Council needs to ensure it can meet demand for this type of housing.

### DM Policy 5

#### Specialist accommodation for older people

1. The Council will support proposals for specialist accommodation for older people including sheltered housing, care homes and other appropriate models of accommodation for the elderly and those with particular needs (referred to hereafter as extra care accommodation) provided that the development:
  - a. is well designed to meet the particular requirements of residents with social, physical, mental and/or health care needs
  - b. will be easily accessible to public transport, shops, local services, community facilities and social networks for residents, carers and their visitors.
2. Where accommodation is provided on a freehold or leasehold basis, the Council will expect the development to supply an appropriate percentage of affordable housing in accordance with Core Strategy Policy 1. In the case of sheltered accommodation and extra care accommodation the Council will encourage a mix of tenures.
3. The Council will resist development that involves the net loss of floorspace in specialist accommodation unless:
  - a. adequate replacement specialist accommodation will be provided
  - b. it can be demonstrated that there is a surplus of that particular type of specialist accommodation in the area, and
  - c. it can be demonstrated that the existing specialist accommodation is incapable of meeting relevant industry standards for suitable accommodation.
4. Where the Council is satisfied that a development involving the loss of specialist accommodation is appropriate, it will expect re-provision of an equivalent amount of floorspace, or of permanent housing in C3 Use Class, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

### Justification

- 2.29** DM Policy 5 sets out criteria for assessing housing proposals for specialist accommodation for older people including sheltered housing, extra care accommodation and care homes, and including its appropriate location. The policy is consistent with the NPPF (paragraph 50) and the London Plan Policy 3.5 (Quality and design of housing developments) and Policy 3.8 (Housing choice).

- 2.30** A key criterion is the need for buildings to be designed so that they are fit for purpose, with a good fit between the facilities supplied and the specialist needs of residents. However, the relationship between a development and its surroundings is also important. Some residents experience a greater degree of independent living than others. In promoting independence, the Council will seek to ensure that residents, carers and visitors have access to the services they need, and have the opportunity to play an active role in the community. Locations with access to existing social networks and facilities is one way of facilitating interaction and can help to prevent isolation. The Council defines accessible locations as those generally located at a distance of not more than 400 metres from the proposed development site and for this distance to be accessible by means of a suitable access pathway and gradient.
- 2.31** There is a market for the letting and sale of some types of specialist accommodation, although the supply in Lewisham is limited at present. The Lewisham SHMA indicated that 17.9% of households in Lewisham were all older people and another 5.5% contained at least one older member of the household alongside younger members.<sup>(6)</sup> The proportion of older households that live in the social rented sector accounts for 44% of all older person households in the borough.<sup>(7)</sup> Around 20% were of older person households likely to consider sheltered housing or a flat in a block specifically built for older people.<sup>(8)</sup>
- 2.32** The ability of older people to access such specialist accommodation varies considerably depending on whether they own their existing housing, have other assets and investments, and whether they have a pension. Therefore, new sheltered housing and extra care accommodation will need to be available at a range of costs and tenures. Where self-contained specialist housing is provided on a freehold or leasehold basis, the Council will seek an appropriate percentage of affordable housing in accordance with Core Strategy Policy 1.
- 2.33** Affordability and the financial support available to older people will also be considerations where care homes are proposed. The Council acknowledges that arrangements for assessing affordability to people of pensionable age will be different from assessing affordability to people of working age, especially when housing costs include an element of care.
- 2.34** Where the Council accepts that an existing site or property is no longer appropriate for specialist accommodation, development for self-contained standard housing will be the preferred option, including the provision of an appropriate proportion of affordable housing. When considering redevelopment for self-contained standard housing, the Council will have regard to the criteria set out in Core Strategy Policy 1, and any need to generate funding for replacement housing for specialist accommodation elsewhere. If replacement housing is provided elsewhere, the Council will consider the proportion of affordable housing provided across both sites. The Council will resist proposals for non-residential development in accordance with DM Policy 2, and will seek to retain existing affordable housing in accordance with Core Strategy Policy 1.

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6 Paragraph 7.28, Lewisham SHMA, Dec 2009

7 Paragraph 7.30, Lewisham SHMA, Dec 2009

8 Paragraph 7.39, Lewisham SHMA, Dec 2009

## 2.6 Houses in multiple occupation

### What is the aim of this policy?

- 2.35** The aim of this policy is to provide controls for Houses in Multiple Occupation (HMO) that fall within the Sui Generis Use Class. A HMO is classified as C4 Use Class and is permitted development if it is a shared dwelling house occupied by between three and six unrelated individuals, and it acts as their only or main residence, where basic amenities such as a kitchen or bathroom are shared. For those dwellings accommodating more than six unrelated individuals, planning permission will be required. Without careful consideration a HMO can lead to the loss of family dwellings and impact on the amenity of surrounding residential dwellings and the wider neighbourhood.

### DM Policy 6

#### Houses in multiple occupation (HMO)

1. The Council will only consider the provision of new Houses in Multiple Occupation where they:
  - a. are located in an area with a public transport accessibility level (PTAL) of 3 or higher
  - b. do not give rise to any significant amenity impact(s) on the surrounding neighbourhood
  - c. do not result in the loss of existing larger housing suitable for family occupation, and
  - d. satisfy the housing space standards outlined in DM Policy 32.
2. The Council will resist the loss of good quality Houses in Multiple Occupation.
3. The self containment of Houses in Multiple Occupation, considered to provide a satisfactory standard of accommodation for those who need shorter term relatively low cost accommodation will not be permitted, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard.

### Justification

- 2.36** Houses in Multiple Occupation (HMO) refers to residential property that takes the form of shared houses, flats and non-self contained dwellings. Planning permission is required for a HMO where there are more than six individuals forming a household who share a kitchen, bathroom or toilet. Households are families, including single persons and co-habiting couples (whether or not of opposite sex). HMOs considered to be Sui Generis will be assessed using DM Policy 6.
- 2.37** DM Policy 6 supports Core Strategy Strategic Objective 3 and Core Strategy Policy 1.
- 2.38** HMOs that are of a good standard provide an important part of the provision of affordable housing in Lewisham, particularly for young people and those with low incomes. For some, the availability of bedsits or lodgings may be the only alternative to homelessness and for this reason the loss of existing good quality HMOs will be resisted.
- 2.39** It is important that the standard of HMO accommodation is of a good quality. This will mean sufficient internal space in accordance with the standards outlined in DM Policy 32 (Housing design, layout and space standards), provision of amenity space for the occupants, and no

significant adverse amenity impacts to the adjacent and/or surrounding residential neighbourhood. Applicants should also ensure that HMOs satisfy the appropriate Environmental Health standards.

- 2.40** The location of a HMO is generally not suitable for the Areas of Stability and Managed Change as shown in the Lewisham Core Strategy (Spatial Policy 5) due to the impact on social and physical infrastructure. These areas are largely residential or suburban in character and public transport accessibility is lower than other areas of the borough.
- 2.41** The Council strongly encourages all new HMOs to provide 10% wheelchair accessible rooms which are fully fitted from occupation, as leases are often short and turnover relatively high within this type of accommodation.

## 2.7 Affordable rented housing

### What is the aim of this policy?

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

### DM Policy 7

#### Affordable rented housing

1. The Council will require new residential development to provide on site affordable housing in accordance with Core Strategy Policy 1.
2. When considering the affordable housing mix, the Council will maximise affordable housing output on a case by case basis by making the best use of available resources and taking account of other relevant factors including viability, the need to address strategic as well as local need and ensuring that homes remain affordable for people on low incomes.
3. When providing affordable rented housing, priority will be given to delivering family homes (3 or more bedrooms).

### Justification

- 2.43** Core Strategy Policy 1 (CSP1) sets out a clear policy on affordable housing for the borough over the plan period. CSP1 requires housing development on qualifying sites (10 or more dwellings) to provide as much affordable housing as is financially viable. The starting point for negotiations is a contribution of 50%. The Core Strategy defines two types of affordable housing: social rented and intermediate housing. The required tenure mix is 70% social rented and 30% intermediate housing.
- 2.44** The Council carried out a number of studies to support its approach and the Core Strategy requirements are based on a balance between meeting the need for more affordable housing and ensuring schemes are viable and can be delivered. Evidence underpinning the Core Strategy looked at housing need and viability, specifically the Lewisham Housing Market Assessment and the Affordable Housing Viability Study. The studies highlight the need for more affordable housing in Lewisham, particularly more social rented housing and also highlight the low average incomes of those in housing need.
- 2.45** Since the Core Strategy was adopted in June 2011 the government has made changes to the definition and delivery of affordable housing. This has now been reflected through the NPPF and these changes have also been included in recent amendments to the London Plan.
- 2.46** A category tenure called 'affordable rented housing' is now included within the NPPF definition of affordable housing. This new tenure is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable rent

is subject to rent controls that require a rent of no more than 80% of the local market rent.<sup>(9)</sup> Tenancy can range from two years to a lifetime, and will be offered by registered providers of social housing through the usual letting and nomination process to new tenants. The introduction of this new tenure was driven by reductions in the availability of capital grant funding and not by the ability of local households to afford the new rent levels.

**2.47** Affordable rent levels wholly set at 80% of market rent would be unaffordable for many of the borough's residents in need of social housing, given their low average incomes. In reality individual affordable rent schemes usually contain homes at a range of rents, including at or around target rent level, so DM Policy 7 does not prescribe rigid rent levels, as these should be set on a case by case basis. Key considerations include:

- addressing the requirement to maximise affordable housing output, whilst taking into account other policies in the Core Strategy,
- meeting the full objectively assessed affordable housing needs,
- ensuring housing provision remains affordable for future eligible households, and
- taking account of the location within the borough, the area's tenure mix and site characteristics.

**2.48** Applicants are required to submit an independent financial viability appraisal, the costs of which should be borne by the applicant. It should address:

- the mix of units available for social rent, affordable rent and intermediate housing,
- the mix of dwelling sizes and types,
- the mix of affordable rent levels,
- how the housing scheme as a whole will remain affordable, and
- that the scheme has been properly costed and is deliverable.

**2.49** The Council will assess the financial viability appraisal and the proposed scheme on a case by case basis.

**2.50** In seeking to maximise affordable housing output, the Council will work with the Mayor of London to make best use of its own resources and those available from his housing investment programme; and take into consideration the Council's housing investment strategy for other schemes that fall outside of the Mayor of London's housing investment programme.



## 2.8 Student housing

### What is the aim of this policy?

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

### DM Policy 8

#### Student housing

1. The Council will support proposals for student housing provided that the development:
  - a. will not involve the loss of permanent self-contained homes
  - b. will not involve the loss of designated employment land
  - c. will not involve the loss of leisure or community space
  - d. will not prejudice the Council's ability to meet its annual London Plan housing target for additional self-contained homes
  - e. has an identified end user affiliated with an educational institution or student housing management company
  - f. is well served by public transport and is accessible to a range of town centre, leisure and community services
  - g. provides a high quality living environment and includes a range of unit sizes and layouts, with and without shared facilities, to meet the requirements of the educational institutions it will serve
  - h. complies with part 1 of DM Policy 6 Houses in multiple occupation (HMO) in all cases where the proposal involves the creation of an HMO
  - i. demonstrates that it is suitable for year round occupation and that it has long term adaptability and sustainability, including adequate and suitable cycle parking
  - j. contributes to creating a mixed and inclusive community
  - k. does not cause unreasonable harm to residential amenity or the surrounding area and
  - l. provides 10% wheelchair accessible rooms fully fitted from occupation.
2. The Council will resist development that involves the net loss of student housing unless:
  - a. adequate replacement accommodation is provided in a location accessible to the higher education institutions that it serves or
  - b. the accommodation is no longer required, and it can be demonstrated that there is no local demand for student accommodation to serve another higher education institution based in Lewisham or adjoining boroughs.

### DM Policy 8

Cont...

3. Where the Council is satisfied that a development involving the loss of student housing is justified, the replacement development is to provide an equivalent amount of residential floorspace for permanent housing in Use Class C3, including an appropriate amount of affordable housing, having regard to Core Strategy Policy 1.

#### Justification

- 2.52** The Council considers student accommodation (purpose built or conversion of existing buildings that are not family housing) a suitable use provided that proposals can meet the criteria outlined above in DM Policy 8.
- 2.53** The Council will ensure that any student accommodation has a positive effect on the surrounding environment and image of the borough. It is important that proposals are of the highest design quality. The Council will protect the borough against the construction of buildings that do not serve their intended purpose and run the risk of dereliction. To prevent such circumstances from occurring, speculative development will not be acceptable and the Council will require applicants to secure a commitment of use by an educational institution or a recognised student housing management company prior to commencing development. The location of the occupying universities will also greatly affect the transport assessment required.
- 2.54** Site management and maintenance is considered key to successful student accommodation and will be secured by way of a Section 106 agreement, which may cover such matters as provision of on-site wardens, use of communal facilities, elimination of potential noise nuisance and security and safety for occupants. Furthermore, developers will be encouraged to provide student accommodation that meets national and local standards, such as Accreditation Network UK (ANUK) accreditation schemes. This is mutually beneficial for both landlord and tenant, with private landlords providing good standards in the condition and management of their properties. This creates quality accommodation and a good supply of privately rented property and in turn encourages students to be responsible tenants and neighbours.
- 2.55** The conversion of existing buildings to student accommodation is particularly sensitive given the requirements to provide a high quality living environment which is not always possible with the conversion of existing buildings not originally designed for that use. In particular, the Council will not approve applications that cause a loss of residential, employment, retail, leisure or community space and would not accept student accommodation which would be unduly compromised by the layout or position of an existing building. Schemes that provide student accommodation in HMOs should be compliant with DM Policy 6.
- 2.56** The Council's housing trajectory will be used to monitor the amount of student housing and ensure that levels do not affect the borough's ability to meet its London Plan housing targets.
- 2.57** Applicants will be required to submit management plans for the student accommodation planned as part of the planning application process.

## 2.9 Mixed use employment locations

### What is the aim of this policy?

**2.58** The aim of this policy is to set out how the mix and proportion of B Use Classes will be maintained in Mixed Use Employment Locations (MELs) in terms of the planning permissions for comprehensive redevelopment granted in these locations in accordance with Core Strategy Policy 4 and relevant Core Strategy Strategic Site Allocations. MELs are sites within the borough, either formerly or in continuing industrial use, which were assessed by the Lewisham Employment Land Study (ELS) as older and poorer quality industrial uses with low employment densities, often incompatible with adjoining residential areas. The Core Strategy requires new developments on these sites to:

- deliver a radical improvement in the physical quality of the urban environment
- to attract further investment where the environment is poor and unemployment and levels of deprivation are high
- to provide a proportion of floorspace within the B Use Class (office, workshops, industry and warehouses and storage).

**2.59** The policy deals with how a development may change over time with applications for changes of use considered in the context of the Core Strategy aims for these sites.

### DM Policy 9

#### Mixed use employment locations (MEL)

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

### Justification

- 2.60** DM Policy 9 supports the implementation of Core Strategy Policy 4 Mixed Use Employment Locations and Core Strategy Strategic Site Allocations 2, 3, 4 and 5. These policies deliver the approach in London Plan Policies 4.1 Developing London's Economy and 4.3 Mixed Use Development and Offices. DM Policy 9 is consistent with the NPPF's (paragraph 14) central principle that all development must be sustainable, and this policy is designed to ensure the future sustainability and deliverability of units in the B Use Class on these locations. The Council will seek to secure the delivery of the non-residential uses on sites and early thought should be given to potential end uses and users.
- 2.61** MELs promote high density mixed use residential/commercial developments. They are central to implementing the Core Strategy aims for the regeneration of the Deptford/New Cross area through improving the quality of the local environment, providing new housing and facilities in a deprived area of the borough. The MELs are also central to the economic strategy for the borough by providing new buildings capable of attracting and accommodating a wide variety of new and established businesses on sites in industrial use which no longer provided a good quality environment for businesses to prosper, poor quality buildings and a low job density. The Council will expect to see a high proportion of smaller business units provided on these sites for growth sectors identified in the ELS such as creative industries, and business support services and food manufacturing in line with the aims in the Core Strategy.
- 2.62** Flexibly specified buildings are considered essential to ensure the long term sustainability of employment uses on these sites. Flexible buildings will allow the reconfiguration of internal space to suit new occupiers with different space requirements and also allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to the requirements of new users. An internal fit out to an appropriate level rather than provision of a 'core' and 'shell' will also be considered necessary to ensure the deliverability and long term sustainability of employment uses in these locations by ensuring that these buildings are attractive to new occupiers. In implementing this policy requirement, the Council, in consultation with the applicant, will give careful consideration to the needs of potential end users for the premises being provided as part of the development, and will take into account all relevant circumstances when assessing the level of fit-out that will need to be provided.
- 2.63** The ELS has identified clusters of industries that represent growth sectors in the local economy. The sites that have received proposals for development to date have not necessarily reached the 20% requirement of built floorspace to be within the B Use Class, but have proposed alternative forms of employment generating use in order to achieve a vibrant and sustainable development that meets the overall aims of the Core Strategy. The ELS provided a strong case for the viability of a requirement for 20% of the floorspace to be within the B Use Class which would support growth sectors in the local economy and would not wish to see the B Use Class elements on these sites diluted further.

## 2.10 Local employment locations

### What is the aim of this policy?

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

### DM Policy 10

#### Local Employment Locations (LEL)

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

### Justification

**2.65** DM Policy 10 supports the implementation of Core Strategy Policy 3 Strategic Industrial Locations and Local Employment Locations, and Core Strategy Spatial Policies 2, 3, 4, and 5. These policies deliver the approach in London Plan Policy 4.4 Managing Industrial Land and Premises. The policy is consistent with the NPPF (paragraph 21) which states that local planning authorities should 'support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area.'

- 2.66** The Lewisham Employment Land Study (ELS) supports the provision of the types of buildings offered by LELs which provide business units capable of being used by a wide variety of firms in growth sectors of the economy including small and medium enterprises (SMEs). These can typically range between 100 and 250 square metres in size.
- 2.67** The ELS also considers that business units should be flexibly specified to be able to meet the needs of a wide range of businesses. The built format of larger scale warehousing units or self storage facilities often do not provide flexible reuse and provide limited employment opportunities, although it is acknowledged that self storage facilities may provide valuable storage space for smaller mail order businesses and town centre businesses. However, the Council does not wish these larger scale storage uses to predominate on what is, in Lewisham, a very limited supply of business land supporting a small local economy with few locally provided jobs. LELs typically supply relatively good quality premises for small businesses which are in demand in Lewisham and which should be re-supplied in any new development. The LELs should therefore be managed to support a variety of business uses that can respond to and take advantage of Lewisham's location close to wider London markets. The Council may apply conditions on planning permissions to ensure the maintenance of employment space.
- 2.68** Changes of uses outside the B Use class will not be considered on LELs. As noted above most of the LELs are within walking distance of local shopping centres and public transport facilities. It should not be necessary to provide facilities such as day care nurseries or cafés on these sites to support their functioning. Churches and community facilities are considered incompatible with business and commercial functioning on these sites which are largely in workshop and storage uses with large numbers of vehicle movements in open servicing areas.
- 2.69** Flexibly specified buildings are considered essential to ensure the long term sustainability of employment uses on these sites. Flexible buildings will allow the reconfiguration of internal space to suit new occupiers with different space requirements and also allow the retention of existing businesses occupying the premises to expand in situ. This could also include, for example, full height delivery doors, and being able to site additional delivery doors to enable subdivision of buildings and/or reallocation of space to meet the requirements of new users.
- 2.70** The NPPF (paragraph 17) has a central principle that all development must be sustainable. Councils should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.' A full internal fit out for particular schemes could include the installation of sanitary and kitchen facilities, power points and IT connections (broadband), wall and ceiling finishes and plumbing/heating and related works. A finished unit comprising of a 'shell' and 'core' only will not be acceptable as it will not be considered deliverable or sustainable in the long term by being unattractive to potential occupiers. In some cases, where larger speculative industrial or warehousing buildings are being delivered a fit out to this level might not be appropriate. See also DM Policy 22. In implementing this policy the Council, in consultation with the applicant, will give careful consideration to the needs of potential end users for the premises being provided as part of the development, and will take into account all relevant circumstances when assessing the level of fit-out that will need to be provided.
- 2.71** The NPPF (paragraph 22) states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.' The London Plan Policy 4.4 (Managing Industrial Land and Premises) sets out criteria

whereby the boroughs stock of industrial land should be managed including 'the need to identify and protect locally significant industrial sites where justified by evidence of demand.' The Council considers that the LELs represent good quality industrial land currently in active use that is in short supply in Lewisham.

## 2.11 Other employment locations

### What is the aim of this policy?

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

### DM Policy 11

#### Other employment locations

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

1. The Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres, and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses, and where the use is compatible with the surrounding built context. A number of site characteristics and factors will be taken into account when reaching this assessment. This will include whether sites:
  - a. are well located in relation to the highway network
  - b. are well located in relation to town centres and public transport
  - c. offer the potential for the expansion of existing in-situ businesses
  - d. offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area or
  - e. provide lower cost accommodation suitable for small, start-up businesses.
  
2. Redevelopment of a site on a commercial street frontage will be supported when the site or building is redeveloped to a high standard of environmental and design quality in line with the other policies in this plan, where a business use is retained on the ground floor, and a business and/or residential development is provided on upper floors (where an appropriate standard of amenity can be achieved). Uses not within the B Use class, such as retail, leisure, or other uses appropriate to a town centre or local hub will be considered as part of a mix of uses where the number of jobs created by the proposal outweighs the loss of an employment site, and results in no net loss of jobs.
  
3. Where uses are proposed for a site or building in employment or retail use that do not involve any job creation or retention, the Council will require evidence that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.



## DM Policy 11

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### Sites in residential areas

4. Applications for redevelopment for change to other business uses suitable for a residential area will be approved where:
  - a. the site has become vacant for an appropriate length of time and evidence is provided that it is no longer suitable and viable for its existing or an alternative business use by reason of access difficulties or environmental incompatibility, and
  - b. that a suitable period of active marketing of the site for re-use/redevelopment for business uses through a commercial agent, that reflects the market value has been undertaken.
5. A mix of uses in a new scheme will be considered positively subject to the context of the site and meeting the requirements of other policies in this plan, including, in the case of any residential development proposed as part of a scheme an appropriate level of amenity and the suitability of the site for this use.

### All sites

6. The Council will seek contributions to training and/or local employment schemes where there is loss of local employment as a result of redevelopment or change of use.
7. New build business and retail premises should be provided with an internal fit out to an appropriate standard to attract new occupiers and ensure long term sustainable development, and provide a proportion of lower cost accommodation suitable for start-up businesses.

## Justification

- 2.73** DM Policy 11 implements Core Strategy Policy 5 Other employment locations and Core Strategy Spatial Policies 2, 3 and 4. It is consistent with the London Plan SPG 'Land for Industry and Transport' 2012. The policy is consistent with the NPPF (paragraph 22) which states that 'Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'
- 2.74** Many of these smaller sites provide a valuable resource supporting local services and the vitality and viability of the local economy. Town Centres and other commercial and retail areas provide a variety of local services that are complementary to and support retail uses. A sustainable future for the borough will require the retention of these businesses and local services to reduce the need for local residents to travel and to supply local job opportunities. The Council will also support the provision of new business premises.

- 2.75** Extensive marketing evidence that a business use is no longer viable on a site or building that meets the criteria in clause 1 of the policy will be required. The London Plan SPG 'Land for Industry and Transport' (September 2012) considers that the time period for this should normally be for at least two years and up to five years in areas of strong demand for particular types of premises. The Council supports this approach. These timescales are indicative and will be applied flexibly according to the merits of each case. In particular, shorter timescales (up to one year) may be appropriate for B1(a) offices in centres where there is strong demand. The ELS identified a demand within Lewisham for good quality premises suitable for a variety of SMEs. The Council is also concerned that in areas of high demand for residential development, this will be in competition with B Uses vital to sustaining the local economy.
- 2.76** The Council will assess whether the marketing required by the policy has been appropriate and will require documentary evidence that the terms on which the premises were offered were in line with prevailing market conditions for new occupiers in the B Use Class. The Council will assess whether a building or site has been maintained to an appropriate standard to attract new occupiers, and will not consider marketing evidence to be valid in the absence of an appropriate level of maintenance where this would be reasonably provided. The Council will meet and exceed housing targets through sites identified in the Core Strategy, and does not require the release of good quality industrial land and buildings to assist in this. These marketing requirements will not apply to sites and buildings that have become derelict and are not capable of reasonable occupation, in order to ensure the early redevelopment of sites in this condition, in line with the above policy.
- 2.77** Core Strategy Spatial Policy 5 covers the residential areas of the borough and envisages that these areas will be supported by a network of local services and facilities. These are identified in the policy. Other business sites not identified in the policy may have site specific environmental problems, particularly backland sites embedded in residential areas, and in line with the Core Strategy Spatial Policy which supports the provision of quality living environments, residential uses would be supported. Other sites might still have the capacity to contribute to the network of services and facilities as well as recreating or repairing a street scene. Mixed use development will be sought in these circumstances. In the case of complete loss of employment sites of whatever type, S106 contributions to local employment or training initiatives will be sought.
- 2.78** The policy seeks to achieve a balance by retaining the best of these buildings in appropriate locations, or seeking their replacement by mixed use development which will both contribute to the local economy and contribute to housing provision thereby achieving sustainable development. In particular the Lewisham Employment Land Study 2008 (ELS) identified clusters of creative industries, and growth sectors in food and business services which may be able to use these buildings.
- 2.79** The London Plan Supplementary Planning Guidance Document Land for Industry and Transport (September 2012) paragraph 4.9 states that 'other industrial' sites combined with Locally Significant Industrial Sites (in the Lewisham Core Strategy these are called Local Employment Locations) provided 50% of industrial land in 2010 and cumulatively are of strategic importance in meeting London's industrial requirements and, if surplus to demand, in meeting other land use needs. The SPG provides criteria that may be adopted in Local Plan policies to manage these smaller sites. These are based on general economic and land-use factors and indicators of industrial demand.
- 2.80** The ELS identifies a mis-match between the types of premises in the borough and the demand for new modern quality premises for SMEs.

- 2.81** An internal fit out for particular schemes could include the installation of sanitary and kitchen facilities, power points and IT connections (broadband), wall and ceiling finishes and plumbing/heating and related works. Provision of 'core' and 'shell' only for new buildings will not be considered to support or attract occupation by businesses and will not be considered to provide a sustainable contribution to the economy of Lewisham. This requirement is to ensure the attractiveness, deliverability and marketability of the units and to ensure the future sustainability of new developments. The Council will seek to secure the delivery of the non-residential uses on sites and early thought should be given to potential end uses and users. In implementing this policy requirement the Council, in consultation with the applicant, will give careful consideration to the needs of potential end users for the premises being provided as part of the development, and will take into account all relevant circumstances when assessing the level of fit-out to be provided.
- 2.82** Live work units are self contained small business units designed so that a proportion of the accommodation is capable of being used for residential purposes on a permanent or semi-permanent basis. These uses have been successful in ensuring continued use of some older warehouse/workshop buildings for example in Havelock Walk in Forest Hill. In many cases particularly in new build developments, they have been less successful in generating employment uses. Where these uses are proposed evidence will be required as to the sustainability of employment uses that could be generated by the development.

### 2.12 Hotels

#### What is the aim of this policy?

- 2.83** The aim of this policy is to ensure that new hotels are designed to a high standard, to be accessible, and to ensure that they are appropriately located in relation to public transport.

#### DM Policy 12

##### Hotels

1. The Council will encourage the provision of hotels in appropriate locations, with a preference given to those in highly accessible sections of town centres, in close proximity to train stations or other locations where there is good public transport access.
2. The Council will support proposals for new hotels provided that the development:
  - a. is of the highest design quality, is sympathetic to its surroundings and heritage and enhances the image of the area
  - b. contains ground floor uses that will ensure active frontages and where appropriate add to the vitality of the area throughout the day and evening
  - c. seeks to improve the range and quality of accommodation available within the borough
  - d. meets the highest standards of accessibility and inclusion, and demonstrates that at least 10% of the hotel bedrooms will be wheelchair accessible
  - e. provides a level of car parking appropriate for the site's level of public transport accessibility. Parking provision for developments in areas of good public transport accessibility (PTAL 4 and above) should be limited to disabled parking, coach parking, taxi parking and other parking required for operational need including deliveries and servicing, provided this does not result in an adverse impact on the local highway network
  - f. is able to facilitate coach and/or taxi drop off and collection, either on or off site, in a manner that respects the surrounding character and is without detriment to the safety of other vehicle users, pedestrians and cyclists
  - g. maximises pedestrian linkages and demonstrates opportunities for walking, cycling and sustainable travel
  - h. demonstrates that it plans for long term adaptability and sustainability.
3. The Council will consider the conversion of other use classes (except C3 Residential) into hotels provided that the existing buildings can be suitably converted to accommodate hotel rooms and a range of ancillary hotel facilities and it does not conflict with other policies in the plan.

#### Justification

- 2.84** Lewisham currently has few hotels and the borough has a small tourism sector. However, the Docklands Light Railway and mainline rail stations mean that the borough is within easy travelling distance of Central London and a number of high profile tourist attractions on the periphery of the borough. This provides the opportunity to encourage more tourists to use the borough as a base for exploring attractions elsewhere. New hotel developments will help to cater for both business and leisure needs and help to stimulate the local economy. Hotels provide local employment, with an increase in the number and variety of local jobs and an

increased market for local businesses through both employees and visitors. Hotel guests may also provide a boost to the evening economy, especially where there is ease of access between the hotel and the town centre. The Council therefore is supportive of the development of hotels, or a cluster of hotels, within the borough.

- 2.85** Given the nature of hotels and the need to minimise car borne transport, the location of a proposed hotel will be an important consideration. Not all locations across the borough may be suitable for hotel development. The preferred location for hotels is in highly accessible parts of town centres and other locations where it will encourage public transport usage and reduce the need to travel by car. Proposals for hotels outside of town centres will need to demonstrate that the hotel cannot be located more centrally within town centres or other sustainable locations within high PTAL areas. Smaller scale hotels that do not generate the need for significant car borne journeys may be suitable close to neighbourhood centres or other high PTAL locations across the borough but will need to demonstrate viability. All proposals will need to demonstrate that car parking has been kept to a minimum, that provision is made for cyclists and that good pedestrian links have been created. A travel plan will be required, setting out the effect of car movements and car parking and how sustainable travel options have been incorporated into the development.
- 2.86** There will be a need for hotels to be designed to a high quality from the outset, reflecting the local distinctiveness and townscape, and taking into account the existing and emerging surrounding built, heritage and natural environment. Particular attention will be given to the quality of the materials so as to create a positive effect on the image of the borough. High quality design will need to be demonstrated in the planning application and followed through into the final construction of the hotel. Visitor accommodation should also promote high quality design so that the hotel may be accredited by the National Quality Assurance Scheme. The London Plan (Policy 4.5) requires that 10% of hotel bedrooms are wheelchair accessible.
- 2.87** Many hotels include uses on the ground floor of the hotel that only open for a couple of hours each day, leaving the frontage vacant and inactive for much of the day. Proposals that incorporate a range of day time uses will be considered favourably. Such uses may include hotel receptions, cafés and restaurants, conference facilities, salons and other ancillary supporting space that can be made available for use by the local community as well as visitors staying at the hotel.
- 2.88** With a general shortage of medium priced bedspace, there is a need for a range of visitor accommodation, including good quality budget category hotels. Hence, proposals that do not improve the range and quality of the existing hotel offer will be resisted. Proposals will also need to demonstrate that the hotel is both sustainable and deliverable. Through the Green Tourism for London programme, hotels should seek to reduce carbon dioxide emissions, water use and waste generation. Speculative development will not be acceptable as the bespoke nature and requirements of hotel operators may result in the construction of hotels that do not serve their intended purpose and run the risk of dereliction. Proposals for hotels will need to demonstrate that a hotel operator will be identified and secured prior to the commencement of the development.

### 2.13 Location of main town centre uses

#### What is the aim of this policy?

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

#### DM Policy 13

##### Location of main town centre uses

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

#### Justification

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

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

## 2.14 District centres primary and secondary frontages

### What is the aim of this policy?

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

### DM Policy 14

#### District centres shopping frontages

1. Within the primary shopping frontages of the Blackheath, Deptford, Downham, Forest Hill, Lee Green and Sydenham district centres (as shown on the Policies Map), the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would meet all of the following criteria:
  - a. not harm the predominant retail character of the shopping frontage
  - b. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together, and maintain 70% of A1 uses in the primary shopping frontage
  - c. generate a significant number of pedestrian visits, thereby avoiding the creation of an area of relative inactivity in the shopping frontage
  - d. occupy a vacant unit, having regard to both their number within the district centre as a whole and the primary frontage and the length of time the unit has been vacant
  - e. not result in adverse effects caused by crime, disorder and anti-social behaviour.
  
2. Within the secondary shopping frontages of Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross/New Cross Gate and Sydenham district town centres (as shown on the Policies Map) the Council will only consider a change of use involving the loss at ground floor level of shops (Class A1) where the proposal would meet all of the following criteria:
  - a. introduce an A2, A3, A4 or D2 use
  - b. not harm the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
  - c. not create an over-concentration of non-retail uses so as to create a break in the retail frontage of 3 or more non-A1 uses together
  - d. not harm the retail character, attractiveness, vitality and viability of the centre including unreasonably reducing the percentage of A1 units
  - e. retain an appearance which is compatible with adjoining shop units including window presentation
  - f. provide an active frontage at ground floor level



## DM Policy 14

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

### Justification

- 2.95** The NPPF directs local authorities to define the primary and secondary frontages within centres and set policies that make it clear which uses will be permitted in the primary and secondary frontages. Core Strategy Policy 6 refers to the frontage designations to ensure essential services are maintained and contribute to the vitality and viability of the centres.
- 2.96** A review of the extent of the primary and secondary frontages was undertaken and reported in the Supplementary Report to Lewisham's Retail Capacity Study 2009 (September 2010) and a number of recommendations were made which are now reflected on the Policies Map.
- 2.97** While a wide range of uses are located in the district centres, their primary function is shopping and this should remain the principle land use. In seeking to retain the retail function the Council will strongly resist proposals for a change of use from A1 retail to another use. Uses other than A1 retail will only be considered where the predominant retail character is not unduly harmed.
- 2.98** The Council recognises that in order for town centres to be successful and competitive they must provide customer choice and a diverse retail offer. While it is important that a critical mass of retail uses are maintained within the primary shopping area, a more flexible approach is taken within the secondary shopping frontages where a range of other town centre uses may be appropriate. In particular, restaurants, cinemas, businesses, community uses, banks, policing facilities, building societies, employment centres, advice centres and other health and welfare services may be appropriate.
- 2.99** To help maintain the predominant retail character and vitality and viability of the primary shopping area, the Council will seek to achieve a target of 70% A1 retail uses in the primary frontages of the district centres. The Council's 2012 district centre retail survey showed a range from 39% to 75% for the number of A1 uses in the primary frontages. In order to protect and promote the primary retail function of the centres the Council considers a target of 70% is appropriate. While the percentage of A1 uses in some centres is currently below 70%, as a target it is not considered unrealistic and if achieved would help support a healthy district centre.

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

## 2.15 Neighbourhood local centres

### What is the aim of this policy?

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

### DM Policy 15

#### Neighbourhood local centres

1. Within the designated neighbourhood local centres of Brockley Cross, Crofton Park, Downham Way, Grove Park and Lewisham Way, the Council will require the retention of Class A1 shops, to support the provision of essential daily goods and services, and ensure a range of uses consistent with the local character to contribute to its vitality and viability for shoppers.
2. A change of use to non-A1 uses will only be considered if the following criteria are satisfied:
  - a. a high standard of design and appropriate layout is achieved, including high quality shopfronts, in accordance with DM Policy 19
  - b. provision of an attractive window display
  - c. reasonable attempts have been made to market vacant shop units, for more than 12 months, at an appropriate rent
  - d. the availability of similar alternative shopping facilities within a comfortable walking distance (approximately 400 metres or less)
  - e. a balance to the number and type of units within the centre (where 40% of A1 uses are maintained)
  - f. there is no harm to the amenity of adjoining properties, including that created by noise, smell, litter, and incompatible opening hours (all of which may be controlled by appropriate conditions)
  - g. there is provision of adequate delivery arrangements and no adverse effects arising from traffic generation
  - h. that adequate provision for access for people with disabilities is made, and
  - i. the use would not result in adverse effects caused by crime, disorder and anti-social behaviour.
3. A change of use to residential at ground floor will only be permitted:
  - a. at the end of a row of a retail parade, but not in corner shops, in order to preserve the continuity of retail frontage, and
  - b. where the design and materials of the residential frontage is of the highest quality and relate well to the proportion, scale and detailing of the entire host building, adjoining buildings and make a positive contribution to the streetscape.

### Justification

- 2.104** Neighbourhood local centres complement Lewisham's larger town centres and play an important role in providing an adequate range of local shops to meet the day-to-day needs of residents across the borough. These centres provide locally accessible facilities that are particularly important for the elderly, people with mobility difficulties and those who can not easily reach the larger centres.
- 2.105** In accordance with London Plan Policy 4.8 (Supporting a Diverse and Successful Retail Sector) and Core Strategy Policy 6, the Council will seek to retain accessible retail uses in neighbourhood local centres and will only consider a change of use where marketing evidence shows that there is no economic prospect of such uses continuing. The Council realises the value in the role of the neighbourhood local centres as accessible locations providing for the daily needs of residents. Therefore proposals for the change of use of an existing retail unit must show that there are other essential daily goods and services within a short walking distance.
- 2.106** In considering whether there is adequate provision of alternative shopping facilities within walking distance, the Council will consider whether the shops provide for the everyday needs of residents, including the provision of convenience stores, chemists, post offices, news agents, dry cleaners, hairdressers and laundrettes.
- 2.107** The Council will always seek to maintain a balance of uses within a parade as certain types of uses (such as hot food take-aways (A5 Use Class) and betting shops) can cause detrimental impacts as a result of their location or concentration. The Council will resist proposals that would result in an unacceptable concentration of such uses in one area, detrimentally affect amenity, or result in adverse effects arising from crime, disorder or anti-social behaviour.
- 2.108** The Council's 2012 neighbourhood local centre survey showed a range in the number of A1 units in each centre (from 33% to 44%) and an average of 37% A1 uses. In order to protect the provision of local shops, particularly the provision of essential daily goods, the Council will always seek to maintain 40% of A1 uses. While the percentage of A1 uses in some centres is currently below 40%, as a target it is not considered unrealistic and, if achieved, would help support a healthy district centre.
- 2.109** A number of local shops have been converted to residential in recent years. Where these changes occur in the middle of the parade, the result is a fragmented shopping strip. To avoid this, the Council will seek to reduce the interruption by directing residential conversions to the ends of the shopping parade, but not to corner shop units, regardless of whether there are existing breaks mid-parade. Corner shop units often make an important contribution to the local streetscape through their character and design, even when they exist in isolation, and should be retained.
- 2.110** A change of use to residential at ground floor will only be permitted where the design and quality of the frontages is of the highest quality, refers to the architecture of the host building and neighbouring units, and reflects the general scale and pattern of frontage widths in the area. New frontages should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character and attractiveness of the centre it is located in. The detailing, quality of materials, execution and finishes are very important in the design of frontages as they are viewed close-up. A high standard of amenity for occupants should be achieved.

## 2.16 Local shopping parades and corner shops

### What is the aim of this policy?

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

### DM Policy 16

#### Local shopping parades and corner shops

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

### Justification

- 2.112** There are over 80 local shopping parades within the borough and they vary in size and the range of shops available. The main function of local shopping parades is providing for the daily needs of local residents and the Council seeks to protect this function.
- 2.113** The Council will always seek to maintain a balance of uses within a parade as certain types of uses (particularly hot food take-aways (A5 Use Class) and betting shops) can cause detrimental impacts as a result of their location or concentration. The Council will resist proposals that would result in an unacceptable concentration of such uses in one area, cause disturbance or detrimentally affect amenity.
- 2.114** Marketing evidence will be required for proposals to change the use of existing retail units. The applicant is required to demonstrate that similar alternative shops are within walking distance, there is a healthy mix of uses existing within the parade, and that the amenity of adjoining properties is not adversely affected.

- 2.115** A number of local shops have been converted to residential in recent years. Where these changes occur in the middle of the parade, the result is a fragmented shopping strip. To avoid this, the Council will seek to reduce the interruption by directing residential conversions to the ends of the shopping parade, but not to corner shop units, regardless of whether there are existing breaks mid-parade. Corner shop units often make an important contribution to the local streetscape through their character and design, even when they exist in isolation, and should be retained.
- 2.116** A change of use to residential at ground floor will only be permitted where the design and quality of the frontages is of the highest quality, refers to the architecture of the host building and neighbouring units, and reflects the general scale and pattern of frontage widths in the area. New frontages should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character and attractiveness of the centre it is located in. The detailing, quality of materials, execution and finishes are very important in the design of frontages as they are viewed close-up. A high standard of amenity for occupants should be achieved.

## 2.17 Restaurants and cafes

### What is the aim of this policy?

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

### DM Policy 17

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

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

### Justification

- 2.118** The Council acknowledges the important role that food and drink shops play in contributing to the vibrancy and vitality of town centres, particularly to the night time economy. However, it is also acknowledged that these uses can create negative impacts for nearby residents. Where new food and drink premises are established, the Council seeks to control and minimise these impacts.
- 2.119** The London Plan (Policy 4.6) encourages boroughs to influence the night time economy, particularly in relation to the use classes, time of operation, size of premises and proportion of retail frontage. Lewisham's Core Strategy (Policy 6) further details that secondary frontages in particular will help provide for uses that are appropriate to the night time economy. This policy should be read in conjunction with DM Policies 14, 15 and 16 which relate to the retention of shops (A1 uses).

- 2.120** The sale of food and drink in restaurants and cafés (A3 uses) should primarily be for consumption on the premises. Applicants should consider and provide details of the points contained within part 2 (a-d) of the policy, and including details of any proposed ancillary uses. Ancillary uses may be appropriate unless specifically excluded by condition.
- 2.121** This policy seeks to manage potential negative impacts, particularly in relation to noise, smell and litter, as well as impacts on the road network. Applicants will be expected to provide details of how these impacts will be managed, along with the proposed opening hours.



## 2.18 Hot food take-away

### What is the aim of this policy?

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

### DM Policy 18

#### Hot food take-away shops (A5 uses)

1. The Council will not grant planning permission for new hot food take-away shops that fall within 400 metres of the boundary of a primary or secondary school (the exclusion zone).
2. The Council will only consider granting planning permission for new hot food take-away shops outside of the exclusion zone where:
  - a. the percentage of hot food take-away shops in Major and District Centres does not exceed 5% and in Local Centres does not exceed 10%
  - b. the number of hot food take-away shops in Local Parades of nineteen units or less does not exceed one hot food take-away shop
  - c. the number of hot food take-away shops in Local Parades of twenty or more units does not exceed two hot food take-away shops
  - d. the location and design is acceptable and the proposed use does not detrimentally affect the vitality of the shopping area (in accordance with DM Policy 19 - Shopfronts)
  - e. there is no harm or loss of amenity to the living conditions of nearby residents, including that created by noise and disturbance from other users and their vehicles, smell, litter and unneighbourly opening hours and
  - f. parking and traffic generation is not a danger to other road users, public transport operators or pedestrians.
3. In addition, applicants will be expected to provide acceptable arrangements for:
  - a. the efficient and hygienic discharge of fumes and smells, including the siting of ducts, which should be unobtrusive
  - b. the collection, storage and disposal of bulk refuse and customer litter
  - c. sound proofing, especially if living accommodation is above or adjacent and
  - d. other appropriate mitigation measures in relation to the impact on neighbours of the proposed opening hours.

### Justification

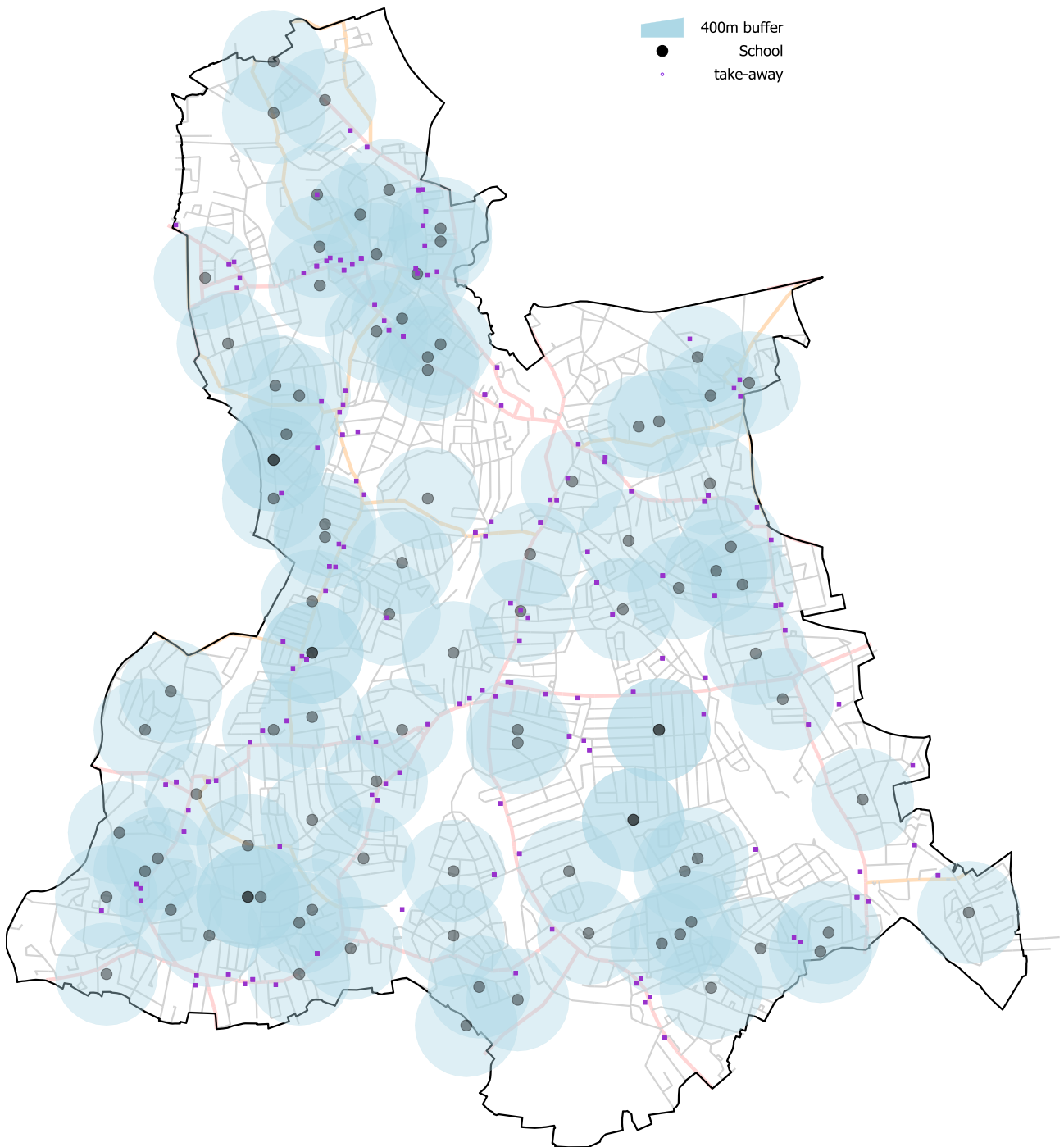
- 2.123** England has one of the highest rates of obesity in Europe and in the developed world. The Department of Health (Healthy Lives, Healthy People, 2010) acknowledges that overweight and obesity is one of the most widespread threats to health and wellbeing in the country and that there is a link between excess body weight and diseases such as type 2 diabetes, cancer and heart disease.
- 2.124** The Foresight report Tackling Obesities: Future Choices (2007) states that diet is one of the key determinants of obesity levels and hot food take-aways are a source of cheap, energy-dense and nutrient-poor food. This means they tend to be high in fat and sugar but low in vitamins and nutrients. Increasing access to healthy foods while also limiting access to unhealthy foods are ways that local authorities can influence environmental factors that affect health and wellbeing. The Department of Health also highlights the importance of the use of planning powers in shaping the built environment and acknowledges that the planning system can be used to limit the growth of take-away shops.
- 2.125** The NPPF requires local authorities to promote healthy communities, use evidence to assess health and wellbeing needs and work with public health leads and organisations. Paragraph 69 acknowledges the important role that planning can play in facilitating social interaction and creating healthy, inclusive communities.
- 2.126** The London Plan (Policy 3.2) directs boroughs to promote the health and well-being of communities and identify and address significant health issues, for example by increasing access to healthy foods and developing local policies to address concerns over the development of fast food outlets close to schools.
- 2.127** Lewisham's Core Strategy (Policy 12) promotes and supports local food growing and urban agriculture which is one way to increase access to healthy food, however the Council is also concerned about restricting access to unhealthy foods. The Council encourages all take-away shops to source their food from ethical and sustainable suppliers. The Council is working to implement the Healthier Catering Commitments Scheme in Lewisham which offers practical solutions on how small changes can make food healthier, often at no cost to the business.
- 2.128** The Foresight report found that obesity levels tend to be higher in deprived areas than in wealthy areas and the National Obesity Observatory has found that there is a strong association between deprivation and the density of fast food outlets, with more deprived areas having more fast food outlets per population. A recent UK review of 33 studies looking at the location of take-away shops points out "*most of the studies have found a positive association between availability . . . of fast-food outlets and increasing deprivation . . . This is an important issue to highlight to policy decision makers as land use restrictions on new fast-food outlets may help to stop the 'deprivation amplification' effect*"<sup>(10)</sup>
- 2.129** The Council's retail surveys (2011 and 2012) show that there are 282 hot food take-away shops across the borough and the National Obesity Observatory research shows that Lewisham has the thirteenth highest density of hot food take-away shops per head of population in England. Lewisham is also the 39th most deprived borough in the country, with 8 out of 166 Super Output areas in the 10% most deprived and 64 in the 20% most deprived.

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

- 2.130** Given local and Government concerns about the impact of hot food take-away shops on human health, and the combination in Lewisham of an over-concentration of take-away shops and high levels of deprivation, the Council seeks to manage the development of new hot food take-away premises in the borough.
- 2.131** This policy applies to premises where the primary purpose is the sale of hot food to take-away (A5 uses). Applicants should set out how they are intending to trade, in line with part 3 (a-d) of the policy, and including any proposed ancillary uses. Ancillary uses may be appropriate unless specifically excluded by condition.
- 2.132** The Council has prepared a report 'Hot food take away shops: an evidence based study' (2013) which draws together information about the impact of hot food take away shops in Lewisham and the UK and provides the evidence base for this policy. The report details the national and local health concerns, associated existing evidence and how this policy can support health improvements.
- 2.133** Childhood obesity is a growing threat to children's health and Lewisham has a high proportion of children identified at risk of obesity. Additionally, the Department of Health (Healthy Lives, Healthy People, 2010) finds that obese children are more likely than children of a healthy weight to become an obese adult with associated health problems later in life. Obesity in school children in Lewisham is significantly higher than the England average and results for 2010/2011 show that 11.1% of Reception children and 24.4% of children in Year 6 are obese in Lewisham, compared to 9.4% of Reception children and 19% of Year 6 children in England.
- 2.134** The Council considers that restricting children's access to take-away shops is one way that the Council can discourage unhealthy eating and seek to stop the rising levels of obesity in the borough. For these reasons, when considering applications for hot food take-away shops, the proximity of the site to schools will be considered and in order to reduce access to fast food outlets by children, applications for hot food take-aways within easy walking distance (400 metres or less) of primary and secondary schools will be resisted.
- 2.135** Where hot food take-away shops are proposed more than 400 metres from a school, the Council will have regard to the number of existing hot food take-away premises in the immediate area. The Council will not permit more than the relevant percentage in the centre/parade to be occupied by A5 uses. The relevant percentages are based on the Council's 2012 major and district centre surveys which showed that around 5% of shops are occupied by A5 uses and the 2012 local centre survey which showed that an average of 10% of units were occupied by A5 uses.
- 2.136** The 2011 local parades survey shows a wide variation in the percentage of A5 units that make up the total number of a parade, with the average at 12%. There are over 80 local parades across the borough that vary greatly in size, from 4 units to 59 units and the number of take-away units also varies greatly, from no take-aways in 22 of the parades, increasing to 43% of units in one particular parade. Given this wide variation it is not considered appropriate to apply the average percentage to all parades and a more tailored response, relating to the number of units and the size of the parade is considered appropriate.
- 2.137** Potentially negative environmental impacts, particularly in relation to noise, smell and litter, as well as impacts on the road network should be controlled and where new take-away premises are proposed, the Council seeks to control and minimise these impacts.

Figure 2.1 Take away 400 metre exclusion zone



## 2.19 Shopfronts, signs and hoardings

### What is the aim of this policy?

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

### DM Policy 19

#### Shopfronts, signs and hoardings

1. Shopfronts should be designed to a high quality and reflect and improve the character and quality of their surroundings. This will be achieved by the following:
  - a. retention of high quality shop fronts both within and outside Conservation Areas. This includes retention of original fascias, pilasters and columns including where shop units are combined. Where retention is not possible replacements should use high quality materials and use a design appropriate to the period and character of the building
  - b. new shopfronts and the replacement of non-period shopfronts should use high quality materials and use a design that relates well to the proportion, scale and detailing of the entire host building and makes a positive contribution to the streetscape. Where possible existing original pilasters, brackets and fascias should be retained and new shopfronts should relate well to these features
  - c. new shop signs should relate successfully to the architectural features and detailing of the building. Architectural features such as cornices, pilasters and columns should not be obscured
  - d. provision of separate access to any residential accommodation on other floors and encourage the restoration of such access if already removed
  - e. provision of suitable access for people with disabilities in new shop fronts
  - f. provision of storage for refuse bins where possible
  - g. refuse permission for advertisements, banners, blinds, canopies and awnings that are considered to adversely affect the amenity and character of an area or adversely impact on public safety
  - h. roller grilles and shutters for security purposes should be of an open mesh variety leaving the shop window visible, with the box for any grille or shutter contained behind the fascia where possible
  - i. within Conservation Areas and residential areas, internally illuminated box fascia signs and projecting signs will not be permitted unless they are successfully related to the design and detailing of the building and positively contribute to the special character of a group of buildings or the street
  - j. refusing permission for open shopfronts without a traditional glazed screen that break up the visual continuity of a shopping frontage.
2. Where applications require a new shopfront, in addition to new residential or commercial units, an appropriate level of shopfront fit out will be sought.

### Justification

- 2.139** Lewisham's shopping areas are an important part of the community. They often have their own distinctive character and history (see Lewisham's Borough Wide Character Study, 2010). Well designed shopfronts of architectural or historic interest make an important contribution to the character and appearance of an area and the borough as a whole. Good examples of shopfronts should be retained wherever possible.
- 2.140** The Council will seek to ensure that new shopfronts are of a high quality and are sensitive to the area in which they are located. The standardisation in much of current shop design can gradually devalue the character and individual qualities of buildings in shopping areas. It is important that the design and materials of new and replaced shopfronts relate well to the scale of the building and surrounding buildings as well as the original features of the building and improve and enhance the setting and character of the area.
- 2.141** The Council considers that the design and quality of shopfronts can be maintained by referring to the architecture of the host building and neighbouring units and reflecting the general scale and pattern of shopfront widths in the area. New shopfronts should contribute towards a cohesive streetscape, retain a consistent building line and contribute to the character and attractiveness of the centre or parade it is located in. The detailing, quality of materials, execution and finishes are very important in shopfront design as they are viewed close-up.
- 2.142** Contemporary shopfront designs will be supported in appropriate locations. All new and altered shopfronts should be designed to be fully accessible for all. If a shopfront is replaced or altered, the design should respect the characteristics of the host building and, where appropriate, shopfront windows and framework features, such as pilasters, brackets and fascias should be retained or restored.
- 2.143** The Council considers that requiring a basic level of shopfront fit out for smaller businesses can encourage new occupiers and supports the wider aims of the Core Strategy. The Council will therefore seek an appropriate level of shopfront design detail at the initial application stage to ensure that they are of a high quality design and sensitive to the surrounding context. A basic level of shopfront fit out will also ensure the units are attractive to smaller businesses.
- 2.144** Proposed advertisement and hoarding applications should take account of the Advertisements Regulations 2007 (as amended), including factors relevant to public safety.

## 2.20 Public Houses

### What is the aim of this policy?

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

### DM Policy 20

#### Public houses

1. The Council will only permit the change of use or redevelopment of a public house (A4) after an assessment of the following:
  - a. a viability report that demonstrates to the Council's satisfaction that the public house is no longer economically viable, including the length of time the public house has been vacant, evidenced by the applicant of active and appropriate marketing for a constant period of at least 36 months at the existing use value
  - b. the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in local provision, including evidence that the premises have been offered to use or to hire at a reasonable charge to community or voluntary organisations over a 12 month period and there is no longer a demand for such use
  - c. the design, character and heritage value of the public house and the significance of the contribution that it makes to the streetscape and local distinctiveness, and where appropriate historic environment, and the impact the proposal will have on its significance
  - d. the ability and appropriateness of the building and site to accommodate an alternative use or uses without the need for demolition or alterations that may detract from the character and appearance of the building.
2. Where the evidence demonstrates to the Council's satisfaction that a public house is not economically viable, but where the building is assessed as making a significant contribution to the local townscape and streetscape, or is assessed as making a positive contribution to the historic environment, the Council will require the building to be retained, and for the ground floor to remain in use for a range of non-residential uses, including D1, as appropriate.
3. The proposed change of use of a public house for residential use will only be acceptable where:
  - a. the proposal has been assessed against parts 1c and 1d of this policy and the impact of the proposal on these features and
  - b. where the Council is satisfied that residential use is acceptable, the accommodation to be provided is to be of the highest quality and meet the requirements outlined in DM Policy 32 (Housing design, layout and space standards).

### Justification

- 2.146** The NPPF (paragraph 70) identifies public houses as a community facility that contributes to enhancing the sustainability of communities and residential environments. As such, pubs should be safeguarded and retained for the benefit of the community and planning policies and decisions should guard against the unnecessary loss.
- 2.147** This approach is supported by the London Plan (Policy 3.16 Protection and enhancement of social infrastructure) which cites the protection and enhancement of social infrastructure, which can include pubs. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for re-provision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.
- 2.148** The Council has prepared a report 'Pubs in Lewisham: an evidence based study' (2013) which draws together information about public houses in Lewisham and the UK and provides the evidence base for this policy. The report shows there are currently 92 pubs in the borough down from 115 in 2006, and during the period c.1995 to 2011, 62 pubs were closed. This follows a national trend where pub numbers have been falling for many decades.
- 2.149** The General Permitted Development Order currently allows public houses (A4 Use Class) to change to some other uses including retail, professional and financial services, and restaurants without the need for planning permission. In instances where planning permission is required, the council will resist the loss of public houses as they fulfil the following important community role:
- a **social** role in supporting local community interaction and activities to help maintain sustainable neighbourhoods;
  - an **economic** role in contributing to the vibrancy and vitality of shopping and commercial areas, and the vibrancy of residential areas contributing to a mix of land uses and
  - an **environmental** role in their intrinsic value to the cultural and historic heritage of local neighbourhoods.
- 2.150** The Council may consider the use of Article 4 directions to remove GPDO rights in relation to the change of use from A4 uses.

### Viability report

- 2.151** In order to ensure that the Council can make a sound assessment when a change of use is proposed, applicants will be required to submit a viability report. This will need to include:
- i. Evidence in the form of at least the last three trading years of audited accounts.
  - ii. All reasonable efforts have been made to preserve the public house (including all diversification options explored) and evidence supplied to illustrate that it would not be economically viable to retain the building or site for its existing use class. Examples of the initiatives or proposals that could be explored are as follows:<sup>(11)</sup>
    - adding a kitchen and serving food, or improving the existing food offer
    - making the pub, garden, food offer more 'family-friendly'
    - providing events and entertainment such as quiz nights, amplified or non-amplified live music, comedy/cabaret nights

<sup>11</sup> This list is not exhaustive and not all ideas will apply to every public house



- hiring rooms out or otherwise providing a venue for local meetings, community groups, businesses, youth groups, children's day nurseries
  - offering take-away food and off-licence services
  - provision of bed & breakfast or other guest accommodation
  - sharing the premises with other businesses
  - altering opening hours.
- iii. Details should also be provided of any changes to the public house in the period that corresponds with the trading information plus 1 year beforehand (so 4 years in total) that may have impacted on the business. For example.<sup>(12)</sup>
- Did the opening hours alter so that the pub opened less often or less frequently?
  - Were any facilities (e.g. kitchen, darts board, pool table etc) removed or regular events (e.g. quiz) cancelled?
  - Was space for meetings redeveloped or were any local groups told they could no longer use the space?
- iv. The local planning authority will require evidence that demonstrates that the public house has been operated positively i.e. that it has not been run poorly in order to smooth the way for redevelopment. Applicants should be aware that local people/customers will provide anecdotal evidence in response to neighbourhood consultations on any planning application submission.
- v. Any ancillary use associated with a public house, such as accommodation for staff or otherwise, will need to be assessed as part of the viability report.

## Marketing

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

- i. Details of the company/person who carried out the marketing exercise.
- ii. The marketing process should last for at least 36 months.
- iii. The asking price should be pre-agreed in writing with the local planning authority following independent valuation (funded by the developer) by a professional RICS valuer with expertise in the licensed leisure sector and who is not engaged to market the property.<sup>(13)</sup>
- iv. The marketing exercise should be sufficiently thorough and utilise all available forms of advertising media and therefore include as a minimum:<sup>(14)</sup>
  - a For Sale/For Rent signboard
  - adverts in the local press
  - adverts in appropriate trade magazines/journals
  - adverts on appropriate trade websites
  - adverts through both national and local estate agents (including their websites) and
  - a targeted mail shot or email to an agreed list of potential purchasers.

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

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

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

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

- v. Both freehold and leasehold options should be made available without a 'tie' requiring the purchase of drinks through the vendor and without restrictive covenants that would otherwise prevent re-use as a public house such that other pub operators, breweries, local businesses or community groups wishing to take over the premises and trade it as a pub are not excluded.
- vi. Copies of all details of approaches and offers should be provided together with full reasons as to why any offer has not been accepted.
- vii. As part of the community consultation exercise (see below), the public are to be informed about the marketing strategy and allowed the opportunity to put together their own bid.
- viii. Any attempts to sell the business at a price which reflects its current use should relate to the business in its entirety, and not to parts of it.

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

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

### **Townscape, streetscape and historic significance**

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

appropriate, consideration will need to be given to DM Policy 19 Shopfronts, where relevant. DM Policies 30 and 37 in relation to the treatment of heritage assets should also be referred to.

## 2.21 Mini cab and taxi offices

### What is the aim of this policy?

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

### DM Policy 21

#### Mini cab or taxi offices

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

### Justification

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

## 2.22 Sustainable design and construction

### What is the aim of this policy?

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

### DM Policy 22

#### Sustainable design and construction

1. In addition to those policies in the London Plan and Lewisham's Core Strategy Policies 7 and 8, the Council will require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling using the following hierarchy:
  - a. passive solar design to optimise energy gain and reduce the need for heating
  - b. passive cooling design and natural ventilation to slow heat transfer and remove unwanted heat
  - c. mixed-mode cooling, with local mechanical ventilation/cooling provided where required to supplement the above measures, using (in order of preference) low energy mechanical cooling followed by air conditioning, and
  - d. full-building mechanical ventilation/cooling systems using (in order of preference) low energy mechanical cooling followed by air conditioning.
2. For conversions to residential from other uses, the Council will encourage cost effective and proportional energy efficiency measures to be carried out where feasible to a value not exceeding 10% of the overall construction costs.
3. For minor residential extensions, the Council will seek to deliver the highest BREEAM standard provision possible for the new part and will encourage improvement of the existing house to be carried out where feasible using energy efficiency measures.
4. For non-residential extensions and conversions, the Council will seek to deliver the highest BREEAM standard provision possible for both the new and existing parts of the development. Evidence will be required to justify the standard proposed.
5. In relation to Core Strategy Policy 8 bullet 4, the Council recognises that some industrial (B2 and B8) uses may not be able to provide a minimum of BREEAM 'Excellent' standard, as they are delivering only the 'shell and core' of the building and not a full fit out. In these circumstances the Council will seek to secure the maximum points possible for those sections of the BREEAM assessment that are relevant to delivering the 'shell and core' and as a minimum, at this stage, the overall BREEAM rating should be 'Very good'. The Council will encourage the use of Allowable Solutions to assist in this process.

### Justification

- 2.164** Policy 22 implements Core Strategy Policy 7 (CSP7) and Policy 8 (CSP8). These policies deliver the approach in the London Plan Policy 5.2 (Minimising carbon dioxide emissions), Policy 5.3 (Sustainable design and construction) and Policy 5.9 (Overheating and cooling) and are supported by the London Plan SPG: Sustainable Design and Construction, 2006. The policy is consistent with the principles identified in the NPPF (paragraph 95) that encourage better energy efficiency in buildings and the reduction of greenhouse gas levels.
- 2.165** Heating and cooling are the main energy consumers in buildings and they are required to adapt to the changing climate and provide occupants comfort, by avoiding and mitigating overheating in summer. Passive solar design helps to optimise solar gains in winter to reduce the need for space heating, ventilation and artificial lighting. Passive cooling design and natural ventilation helps to slow heat transfer and remove unwanted heat. The passive heating and cooling hierarchy used in the policy is set in accordance with London Plan Policy 5.9 to minimise energy consumption.
- 2.166** Heating and cooling should be a particular consideration in locations where heat island effects could be apparent. Care should be taken to ensure that cooling design is considered alongside solar design and that the approach adopted is sustainable over the long term when allowing for the potential future impact of climate change.
- 2.167** Core Strategy Policy 8 sets out the Council's sustainable design and construction requirements for new developments using the Code for Sustainable Homes (CSH) and Building Research Establishment Environmental Assessment Method (BREEAM) standards. Residential developments must deliver Level 4 CSH standard from 1 April 2011 and Level 6 from 1 April 2016, while non-residential developments must deliver BREEAM 'excellent' standard. From October 2013, the London Plan will require that major developments provide a 40% improvement on 2010 Building Regulations levels of carbon dioxide emissions (exceeding the Core Strategy set target of 25% below 2010 Building Regulations or CSH Level 4).
- 2.168** Parts 2 and 3 of the policy add to the Core Strategy policy by detailing the Council's approach to the delivery of energy efficiency measures in extensions and conversions to residential buildings. Measures could include upgrading loft insulation, insulating cavity walls, solid wall insulation, floor insulation, improving heating controls, hot water insulation, installation of low energy lighting (e.g. LED), Sustainable Urban Drainage Systems (SUDs) or upgrading the boiler. Note that planning permission may be required for solid wall insulation and SUDs.
- 2.169** The Council consider BREEAM to be a comprehensive and appropriate standard on which to base the assessment of new non-residential developments. However, it has become clear in the implementation of Core Strategy Policy 8 that it is not feasible for some B2 or B8 uses to achieve the 'excellent' standard of BREEAM in all circumstances. Specifically, the development of large empty industrial 'sheds' without a defined end user are not always able to meet the standard required. In these circumstances it may not be possible for the developer to meet enough of the required BREEAM criteria without 'fitting out' the units, which would then limit the number of potential end users. Therefore, the Council may accept a lower level of BREEAM standard, providing robust evidence including a BREEAM pre-assessment to support the reasoning, can be provided by the applicant. Where a lower level of BREEAM is proposed, applicants should consider how the impact can be reduced by using the Council's Carbon Offset / Allowable Solutions scheme to provide funding for energy efficiency measures to be delivered by the Council off-site.

- 2.170** Listed Buildings, buildings within a conservation area and heritage assets have to maximise energy efficiency and carbon reductions whilst protecting the historic and architectural value of a historic asset. Applicants undertaking extensions, conversion or refurbishment of designated heritage assets should give consideration to the energy efficiency requirements detailed in DM Policy 22. English Heritage has published guidance on historic buildings and climate change to help in minimising carbon emissions by reducing energy consumption.<sup>(15)</sup>

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

## 2.23 Air quality

### What is the aim of this policy?

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

### DM Policy 23

#### Air quality

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

### Justification

- 2.172** DM Policy 23 implements Core Strategy Policy 7 (Climate change and adapting to the effects) and Policy 9 (Improving local air quality). These policies deliver the approach in London Plan Policy 7.14 (Improving Air Quality) and are supported by the Mayor's Air Quality Strategy (2010) and the Lewisham Air Quality Action Plan (2008) in reducing air pollution from new developments and providing appropriate measures for areas where air quality is poor. The policy is also consistent with the NPPF (paragraph 124), which states "planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of AQMAs and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in AQMAs is consistent with the local air quality action plan".
- 2.173** There are considerable health benefits related to the improvement of air quality through the reduction of air pollution in the borough. The Council's Air Quality Action Plan (AQAP) has identified that road traffic is the main source of air pollution in the borough, mostly in roads with a high flow of buses and/or HGVs, junctions and bus or coach stations. The pollutants of greatest concern in the borough are nitrogen dioxide and particles, although other pollutants such as carbon monoxide and sulphur dioxide can also impact on health at high concentrations.
- 2.174** The Council will only grant planning permission for major developments that have considered air quality through an AQIA to ensure the development meets the Council's AQAP. Additionally, planning permission will not be granted where air quality impacts can not be successfully mitigated against.
- 2.175** Lewisham adopted five AQMAs in 2001 that are located where the level of nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>) levels are higher than the National Air Quality Objectives. A further AQMA will be created around Honor Oak Park. All development proposals which may cause significant impact on air quality directly or indirectly within AQMAs will need to submit an AQIA to the Council. This needs to demonstrate how the proposal would likely impact on



local air quality, whether it is appropriate to have the proposed use, and how it would avoid, reduce and mitigate local pollutant emissions. Where appropriate, planning obligations will be sought to minimise harmful air quality impacts arising from development or offset any increase in local pollutant emissions through contributions towards the implementation of the Lewisham AQAP.

## 2.24 Biodiversity, living roofs and artificial playing pitches

### What is the aim of this policy?

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

### DM Policy 24

#### Biodiversity, living roofs and artificial playing pitches

1. The Council will require all new development to take full account of biodiversity and geodiversity in development design, ensuring the delivery of benefits and minimising of potential impacts on biodiversity and geodiversity.
2. Applicants for all major and, where appropriate, non-major development will be required to use up to date surveys and reports that are based on the latest legislation and carried out by a suitably qualified ecologist registered with the Chartered Institute of Ecology and Environmental Management (CIEEM). The surveys should be carried out during an optimal time and contain the appropriate degree of detail needed to identify and consider existing biodiversity interests and possible impacts on them, where the proposed site is part of, or located adjacent to, a site designated for its biodiversity value.
3. New living roofs are required to be designed and fitted by a qualified and accredited installer and include an extensive substrate base, except where it can be demonstrated that such a base is not feasible and achievable. Developers should enter into an agreement with an installer that guarantees 80% coverage in 5 years.
4. Artificial grass sport pitches are required to be delivered on hard surfaces and previously developed land rather than on existing natural grass, wherever feasible. Applicants should give consideration to the potential loss of open space, the effect on drainage and surface water flooding and the impact of the pitch, lighting and use on the amenity of the adjacent areas.

### Justification

- 2.177** The Council recognises the importance of protecting and enhancing the connectivity of green infrastructure and richness of Lewisham's biodiversity through good landscape design, planning and management. This policy implements Core Strategy Policy 11 (River and waterways network) (CSP11) and Policy 12 (Open space and environmental assets) (CSP12), which in turn support the approach in London Plan Policies 5.11 (Green roofs and development site environs), 7.19 (Biodiversity and access to nature) and 7.20 (Geological conservation), and the NPPF (paragraph 117). The policy is also in accordance with ODPM Circular 06/05.
- 2.178** The provision of high quality and accessible open space is important to the human health of residents in Lewisham. It provides opportunities for physical exercise and a relaxing environment, promoting mental wellbeing through the reduction of stress and depression related health issues. Usable and accessible open space can promote exposure to sunlight

which is important to avoid vitamin D deficiency, as well as providing shade to avoid too much exposure which could lead to skin cancer. This policy supports the provision of attractive and usable open space by maintaining and protecting biodiversity.

- 2.179** New development should take full account of appropriate Lewisham and London Biodiversity Action Plans and subsequently include actions as part of the Code for Sustainable Homes and BREEAM standards as set out in the Core Strategy Policy 8 and DM Policy 22.
- 2.180** The policy requires the use of up to date surveys that are completed by suitable professionals. Examples of sites in the borough that are designated as having biodiversity value include Sites of Importance for Nature Conservation, Metropolitan Open Land, Local Nature Reserves, the Blue Ribbon Network, the Waterlink Way and the South East London Green Chain Plus. A list of these sites can be found in Annex 1 of the Development Management Local Plan and are shown on the Policies Map.
- 2.181** Where appropriate, information should be supplied on how development will avoid harming species and possible measures to enhance the provision of species or create new additional opportunities for that species. Where a new development is proposing the use of mitigation and/or compensation measures, detailed information to support the proposal will be needed. The Council has prepared the Planning Application Requirements (Local) for Biodiversity Conservation Survey and Report: 'The Lewisham Biodiversity Checklist' and the accompanying Guidance Notes (Oct 2010) which can be downloaded from the Council website.
- 2.182** The Council will encourage that all ecological surveys are submitted to Greenspace Information for Greater London (GiGL, [www.gigl.org.uk](http://www.gigl.org.uk)) to assist in the collection of biodiversity information for both Lewisham and across Greater London. GiGL collate, manage and make available detailed information on London's wildlife, parks, nature reserves, gardens and other open spaces.
- 2.183** The Council will seek to maximise the use of living roofs and walls, climbing plants, roof gardens, terraces, balconies and courtyards in new development as they are feasible, to increase the vegetation cover and outdoor space for biodiversity, amenity and community benefits in urban areas. CSP12 promotes the use of living roofs and the policy adds to the approach by detailing measures to ensure provision is of appropriate quality.
- 2.184** The living roofs assembly shall as a minimum consist of a root repellent system, a drainage system, a filtering layer, a growing medium and plants, and shall be installed on a waterproof membrane on an applicable roof. The buildings should be designed to have sufficient structural capacity and integrity to resist all loads for soil, moistures, plants, rain and wind uplift, safely, effectively and permanently. It is important that living roofs are included in the early planning and design stage and supported by a qualified and accredited installer signed up to the Green Roof Organisation (GRO) principles. It should be demonstrated how the installation and maintenance will comply with the standards identified in the GRO Green Roof Code: Green Roof Code of Best Practice for the UK 2011, or any national equivalent.
- 2.185** A management and maintenance plan is required for all living roofs to include a species list and a plan for sustainable irrigation and replacement planting with a cross-section (1:20), demonstrate an appropriate substrate depth, and to ensure that within five years of the planting date the selected plants will cover no less than 80% of the vegetated roof. A contour plan will need to demonstrate how the plants and native species selected and the roof design would be beneficial to local biodiversity.

- 2.186** Artificial sports pitches can increase the potential for leisure uses in an area of open space, especially where multi-use surfaces are utilised. The Council will seek to ensure that such benefits are not outweighed by negative impacts on the open space and the surrounding environment, including biodiversity, flooding and local amenity.

## 2.25 Landscaping and trees

### What is the aim of this policy?

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

### DM Policy 25

#### Landscaping and trees

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

#### Justification

- 2.188** DM Policy 25 implements Core Strategy Policy 12 (Open space and environmental assets), which supports the approach in London Plan Policies 5.10 (Urban Greening) and Policy 7.21 (Trees and Woodlands). It is also consistent with the NPPF (paragraph 118) which requires the planning system to consider the approach to protecting trees and green landscapes.
- 2.189** The provision of high quality landscaping, along with trees, should be factored into the early design processes and integrated into the architecture of any proposed development, not considered as a post-planning exercise. Both are important to the human health of residents in Lewisham, providing opportunities for physical exercise and a relaxing environment, promoting mental wellbeing through the reduction of stress and depression related health issues.

- 2.190** Landscape Schemes are required by the Council in order to ensure that good landscaping is planned into the design of the whole development and is also realistic, implementable and sustainable in the medium to long term. As a minimum, a Landscape Scheme should include a Landscape Plan, delivery information and a Landscape Management Plan.
- 2.191** A Landscape Plan is sought for areas that are not occupied by buildings to demonstrate how the relevant existing site features are to be retained, including trees, and the presence of any species of nature conservation interest. This will help to protect and conserve urban biodiversity by maintaining an environment with trees and vegetation. To ensure the delivery of high quality landscaping, it will need to be designed by an appropriate qualified person, complement the design of the development and comply with the design policies in this plan, the Core Strategy and the London Plan. The Council will encourage applicants to embrace the use of good landscaping to assist in meeting the standards set out by the Code for Sustainable Homes and BREEAM.
- 2.192** A Landscape Management Plan is vital in ensuring the long term sustainability of landscaping. It should ensure that where relevant it considers planting plans, proposed materials and species, details of building subsidence and other liabilities, drainage, underground services and infrastructure, security and access to the development.
- 2.193** The Council will fulfil its responsibility to protect trees and woodlands where they make an important contribution to public amenity by designating Tree Preservation Orders (TPO) to protect specific trees or particular areas, groups or woodland from deliberate damage and destruction. It is a criminal offence to prune, fell or damage protected trees without getting consent from the Council, therefore applicants should ensure they safeguard all trees that are the subject of Tree Preservation Orders. The Council will enforce breaches of control and the offender is liable to substantial fines.
- 2.194** Major applications (and minor applications where appropriate) are required to retain existing trees in new development and protect trees during the construction of the development. Development schemes should not result in an unacceptable loss of trees, especially those that make a significant contribution to the character or appearance of an area, unless they are considered dangerous to the public by an approved Arboricultural Survey. Where trees are removed as part of new development, replacement planting will normally be required. New or replacement species should be selected to avoid the risk of decline or death arising from increases in non-native pests and diseases.
- 2.195** An Arboricultural Survey should include the following information:
- a. Details of the existing species, spread, roots and position of trees
  - b. Details of which trees will be felled as part of the proposed development
  - c. Details of trees that will be affected by the proposed development (including those located on adjacent sites) and what measures will be taken to protect them during construction and
  - d. Plans and documents outlined in accordance with the British Standards 5837 (2012) including, a tree survey, a tree constraints plan, an Arboricultural Implications Assessment and an Arboricultural Method Statement including a Tree Protection Plan.
- 2.196** Further guidance is available through No Trees, No Future: Trees in the urban realm, Trees and Design Action Group, Forestry Commission (2010) which provides detailed technical and good practice guidance in integrating trees in new development. The benefits of large species trees in urban landscapes: a costing, design and management guide (2012) also offers guidance to increase the number of new trees being planted and reverse the decline of existing mature trees.

## 2.26 Noise and vibration

### What is the aim of this policy?

- 2.197** The aim of this policy is to reduce excessive noise or vibration which can be detrimental to human health and well-being and can impact negatively on natural habitats. The Council recognises the importance of protecting sensitive uses from excessive noise by locating both noise sensitive developments and noise generating developments in appropriate locations.

### DM Policy 26

#### Noise and vibration

1. The Council will require:
  - a. noise and/or vibration generating development or equipment to be located in the Strategic Industrial Locations and Local Employment Locations as shown on the Local Plan Policies Map
  - b. new noise sensitive developments are to be located away from existing or planned sources of noise pollution, except if it can be demonstrated through design or mitigation that:
    - i. internal and external noise levels can be satisfactorily controlled and managed by the noise sensitive development; and
    - ii. there will be no adverse impact on the continued operation of any existing or proposed business or operation.
  - c. a Noise and Vibration Assessment for noise and/or vibration generating development or equipment and new noise sensitive development, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken.

### Justification

- 2.198** DM Policy 26 implements Core Strategy Policy 12 (Open space and environmental assets), delivers the approach adopted in London Plan Policy 7.15 (Reducing Noise and Enhancing Soundscapes), supports the Mayor's Ambient Noise Strategy (2004), the Lewisham Open Space Strategy (2012) and Lewisham's Control of pollution and noise from demolition and construction sites code of practice (2008). The policy is also consistent with the principles identified in the NPPF (paragraph 123) which encourages the identification and proper management of new and existing noise generating developments.
- 2.199** It is important for the mental health and wellbeing of the people of Lewisham that noise is monitored and managed to the right levels in the right areas. The borough contains both noise generating uses and locations that are sensitive to noise and thus DM Policy 26 is required to ensure the interaction between such areas is avoided if possible and mitigated if not.

- 2.200** Noise and vibration generating development is required to be located in the Strategic Industrial Locations (SILs) and Local Employment Locations (LELs) as defined in the Core Strategy and other Local Plans and shown on the Local Plan Policies Map. These locations, where ambient noise levels are already high, are considered appropriate for uses within the B Use Class (B1c, B8 and where appropriate B2 industry) and also suitable sui generis uses. Where developments are permitted, conditions may be attached to the planning permission to ensure effective noise insulation or other mitigation measures are undertaken to mitigate potential noise impacts.
- 2.201** New noise sensitive developments, including housing, hospitals, day centres and schools will not normally be allowed to locate near to existing or planned sources of noise pollution, especially where it would have a disproportionate effect on more vulnerable people such as the elderly or young children. Where no alternative location is available, appropriate mitigation measures of noise impacts in the design, internal layout, and treatment of the building façade would be required to achieve satisfactory internal and external living standards. Consideration should also be given to the provision of natural or mechanical ventilation where, for acoustic reasons, an alternative to opening windows is required.
- 2.202** A Noise and Vibration Assessment will be required where environmental noise is high or where a new development is likely to generate noise. This enables the Council to consider how the existing noise environment affects any proposed noise sensitive development and the potential impact that new noise generating development will have on the local area. The assessment should demonstrate compliance with and make reference to relevant British Standards and World Health Organisation (WHO) guidelines and be undertaken by a qualified acoustician.
- 2.203** The EU Environmental Noise Directive 2002/49/EC (END) sets out how to reduce the impact of noise on citizens and was transposed into the Environmental Noise (England) (Amendment) Regulations 2009. It identifies the importance of open spaces in providing tranquil havens with positive soundscapes where people can interact with the natural acoustic environment, including natural sounds, animal vocalisation, weather, water and river flows. The Council recognises the value of tranquil and quiet areas and will seek to protect and enhance them for the benefit of the local community and biodiversity.



## 2.27 Lighting

### What is the aim of this policy?

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

### DM Policy 27

#### Lighting

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

### Justification

- 2.205** DM Policy 27 supports the implementation of the Clean Neighbourhoods and Environment Act 2005 that makes light nuisance subject to the same criminal law as noise and odour and applies to 'artificial light emitted from premises so as to be prejudicial to health or a nuisance' (Section 102). Light pollution is artificial light that is allowed to illuminate, or intrude on, areas not intended to be lit, including light which is directed above the horizontal into the night sky. All forms of exterior light can bring light pollution and light nuisance if poorly designed and installed. New development may unavoidably change the natural and built environment by adding lights, such as security lights, floodlights and street-lights, which will all break into the darkness. Some security and street lights are necessary to maintain safe and functional streets, but excessive lighting is not necessary and can be avoided with good design and installation.
- 2.206** The policy supports the implementation of the NPPF which aims to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (paragraph 125) as well as the London Plan Policies 6.9 (Cycling), 6.10 (Walking), 7.3 (Designing Out Crime) and 7.5 (Public Realm).
- 2.207** Applicants are required to take appropriate measures to control the level of illumination, glare, spillage of light, angle and hours of operation. The Institution of Lighting Professionals (ILP) has produced Guidance Notes for the Reduction of Obstructive Light (2011) that provides design and installation guidance and recommendations in different environment zones and should be utilised by applicants. Where possible and feasible, energy efficient and solar powered lighting are encouraged to support the objectives of the DM Policy 22 (Sustainable design and construction) and Core Strategy Policies 7 and 8.

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

## 2.28 Contaminated land

### What is the aim of this policy?

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

### DM Policy 28

#### Contaminated Land

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

#### Justification

- 2.210** DM Policy 28 implements the planning requirements of the Environmental Protection Act 1990 and the Contaminated Land (England) Regulations 2000. It also supports the delivery of London Plan Policy 5.21 (Contaminated Land) and is consistent with the principles identified in the NPPF paragraph 109, which requires the planning system to deal with contaminated land.

- 2.211** Contaminated land is defined in section 78A(2) of the Environmental Protection Act, 1990 as any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that:
- a. significant harm is being caused or there is a significant possibility of such harm being caused, or
  - b. pollution of controlled waters is being, or is likely to be, caused.
- 2.212** Regeneration of previously developed land is a key Government policy and is integral to regenerating inner cities and creating housing and jobs. This type of land can also represent important opportunities to provide wildlife habitat, public green space, or improve urban green networks.
- 2.213** Applicants are required to undertake a full site investigation, considering the possible risks to future users of the site and potential threats in soil, ground and surface water quality and the ecosystem. Appropriate remedial measures approved by the Council are required before development can commence. A Verification Plan and subsequent Report are required to confirm that remediation works have been fully implemented and verified before occupation of the site. All investigative work and the production of plans and reports are to be undertaken by a suitably qualified person. Planning conditions and monitoring frameworks may be imposed on planning applications to reduce or remove the environmental impacts from proposals.
- 2.214** When contaminated land has the potential to affect watercourses or groundwater, the Environment Agency (EA) should be contacted to provide consultation advice. This is because under certain circumstances they become the responsible authority, as designated by Part 2A of the Environmental Protection Act 1990.

## 2.29 Car parking

### What is the aim of this policy?

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

### DM Policy 29

#### Car parking

1. The Council will require parking standards in accordance with Core Strategy Policy 14.
2. Car limited major residential development will only be considered where there is:
  - a. PTAL level 4 or higher, or where this can be achieved through investment in transport infrastructure and services,
  - b. no detrimental impact on the provision of on-street parking in the vicinity,
  - c. no negative impact on the safety and suitability of access and servicing,
  - d. protection of required publicly accessible or business use car parking,
  - e. inclusion of car clubs, car pooling schemes, cycle clubs and cycle parking and storage, as part of a package of measures mitigating the need for on-site car parking provision,
  - f. an equitable split of parking provision between private and affordable residential development, and
  - g. on-site accessible priority parking for disabled drivers.
3. Applications for the conversion of single dwellings into multiple dwellings will not be permitted to use front garden space for off-street car parking.
4. Wheelchair accessible car parking is required to be provided in accordance with best practice standards.
5. All new development will need to ensure that an appropriate number of bays have an electric charging point installed and an appropriate level of passive provision, in line with London Plan Table 6.2 Parking Standards (replicated in Appendix 8). Further, all accessible points must meet the Source London criteria so that they can become part of the London-wide network.
6. Schemes will provide appropriate levels of parking for motorcycles.

#### Justification

- 2.216** DM Policy 29 supports the implementation of Core Strategy Strategic Objective 9 and Core Strategy Policy 14 (CSP14), which state that 'a managed and restrained approach to car parking provision will be adopted to contribute to the objectives of traffic reduction'. The policy also supports the NPPF (paragraph 39) and the parking standards identified in London Plan Policy 6.13 and Table 6.2 (replicated in Appendix 8).

- 2.217** Car-limited development refers to new development that provides limited parking, below the standards set out within Policy 6.13 of the London Plan (See Appendix 8).
- 2.218** Where new development occurs close to areas where there are frequent public transport services, there is a desire to reduce the need for the car and encourage use of the public transport network available. This can help reduce air pollution and congestion and encourage physical exercise, through walking and cycling, which is beneficial to human health and wellbeing.
- 2.219** DM Policy 29 supports reducing the provision of on-site car parking where there are alternative methods of travel. The policy contains criteria to ensure that those developments seeking to reduce on-site car parking do so without unfavourably impacting the site or its surrounds and contain supporting measures to mitigate against the reduced level of on-site car parking. The policy also ensures that sites with reduced car parking retain provision for disabled drivers.
- 2.220** This policy should be read alongside Core Strategy Policy 14 to ensure all requirements for car parking are considered. In particular, Core Strategy Policy 14 promotes the potential use of Controlled Parking Zones (CPZs), which may be required to prevent parking demand being displaced from the development onto the surrounding streets.
- 2.221** As detailed in point 2.(f) of DM Policy 29, the Council will seek an equitable split of parking provision between private and affordable residential development. An equitable split may not be simply based on the number of units that are affordable / private, but may be influenced by other factors such as car ownership by housing type.
- 2.222** Wheelchair accessible parking will need to be provided even if car limited development is supported. Wheelchair parking should be provided as set out in the Council's Planning Obligations (S106) SPD and BS8300:2009, or other equivalent national standards. Developments are also required to provide adequate provision for mobility scooter storage and charging. Mobility scooters and charging points shall be located in an appropriate place within the development, such as a ground floor space next to the lifts.
- 2.223** In line with the London Plan Policy 6.13, DM Policy 29 requires 1 in every 5 car parking spaces to include an installed electric car charging point. In order to facilitate the delivery of a consistent London-wide network, new charging points are required to meet Source London criteria.
- 2.224** The policy is supported by four transport studies including a borough-wide study and specific area studies for the Lewisham and Catford town centres, and Deptford and New Cross.

## 2.30 Urban design and local character

### What is the aim of this policy?

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

### DM Policy 30

#### Urban design and local character

##### General principles

1. The Council will require all development proposals to attain a high standard of design. This applies to new buildings and for alterations and extensions to existing buildings. The requirements of Core Strategy Policy 15 which sets out the aims for each Core Strategy spatial area will need to be met.
2. Where relevant, development proposals will need to be compatible with and/or complement the urban typologies and address the design and environmental issues identified in Table 2.1 Urban typologies in Lewisham.
3. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and the development of a sense of place. Their value and significance as a heritage asset will be assessed as part of any development proposal.
4. Other elements such as open spaces, rivers and topographical features that make a positive contribution to the environment should influence the future character of an area and be treated as key elements in the development of a sense of place.

##### Detailed design issues

5. An adequate response to the following detailed matters will be required in planning applications to demonstrate the required site specific design response:
  - a. the creation of a positive relationship to the existing townscape, natural landscape, open spaces and topography to preserve and / or create an urban form which contributes to local distinctiveness such as plot widths, building features and uses, roofscape, open space and views, panoramas and vistas including those identified in the London Plan, taking all available opportunities for enhancement
  - b. height, scale and mass which should relate to the urban typology of the area as identified in Table 2.1 Urban typologies in Lewisham
  - c. layout and access arrangements. Large areas of parking and servicing must be avoided
  - d. how the scheme relates to the scale and alignment of the existing street including its building frontages

**DM Policy 30**

Cont...

- e. the clear delineation of public routes by new building frontages, with convenient, safe and welcoming pedestrian routes to local facilities and the public transport network, including meeting the needs of less mobile people and people with young children
- f. the quality and durability of building materials and their sensitive use in relation to the context of the development. Materials used should be high quality and either match or complement existing development, and the reasons for the choice of materials should be clearly justified in relation to the existing built context
- g. details of the degree of ornamentation, use of materials, brick walls and fences, or other boundary treatment which should reflect the context by using high quality matching or complementary materials
- h. how the development at ground floor level will provide activity and visual interest for the public including the pedestrian environment, and provide passive surveillance with the incorporation of doors and windows to provide physical and visual links between buildings and the public domain
- i. new development must be sustainably designed and constructed in compliance with Core Strategy Policies 7 and 8
- j. where there is an impact on a heritage asset a statement will be required that describes the significance of the asset, including its setting, and an assessment of the impact of the proposals upon that significance.

**Justification**

- 2.226** The Core Strategy requires new development in the borough to achieve a high standard of design (Core Strategy Policy 15 High Quality design for Lewisham). The policies in the Core Strategy set out a positive framework for achieving high quality and inclusive design for all development and are based on an understanding of the character of the borough and an evaluation of its characteristics. The Lewisham Core Strategy identifies four spatial policy areas (see Core Strategy Spatial Policies 2, 3, 4 and 5) which set out the general design aims for the regeneration of these areas and which provide a general framework for the type of development that will be appropriate in these areas of the borough. DM Policy 30 implements the policies in the Core Strategy which are supported by various Supplementary Planning Documents.
- 2.227** The London Plan has a suite of policies relating to place shaping and urban design. The Core Strategy Policies deliver the approach in the following London Plan Policies: Policies 7.1 (Building London's neighbourhoods and communities), 7.2 (An inclusive environment), 7.3 (Designing out crime), 7.4 (Local character), 7.5 (Public realm), 7.6 (Architecture), 7.7 (Location and design of tall and large buildings), 7.8 (Heritage assets) and 7.9 (Heritage-led regeneration).
- 2.228** The policy is consistent with the NPPF which requires new development to have a high design quality (paragraph 11, Core planning principles and Section 7, Requiring good design).



- 2.229** DM Policy 30 sets out the detailed considerations and issues that need to be considered and addressed by development applications in order to achieve the high standards of development required. New development needs to respond to its context, local character and history and, while not preventing or discouraging innovative design, should promote or reinforce local distinctiveness.
- 2.230** The potential of sites for development needs also to be optimised. Table 2.1 sets out the urban typologies from the Lewisham Borough Wide Character Study 2010 (Lewisham Character Study), relates them to the densities set out for London Plan character areas and Public Transport Accessibility levels (PTAL) and summarises the specific problems and issues which development schemes will be required to address.
- 2.231** The assignment of a housing density to a particular site is a complex issue. Table 2.2 Sustainable Residential Quality, has been included from the London Plan for information purposes<sup>(16)</sup>. If this table is revised in future versions of the London Plan the Council will use the up-dated version as appropriate. Housing densities need not be identical to that of the surrounding housing context in order to be successful and therefore the density ranges can be indicative only. Successful development will depend on thoughtful and innovative design in order to achieve an integrated result with the surrounding built context.
- 2.232** The Lewisham Tall Buildings Study (2010) identifies Strategic Site Allocations (see Core Strategy Strategic Site Allocations 2 to 6) and Lewisham and Catford Town Centres as places where, subject to further examination and assessment, tall buildings may be considered suitable. The Lewisham Character Study indicates that tall buildings may be suitable in these locations but that they should not be located where they may disrupt the flow of the topography of the borough. For reference the Local Views and Landmarks identified on the Policies Map and referred to by Core Strategy Policy 17 and which are discussed in the Lewisham Tall Buildings Study are included in Appendix 6. Core Strategy Policy 17 also refers to the protected vistas, and the London Panorama identified in the London Plan. These will be managed in accordance with the London Plan policies and the London Plan Supplementary Planning Guidance View Management Framework.
- 2.233** In line with the principles of sustainable development building materials should be obtained from sustainable sources as locally as possible while recognising that in a heavily urbanised area there will always be transport costs associated with building materials to a site. The reuse/recycling of building materials will be encouraged where appropriate.
- 2.234** Living roofs and walls will be encouraged in all appropriate circumstances (see Core Strategy Policy 7 and the London Plan).

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16 London Plan Policy 3.4 Optimising housing potential, and Table 3.2 Sustainable residential quality

Table 2.1 Urban typologies in Lewisham

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

**Note: Many of these areas are designated as Conservation Areas and have been the subject of Conservation Area Appraisals where more detail in the character and issues discussed below can be found.**

**Note: For definitions of various types of garden and amenity areas refer to DM Policy 33**

Lewisham Character Study typologies	London Plan density	Examples of the streets/areas within each urban typology	Lewisham Character Study identified issues
<b>Housing - Perimeter Blocks</b>			
Urban Terrace	Urban	Corbett Estate Catford (e.g. Braidwood Road, Killearn Road, Glenfarg Road); streets in the Hatcham Conservation Area at New Cross Gate; terraces to the west of the railway lines between Brockley and Honor Oak Park stations and east of Brockley Road	New development should not disrupt the regularity of the street form and the unity of the architecture. New separate dwellings in rear gardens in this urban typology will not be acceptable because of the disruption to its tight urban design form, usually with smaller sized gardens, and the difficulty in achieving a good standard of amenity for neighbouring occupiers. Opportunities should be taken wherever possible to remedy alterations to the existing terraces which have weakened the coherence of this urban form by mixes of boundary treatments, loss of front gardens, the introduction of modern doors and windows and unsympathetic infill development.
Suburban Terrace	Suburban	Estates at Bellingham and Downham, Milborough Crescent, Further Green Road, South Park Crescent	The major issues facing these areas are the sensitive management of change, the consistency of building facades where relevant and the maintenance of scale of development and the spaces between the short terraces. New development should be sensitive to this context. New separate residential dwellings in the rear gardens of this urban typology will not be considered acceptable due to the difficulty of achieving a good design fit with neighbouring developments, and disruption to the urban form which consists largely of short terraces.
Suburban Housing	Suburban	Tewkesbury Avenue, Westwood Park,	While building design and configurations vary there is often a relatively consistent approach to the styles and fashion of the period which establishes a

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**Note: For definitions of various types of garden and amenity areas refer to DM Policy 33**

Lewisham Character Study typologies	London Plan density	Examples of the streets/areas within each urban typology	Lewisham Character Study identified issues
Suburban housing - issues		Liphook Crescent, Forest Hill; Crantock Road, and Newquay Road, Catford; Exford Road and Jevington Way, Grove Park	<p>reasonably cohesive feel, and building line. Buildings are most likely to be two storeys although three storey examples can be found. New development in these areas should respond to this context.</p> <p>Development of new separate dwellings in the rear gardens of this urban typology will not generally be acceptable due to the difficulty of maintaining the established character of these areas as identified in the Lewisham Character Study.</p>
Villa	Suburban	Streets in Lee Manor Conservation Area, large areas of residential development in Blackheath, Brockley, Forest Hill and Telegraph Hill Conservation Areas	<p>These areas have the lowest density of the Perimeter block type. These buildings are generally set within a plot with a clear break between buildings. Buildings are generally larger than later suburban housing, both in size and in the proportion of the buildings with more generous floor to ceiling heights.</p> <p>Modern development has had a significant impact on villa types in terms of the conversion of dwellings, and replacement by modern blocks of flats which although usually maintaining the layout and spacing characteristic of this typology, do not maintain the spacious proportions of the buildings themselves, which has an impact on the character and quality of these areas. New development in these areas should respond to this context both by preserving the proportions of the buildings themselves and the spaces between the buildings.</p> <p>New separate residential developments in the side or rear gardens of this urban typology will not generally be acceptable in order maintain the characteristic residential quality of this urban typology.</p>

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

**Note: Many of these areas are designated as Conservation Areas and have been the subject of Conservation Area Appraisals where more detail in the character and issues discussed below can be found.**

**Note: For definitions of various types of garden and amenity areas refer to DM Policy 33**

Lewisham Character Study typologies	London Plan density	Examples of the streets/areas within each urban typology	Lewisham Character Study identified issues
<b>Housing - Complex Blocks</b>			
Urban Complex Block	Urban	Armoury Road Lewisham; Pincott Place Crofton Park; Southerngate Way, Myers Lane, John Williams Close, New Cross	<p>These areas feature a mix of flats and houses and tend to follow the traditional street grid system. The streets are however designed to accommodate sufficient parking for all residents which enlarges the amount of street space with hard standing and with larger frontage to frontage distances than older areas. Internal parking courts and mews tend to break up the clarity of public and private space.</p> <p>New development on amenity areas, and non-garden areas within this typology should not seek to replicate this layout but should aim to re-introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.</p>
Suburban Complex Block	Suburban	Pennington Way, Edward Tyler Road Grove Park; Foxborough Gardens, Rushey Mead, Dressington Avenue, Ladywell	<p>These represent the trend for cul-de-sacs in later twentieth century development. They feature low densities of housing and have generally poor permeability and legibility.</p> <p>Plot configurations vary enormously in this typology as most are grouped in an irregular way around a curving street layout. A common feature is that houses in this form rarely feature gardens deeper than 10 metres creating a minimum back-to-back relationship with a basic level of privacy. Private rear gardens in this urban typology will therefore not be suitable for development.</p> <p>New development in amenity and non garden areas within this typology should not seek to replicate this layout but should aim to re-introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.</p>

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

**Note: Many of these areas are designated as Conservation Areas and have been the subject of Conservation Area Appraisals where more detail in the character and issues discussed below can be found.**

**Note: For definitions of various types of garden and amenity areas refer to DM Policy 33**

Lewisham Character Study typologies	London Plan density	Examples of the streets/areas within each urban typology	Lewisham Character Study identified issues
<b>Housing - Free Form</b>			
Towers and Slabs	Central Urban or Suburban dependent on context	Towers - Examples: Lewisham Park; Tower Blocks on Pepys Estate  Slab Bocks - Examples: Lovelinch Close, Sharrat Street, Winslade Estate; St Norbert Road; Pepys Estate: Wood Vale Estate	The Lewisham Character Study identifies these areas as failing to establish a clear structure of routes and private spaces, and lacking a sense of ownership and surveillance necessary for a safe street through the lack of a clear definition of public and private areas, as there are usually very few private gardens in this style of development. The provision of amenity space is generally in the form of open grassed spaces and play areas which do not define public and private space or provide a coherent street scene.  A replication of this style of development will not be considered appropriate in future development schemes. Any new or replacement development would need to meet the design aims and policies for new development in the Core Strategy and Development Management Local Plan and aim to re-introduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.
Houses (Free Form low rise)	Urban or Suburban	Aldersgrove and Lambcroft Avenue, Grove Park; Ewart Road and Dalmain Road, Forest Hill; Wild Goose Drive and Denet's Road New Cross	This form of development features low rise terraces and detached buildings which have a fragmented urban layout. This typically offers a poor relationship between building frontages and public spaces. The layouts provide a fragmented structure in which car movement and pedestrian movement are separate with parking typically provided in parking courts. The boundaries of rear gardens are often exposed to the public realm, creating areas of dead frontage. Individual plots in this typology are often shallow with small private gardens where provided, which would not be capable of redevelopment. Any development on open amenity areas, or non garden areas in this urban typology should not seek to

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

**Note:** Many of these areas are designated as Conservation Areas and have been the subject of Conservation Area Appraisals where more detail in the character and issues discussed below can be found.

**Note:** For definitions of various types of garden and amenity areas refer to DM Policy 33

Lewisham Character Study typologies	London Plan density	Examples of the streets/areas within each urban typology	Lewisham Character Study identified issues
			replicate this style but aim to reintroduce the positive elements of the urban terrace typology in ensuring clear legible routes, and well defined private and public spaces.

Table 2.2 Sustainable Residential Quality Matrix from the London Plan

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

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

### 2.31 Alterations and extensions to existing buildings including residential extensions

#### What is the aim of this policy?

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

#### DM Policy 31

##### Alterations and extensions to existing buildings including residential extensions

1. Development proposals for alterations and extensions, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, and detailing of the original buildings, including external features such as chimneys, and porches. High quality matching or complementary materials should be used, appropriately and sensitively in relation to the context. New rooms provided by extensions to residential buildings will be required to meet the space standards in DM Policy 32 Housing design, layout and space standards.
2. In addition, where it is necessary:
  - a. side extensions should normally be set back and down from the main building line to allow for a clear break between existing buildings and the new work in order to maintain architectural subordination to the original building
  - b. rear extensions will generally not be permitted where any part is higher than the height of the ridge of the main roof, or where the extension is not set back into the roof slope. Roof extensions on the street frontage of a building, particularly in a residential street will be resisted in favour of extensions to the rear of the building. Rooflights on the front roof slope of buildings should be considered in relation to the design of the dwelling and harmonise with the street-scene
  - c. residential extensions, roof terraces and balconies and non-residential extensions adjacent to dwellings should result in no significant loss of privacy and amenity (including sunlight and daylight) to adjoining houses and their back gardens. The requirements of DM Policy 32 should be referred to as appropriate. Residential extensions should retain an accessible and usable private garden that is appropriate in size in relation to the size of the property, and retain 50% of the garden area
  - d. additional or enlarged windows, doors and other openings, should be in keeping with the original pattern, and in the case of a roof extension should reflect the existing alignment of the windows. Replacement windows where controllable by the Council should closely match the pattern of the original windows. The repair of original windows will be encouraged
  - e. details of plant, pipework, fire escapes, lifts and other mechanical equipment including ducts and flues should be included within the initial planning application and be enclosed within the envelope of the building or, where that is impracticable, sited where they will have the least visual impact
  - f. the Council will consider proposals for building extensions that are innovative and have exceptional design quality where these are fully justified in the design and access statement.



### DM Policy 31

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3. Extensions will not be permitted where they would adversely affect the architectural integrity of a group of buildings as a whole or cause an incongruous element in terms of the important features of a character area.
4. Where the roofline or party walls of buildings or terraces are exposed to long views from public spaces, a roof extension in any form that would have an obtrusive impact on that view will not be permitted.

### Justification

- 2.236** This emphasis of this policy is on the detailed design of new building extensions. The Core Strategy requires new development in the borough to achieve a high standard of design (Core Strategy Policy 15 High quality design for Lewisham). Core Strategy Spatial Policy 5 sets of a general framework for the type of development that will be appropriate in residential areas of the borough. DM Policy 31 implements the policies in the Core Strategy.
- 2.237** The Core Strategy Policies implement London Plan Policies 7.4 (Local character) and 7.6 (Architecture) and are also supported by London Plan Policy 3.5 (Quality and design of housing developments) which requires new development to have minimum space standards.
- 2.238** DM Policy 31 is consistent with the NPPF in relation to provision of high quality design, the creation of attractive streetscapes and buildings, and responds to local character appropriately (paragraph 11, Core planning principles and Section 7, Requiring good design).
- 2.239** Alterations and extensions to buildings are often necessary to modernise, adapt, enlarge or extend the life of a building and therefore contribute to sustainable development. If unsympathetically done they may harm the appearance of buildings individually or collectively, and cumulatively be detrimental to the townscape of the borough and the quality of the borough's residential environment.
- 2.240** The Lewisham Character Study identifies features of the street scene and the layout of development which should be preserved. This policy provides a framework for controlling extensions to buildings so that they harmonise or complement character areas where they require planning permission.
- 2.241** Extensions and alterations to buildings should not significantly harm existing residential amenity in line with Core Strategy Spatial Policy 5 and Core Strategy Policy 15.

### 2.32 Housing design, layout and space standards

#### What is the aim of this policy?

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

#### DM Policy 32

##### Housing design, layout and space standards

##### Siting and layout of development

1. The Council expects all new residential development to:
  - a. be attractive and neighbourly
  - b. provide a satisfactory level of privacy, outlook and natural lighting both for its future residents and its neighbours and
  - c. meet the functional requirements of future residents.
  
2. The siting and layout of new-build housing development, including the housing element of mixed use developments, will need to respond positively to the site specific constraints and opportunities as well as to the existing and emerging context for the site and surrounding area.
  
3. New-build housing development will be required to be:
  - a. sited to minimise disturbance from incompatible uses and be well located in relation to public transport with a high quality pedestrian environment. Table 2.2 Sustainable Residential Quality Matrix will be used to aid assessment of the appropriate density of development in relation to public transport accessibility and character areas
  - b. provided with a readily accessible, secure, private and usable external space and include space suitable for children's play
  - c. designed so that schemes in mixed tenure do not distinguish between public and private housing provision either in terms of quality of materials and design, or in level of amenities
  - d. designed to be safe and secure and reduce crime and the fear of crime
  - e. designed to ensure that internal layout and external design features ensure that housing is accessible to all intended users.

## DM Policy 32

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### Internal standards

4. The standards in the London Plan will be used to assess whether new housing development provides an appropriate level of residential quality and amenity. This will involve an assessment of whether the proposals provide accommodation that meet the following criteria:
  - a. meet the minimum space standards for new development which should conform with the standards in the London Plan
  - b. habitable rooms and kitchens and bathrooms are required to have a minimum floor height of 2.5 metres. between finished floor level and finished ceiling level. Space that does not meet this standard will not count towards meeting the internal floor area standards
  - c. provide accommodation of a good size, a good outlook, with acceptable shape and layout of rooms, with main habitable rooms receiving direct sunlight and daylight, and adequate privacy. There will be a presumption that residential units provided should be dual aspect. Any single aspect dwellings provided will require a detailed justification as to why a dual aspect dwelling is not possible and a detailed demonstration that adequate lighting and ventilation can be achieved. North facing single aspect flats will not be supported.
  - d. family housing (dwellings with three or more bedrooms) should be designed to have the potential to separate dining and living accommodation from the kitchen area in order to ensure privacy for the occupants
  - e. Single person dwellings will not be supported other than in exceptional circumstances. Developments will be required to have an exceptional design quality and be in highly accessible locations
  - f. include sufficient space for storage and utility purposes in addition to the minimum space standards.

Table 2.3 Minimum space standards for new housing development including conversions<sup>(17)</sup>

Dwelling Type	Bedroom (b) / persons - bedspaces (p)	GIA (sq m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
	2 storey houses	2b4p
3b4p		87
3b5p		96
4b5p		100
4b6p		107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

**Justification**

**2.243** DM Policy 32 implements, in relation to housing development, Core Strategy Policy 15 (CSP15) which sets out the over-arching principles for new development of whatever type in Lewisham.

**2.244** The standards and criteria in this policy, including those taken from the London Plan and the London Plan Housing Supplementary Guidance, will ensure a reasonable level of residential amenity and quality of life, and that there is sufficient space, privacy and storage facilities in development to ensure the long term sustainability and usability of the homes. Table 2.3 Minimum space standards for new housing development including conversions, include the current London Plan standards and have been quoted for information purposes

17 All new residential developments and conversions including conversions of commercial space and space above shops are required to meet or exceed the standards or as updated and amended by future alterations of the London Plan

and convenient reference. Should these standards change in future versions of the London Plan then the new standards will be used. This policy therefore implements London Plan Policy 3.5 Quality and Design of Housing Developments.

- 2.245** DM Policy 32 is consistent with the NPPF which states that Local Planning Authorities should 'always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings' (paragraph 17 the Core planning principles) and Section 7, Requiring good design.
- 2.246** High density new development in the form of purpose built flats proposed in the Core Strategy means that in order to be livable, a reasonable amount of usable external space needs to be provided. This may mean that amenity space is provided in the form of balconies and roof terraces rather than in the form of gardens. Balconies and terraces should be large enough to be usable as an amenity space and should have a minimum width of 1500mm. Roof terraces and gardens should be designed with the security of the users in mind and also achieve a sense of enclosure. This form of external space may give rise to problems of privacy and overlooking in traditional street layouts and are more suited to dense urban areas where balconies and terraces are a more typical form of development. Family houses should be provided with their own private garden area of a size appropriate to the design and configuration of the housing site, the size of the houses and their intended occupancy. The Council will apply the standards of the London Plan Supplementary Planning Guidance, 'Providing for Children and Young People's Play and Informal Recreation', which specifies 10 square metres of playspace for each child.
- 2.247** Flexible and adaptable housing design reduces the need to move from home to home and allows for the sustainable development of communities. Larger room sizes can be used more flexibly as they are generally more adaptable. The South East London Housing Partnership Wheelchair Homes Design Guidelines comply with (and generally exceed) Part M of the Building Regulations, British Standard 8300, Lifetime Homes, the Housing Corporation 'Design and Quality Standards/Stephen Thorpe's 'Wheelchair Housing Design Guide' and the Mayor of London's Wheelchair Accessible Housing Guide. The South East London Housing Partnership Wheelchair Homes Design Guidelines (or as subsequently amended), will be used to assess whether new build housing schemes meet Lifetime Homes and Wheelchair Housing Standards both in terms of internal layout and the external design features needed to ensure houses are accessible to their users. The adoption of the space standards for housing in this policy has been tested and adopted by the London Plan. Small studio flats intended for single person occupation are not considered to provide long term, sustainable solutions to housing need. In the exceptional cases when they are provided they will need to be in places that are not isolated and provide very good access to public transport and other amenities.
- 2.248** The minimum floor heights set out in clause 4.b of the policy are a guideline. Dependent on the format and aspect of the room this standard may need to be achieved in order to achieve adequate amenity and daylighting. Additionally there is a requirement in DM Policies 30 and 33 to respect the form and proportions of adjacent development where these form part of the character of an area.
- 2.249** A dual aspect dwelling is defined as one with openable windows on two external walls, which may be opposite or adjacent around a corner. Single aspect flats are difficult to naturally ventilate and more likely to overheat, an increasing concern for homes in London due to anticipated temperature increases from climate change coupled with the urban heat island effect where London is inherently warmer than its surrounding areas. Single aspect flats will only be permitted where the design is shown to allow adequate daylight and ventilation to all habitable rooms and direct sunlight to at least one habitable room for part of the day. Living areas and kitchen spaces should preferably receive direct sunlight.

- 2.250** Adequate privacy is an essential element in ensuring a high level of residential amenity. Unless it can be demonstrated that privacy can be maintained through design, there should be a minimum separation of 21 metres between directly facing habitable room windows on main rear elevations. This separation will be maintained as a general rule but will be applied flexibly dependent on the context of the development. A greater separation distance will be required where taller buildings are involved.

### 2.33 Infill, backland, back garden and amenity area development

#### What is the aim of this policy?

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

- A. Infill sites are defined as sites within street frontages such as former builders yards, small workshops and garages, gaps in terraces and gardens to the side of houses. Infill sites may present urban design problems in harmonising the development with the existing built form.
- B. Backland sites are defined as 'landlocked' sites to the rear of street frontages not historically in garden use such as builders yards, small workshops and warehouses, and garages. They require sensitive treatment and a high quality of design in order to achieve successful development because of the potential for visual and functional intrusion due to the close proximity to existing housing.
- C. Back gardens are private amenity areas that were the entire back garden to the rear of a dwelling or dwellings as originally designed. Gardens used to be considered previously developed land (PDL) with a presumption in favour of development. Gardens are no longer considered to be PDL which means that there is no longer a presumption in favour of development. Back gardens in the 'perimeter block' urban typologies identified in the Lewisham Borough Wide Character Study (2010) (Lewisham Character Study) which have more or less enclosed rear gardens, are considered to be an integral part of the original design of these areas and provide valuable amenity space and an ecological resource. Development of separate dwellings in the back gardens of these urban typologies will not be considered acceptable.<sup>(18)</sup> Other typologies also often have dwellings with private back gardens that do not form such a strong design feature of the development. These are typically more modern developments which feature small gardens which are rarely longer than 10 metres or are quite narrow, and are therefore not suitable for development.<sup>(19)</sup>
- D. Amenity areas are communal amenity areas attached to residential development. Examples of these are:
  - private communal gardens for small blocks of flats
  - landscaped spaces around taller blocks of flats<sup>(20)</sup> and around low and medium rise 'slab blocks'<sup>(21)</sup> where typically the distinction between the public and private realms is ambiguous and which provide a generally less secure environment as a result.

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

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

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

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

21 Free form-slabs in the Lewisham Character Study

### DM Policy 33

#### Development on infill sites, backland sites, back gardens and amenity areas

##### General principles

1. Depending on the character of the area and the urban design function a space fulfils in the streetscape, some sites will not be considered suitable for development and planning permission will not be granted.
2. If a site is considered suitable for development, planning permission will not be granted unless the proposed development is of the highest design quality and relates successfully and is sensitive to the existing design quality of the streetscape, and is sensitive to the setting of heritage assets. This includes the spaces between buildings which may be as important as the character of the buildings themselves, and the size and proportions of adjacent buildings.
3. Development on these sites must meet the policy requirements of DM Policy 30 (Urban design and local character), DM Policy 32 (Housing design, layout and space standards) and DM Policy 25 (Landscaping and trees).
4. Development on these sites should retain existing formal or informal pedestrian through routes.

##### A. Infill sites

5. Development within street frontages and on street corners will only be permitted where they:
  - a. make a high quality positive contribution to an area
  - b. provide a site specific creative response to the character and issues of the street frontage typology identified in Table 2.1 Urban typologies in Lewisham and to the special distinctiveness of any relevant conservation area
  - c. result in no significant overshadowing or overlooking, and no loss of security or amenity to adjacent houses and gardens
  - d. provide appropriate amenity space in line with DM Policy 32 (Housing design, layout and space standards)
  - e. retain appropriate garden space for adjacent dwellings
  - f. repair the street frontage and provide additional natural surveillance
  - g. provide adequate privacy for the new development and
  - h. respect the character, proportions and spacing of existing houses.

##### B. Backland sites

6. New development on sites of this type will only be permitted where they provide:
  - a. a proper means of access and servicing which is convenient and safe both for drivers and pedestrians



### DM Policy 33

6. Cont...
  - b. no significant loss of privacy, amenity, and no loss of security for adjoining houses and rear gardens and
  - c. appropriate amenity space in line with the policy requirements in DM Policy 32 (Housing design, layout and space standards).
7. Gated developments on these sites that prevent access which would normally be provided by a publicly accessible street will not be supported.

#### C. Back gardens

8. The development of back gardens for separate dwellings in perimeter form residential typologies identified in the Lewisham Character Study will not be granted planning permission. Private back gardens in all urban typologies should be retained in development proposals involving new separate dwellings.

#### D. Amenity areas

9. Proposals for new residential development on amenity areas of landscaped open space attached to existing residential development will only be permitted where they:
  - a. repair or re-provide active street frontages
  - b. increase natural surveillance
  - c. retain existing private rear gardens where they are provided
  - d. retain adequate amenity space for the existing development according to the requirements of DM Policy 32 (Housing design, layout and space standards)
  - e. provide no significant loss of privacy and amenity, and no loss of security for adjoining residential development and private back gardens and
  - f. provide adequate privacy for the new development.

### Justification

- 2.253** This policy implements Core Strategy Spatial Policy 5 (Areas of Stability and Managed Change) and Core Strategy Policy 15 (High quality design for Lewisham) which ensure that new development in residential areas will protect their existing character and residential quality.
- 2.254** The Core Strategy policies implement London Plan policy 3.5 Quality and Design of Housing Developments and policy 7.4 Local Character.
- 2.255** The NPPF requires all new development to achieve high quality design. DM Policy 33 is consistent with the NPPF in relation to provision of high quality design, the creation of attractive streetscapes and buildings, and responds to local character appropriately (paragraph 11, Core planning principles and Section 7, Requiring good design, and paragraph 53). Local

planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.

- 2.256** Infill and backland development needs sensitive design in order to not detract from the character of the street scene, the architectural integrity and scale of adjacent buildings or from residential amenity. Development on mid-terrace sites will require particular attention to be paid as to how it will relate successfully and complement the character of the street.
- 2.257** Good access to development on backland sites is a key issue and will be an important factor when considering development applications. Emergency vehicles, refuse vehicles and delivery services need appropriate access. Pedestrian access needs to be safe for all users and avoid conflict with vehicles. If safe and convenient access cannot be achieved for all users then developments will be refused.
- 2.258** New development on these sites should ensure that existing pedestrian connections with the rest of the neighbourhood, whether formal or informal, are retained in order to ensure permeability and the integration of the new development. Gated sites are considered to be less secure due to the reduction of natural surveillance available to the site, and harms the integration, permeability and cohesiveness of neighbourhoods. Security should be maintained through design, and gated developments will not be considered acceptable. New developments on these sites should also not result in a loss of security to adjacent dwellings.
- 2.259** Garden land is no longer considered to be previously developed land. The Lewisham Character Study identifies various urban typologies where the built form relies on more or less regular street forms, building facades, and garden areas where developments on back gardens are likely to have a negative impact on the design integrity of the street scene.
- 2.260** NPPF (paragraph 53) supports the setting out of policies to resist inappropriate development of residential gardens which would cause harm to the local area. The London Plan also supports a presumption against development on back gardens or other private residential gardens where this can be locally justified (Policy 3.5, Quality and design of housing developments). The Lewisham Character Study provides this justification by identifying the essential contribution that rear gardens make to the character and quality of perimeter style developments.
- 2.261** This policy requires that sufficient garden amenity areas in these new developments to be provided in line with DM Policy 32. This policy requires all new development to 'be provided with a readily accessible, secure, private and usable external space and include space suitable for children's play.' In the case of development on these sites this requirement will mean that garden space must not be provided in a piecemeal fashion in a series of small garden areas, but as a usable space suitable for the intended occupants, including where appropriate, for children's play.
- 2.262** Back gardens in perimeter style residential developments are considered to be an important amenity resource and make an essential contribution to the character and quality of the residential areas identified in the policy. They provide high quality amenity space for occupiers of the houses in perimeter style developments and are a very significant ecological resource. The report 'London Garden City' (2010) prepared by the London Wildlife Trust examines the changing anatomy of London's private gardens, and the scale of their loss. The report estimates that between April 2005 and March 2008 that the amount of garden green space decreased significantly. New gardens in developments were small resulting in a loss of garden cover and biodiversity value and so the cumulative effect was a loss of biodiversity. For these reasons the policy seeks to prevent development in the rear gardens of these listed typologies.

**2.263** Many urban typologies identified in the Lewisham Character Study do not have the regularly arranged character of the perimeter style developments as they are more fragmented (slab blocks, and towers), or have less well defined open amenity areas and/or have small gardens (complex urban and suburban block typologies, free form low rise houses). Table 2.1 Urban Typologies in Lewisham identifies the design and character issues that relate to garden and amenity areas in these typologies based upon the Lewisham Character Study. It is considered that development on private back gardens in these typologies would not be suitable or possible without severely affecting the residential amenity of these dwellings. Any development in these areas would need to address the requirements identified in DM Policies 30 and 32, retain sufficient amenity space and provide appropriate access. Development in open amenity areas in these urban typologies should aim to re-provide and/or repair a perimeter form of urban typology. It is considered vital to preserve the amenity of houses with small back gardens in modern developments by retaining these gardens in any development proposals.

### 2.34 Thames Policy Area and Deptford Creekside

#### What is the aim of this policy ?

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

#### DM Policy 34

##### Thames Policy Area and Deptford Creekside

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

#### Justification

- 2.265** The Core Strategy provides a range of references to the importance of the River Thames and Deptford Creek within the following policies: Spatial Policy 2, Core Strategy Policy 11, 12, 14, 15, 16, 17, 18 and Strategic Site Allocation 2. DM Policy 34 implements these policies and brings together all those references with a focus on the specific qualities new development should have in relation to the river environment. The Core Strategy policies listed above implement the approach in London Plan Policies 7.5 (Public realm), 7.24 (Blue ribbon network), 7.25 (Increasing the use of the blue ribbon network for passengers and tourism), 7.26 (Increasing the use of the blue ribbon network for freight transport), 7.27 (Blue ribbon network: supporting infrastructure and recreational use), 7.28 (Restoration of the blue ribbon network), 7.29 (The River Thames), 7.30 (London's canals and other rivers and waterspaces), 7.19 (Biodiversity and access to nature).
- 2.266** The River Thames has a special character and quality identified in the London Plan Policy 7.29 (The River Thames) which designates the Thames Policy Area. London Plan Policy 7.30 (London's canals and other rivers and waterspaces) states that development should

respect the local character of these features and London Plan Policy 7.4 (Local character) which proposes the protection of the character of landscapes, buildings and places on the Blue Ribbon Network. The Core Strategy policies referred to above implement these policies.

- 2.267** The River Thames in the borough has several important functions to play in terms of potential contribution to transport, contribution to nature conservation interest, flood defence, archaeology and other heritage assets. It is a Site of Importance for Nature Conservation of Metropolitan Importance and an Area of Archaeological Priority. These interests should be protected and enhanced by new development.
- 2.268** The Council considers that Deptford Creek and the sites adjacent represent a valuable historical, ecological and heritage asset for the borough which will be protected by this policy. A conservation area was declared at Deptford Creekside in 2012, which recognises that the area retains a special old industrial character which should be preserved in future development. The Creek itself is a Site of Importance to Nature Conservation of Metropolitan Importance. The Creek walls are an important flood defence which have been managed in places to also enhance the ecological value of the Creek.
- 2.269** The Marine Management Organisation (MMO) should be referred to for guidance on any planning activity that includes a section of coast or tidal river. All planning decisions that relate to the UK marine area must be made in accordance with the UK Marine Policy Statement. The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations (as amended). Early consultation with the MMO is advised.

### 2.35 Public realm and street furniture

#### What is the aim of this policy?

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

#### DM Policy 35

##### Public realm

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

#### Justification

- 2.271** DM Policy 35 implements Core Strategy Policies 14, 15, and 16. DM Policy 35 also implements Core Strategy Spatial Policies 2, 3, 4, and 5 which set out various aims for the public realm and also the pedestrian environment. These policies deliver the approach in London Plan Policies 7.2 (An inclusive environment), and 7.5 (Public realm).
- 2.272** DM Policy 35 is consistent with the NPPF para. 35 which states among other things that development 'create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter' and 'consider the needs of people with disabilities by all modes of transport'. Para 57 states that 'It is important to plan positively for the achievement of high quality and inclusive design for all development, including

individual buildings, public and private spaces'.and wider area development schemes. DM Policy 34 is also consistent with NPPF Section 12 'Conserving and enhancing the historic environment'.

- 2.273** The Council wishes to enhance the appearance of streets in the borough and to minimise clutter. If care is not taken, and the street scene not viewed as a whole, incremental signage schemes, careless placement of litter bins, benches, telephone kiosks together with street lights, planters, recycling banks and junction boxes can result in confusion and untidiness. It may be necessary to review where facilities have been duplicated over time and excess numbers removed. The siting of trees, street furniture and good quality level paving is vital for all street users. Refer to DM Policy 25 Landscaping and trees, for further details.
- 2.274** The London Borough of Lewisham Streetscape Guide outlines clear principles that will be expected to be upheld when designing or redesigning the streetscape, as well as the bare minimum standards acceptable in terms of workmanship and materials. It also includes specific guidance to show how these principles and minimum standards can be met. Transport for London (TfL) have also produced Streetscape Guidance (2009) for use on TfL roads.
- 2.275** Specific mention is made in this policy of the important and valuable contribution historic street furniture makes to the historic environment, its status as non-designated heritage assets and the need to preserve these features. The character and appearance of all heritage assets is enhanced and to a degree dependent on the treatment of roads, pavements and other public space.

### 2.36 Listed Buildings, Conservation Areas and other designated heritage assets

#### What is the aim of this policy?

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

#### DM Policy 36

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

#### **A. General principles**

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

#### **B. Conservation areas**

4. The Council, having paid special attention to the special interest of its Conservation Areas, and the desirability of preserving or enhancing their character or appearance, will not grant planning permission where:
  - a. new development or alterations and extensions to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials



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- b. development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the conservation area
  - c. development adjacent to a Conservation Area would have a negative impact on the significance of that area.
5. The Council will encourage the reinstatement or require the retention of architectural and landscaping features, such as front gardens and boundary walls, important to an area's character or appearance, if necessary by the use of Article 4 Directions.
  6. The Council will require bin stores and bike sheds to be located at the side or rear of properties where a front access to the side and rear exists.

### C. Listed buildings

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

### D. Scheduled Monuments and Registered Parks and Gardens

9. Scheduled Monuments will be protected and preserved in accordance with Government regulation. Where the site or setting is adversely affected planning permission will be refused.
10. When considering the impact of a development proposal on Registered Parks and Gardens, or on their settings, the Council will consider that any loss or substantial harm to these assets will be in wholly exceptional circumstances. The Council will apply the provision in point 2 of the above policy to the assets.

### Justification

- 2.278** DM Policy 36 implements Core Strategy Policy 16, which sets out a framework for the protection of the borough's designated heritage assets. Core Strategy Policy 16 delivers the approach in London Plan Policies 7.8 (Heritage assets and archaeology) and 7.9 (Heritage-led regeneration).
- 2.279** The Council has a duty to preserve the character of Listed Buildings under the provisions of Sections 54-56 of the Planning (Listed Buildings and Conservation Areas) Act. The policy is consistent with the NPPF. The Historic Environment Planning Practice Guide to PPS5 provides guidance to assessing development applications for Listed Buildings. The policy seeks to achieve this aim through measures to control, improve and guide changes to Listed Buildings.
- 2.280** DM Policy 36 summarises the steps the borough will take to manage changes to Conservation Areas, Listed Buildings, Scheduled Ancient Monuments and Registered Parks and Gardens so that their value and significance as designated heritage assets is maintained and enhanced. The Council has an ongoing programme to review the borough, proposing buildings suitable for statutory listing, and designating new conservation areas and extending existing ones as appropriate and as resources permit.
- 2.281** The significance of heritage assets can be harmed or lost through alteration or destruction of the asset or development within its setting. The policy is intended to ensure that the particular significance of a heritage assets and the value it holds for this and future generations is fully understood. This understanding serves as a baseline for assessing the impact of any development so that that proper weight can be given to its conservation.
- 2.282** The value of the townscape of a Conservation Area, for example, depends on much more than the quality of individual buildings – on the historic layout of property boundaries and thoroughfares; on a particular 'mix' of uses; on characteristic materials and detailing; on street furniture and hard and soft surfaces; on vistas along streets and spaces between buildings. Not all elements of a Conservation Area though contribute to its significance and their replacement and alterations can represent opportunities for the enhancement of the area, including enhancement by development of high quality and innovative design. The emphasis is to guide and control development, not to prevent it.
- 2.283** The character of a Conservation Area can heavily depend on the cohesiveness of form and consistency of materials and detailing of buildings. The alteration or loss of one individual feature to one building may appear minor in the wider context, but incrementally such small changes can erode the special interest of an area. The Council has made Article 4 Directions to a number of Conservation Areas to protect distinctive features.
- 2.284** The Council supports improvements to the energy performance of listed buildings and buildings in Conservation Areas. The suitability of thermal improvement measures needs to be carefully considered with regard to the effect on the appearance and characteristics of the building. External wall insulation, for example, can markedly alter the appearance of a building, which makes other measures such as roof insulation, draught-proofing, energy efficient lighting better and more suitable investments for reducing energy use. Detailed advice is available from English Heritage and the Council's conservation team.
- 2.285** The best way of securing the upkeep of historic buildings and areas is to keep them in active use. For the great majority this must mean economically viable uses if they are to survive. New and even continuing uses will often necessitate some degree of adaptation. The range

and acceptability of proposed uses must therefore be a major consideration when the future of listed buildings is in question. The aim should be to identify the optimum viable use that is compatible with the fabric, interior and setting of the historic building.

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

#### What is the aim of this policy?

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

#### DM Policy 37

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

###### A. General principles

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

###### B. Locally listed buildings

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

###### C. Areas of special character

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

**DM Policy 37**

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**D. Non designated heritage assets of archaeological interest**

8. The Council will ensure that non designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be considered subject to the policies for designated heritage assets.
9. The conservation, protection and enhancement of the archaeological heritage of the borough will be promoted through:
  - a. requirements to assess and plan for the archaeological implications of development proposals that may affect the archaeological heritage of a site which may require preliminary archaeological site evaluations. Proposals on sites within areas of archaeological priority as shown on the Policies Map should be accompanied by an evaluation. Evaluations should be commissioned from professionally qualified archaeological organisations or consultants.
  - b. the location and design of developments should avoid archaeological remains in order to ensure these remain preserved in situ, with public access and display.
  - c. where permanent preservation is not justified, the remains are investigated, recorded and subsequently published by a recognised archaeological organisation prior to the start of development.
  - d. Where remains unexpectedly come to light, seeking ensure their preservation or their recording in consultation with the developer.

**Justification**

- 2.286** DM Policy 37 implements Core Strategy Policy 16, which sets out a framework for the protection of the borough's non-designated heritage assets. Core Strategy Policy 16 delivers the approach in London Plan policies 7.8 (Heritage assets and archaeology), and 7.9 (Heritage-led regeneration).
- 2.287** The policy is consistent with Section 12 of the NPPF, and the Historic Environment Planning Practice Guide to PPS5 which provides guidance on assessing heritage assets.
- 2.288** There are a number of buildings and groups of buildings of local historic, architectural or townscape interest which greatly contribute to the borough's distinctiveness and sense of place, but may not qualify as designated heritage assets. The Council has recognised their importance and value as heritage assets by adopting them as locally listed buildings and, resources permitting, has an ongoing programme of identifying new additions to the list. Buildings and structures will also be added to this list during the development process when applications for planning permission are received and buildings and structures are assessed for their heritage value.
- 2.289** There are also many areas in the borough which possess sufficient architectural, townscape and environmental quality to make them of local value. The Council is currently working on compiling a list of such areas and establishing criteria for their adoption. Similar to conservation areas, areas of special local character will be identified based upon their architectural or townscape merits, but they will also include other elements of the historic

environment such as locally important archaeology, landscapes or areas of distinct topography e.g. Sydenham Hill. Some of these areas may qualify for conservation area designation in the future.

- 2.290** In line with the requirements of the NPPF the effect of development proposals on the particular significance of such non-designated heritage assets will be taken into account. The Council wishes to encourage the retention and restoration of buildings contributing to the character of these areas and may develop supplementary planning guidance (SPD) and, if necessary, make Article 4 Directions to prevent their demolition, or development that would harm the area's particular significance. The existing list of Locally Listed Buildings will be added to when necessary or as a result of assessments arising from development proposals.
- 2.291** The Council wishes to protect its archaeological heritage and to ensure that any important remains are preserved and in suitable cases effectively managed as an educational, recreational and tourism resource. Archaeological remains are a community asset and provide a valuable picture of the history and development of the local area as well as London as a whole. They are a finite and fragile resource, vulnerable to modern development. The requirements of the policy will generally come into force when extensive redevelopment is proposed involving excavation or foundation work which may disturb or expose relatively undisturbed remains below the level of current building development. Appendix 3 explains the significance of the various Areas of Archaeological Priority shown on the Policies Map and gives an indication of the type and age of archaeological remains that might be discovered.

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

### What is the aim of this policy?

- 2.292** The aim of this policy is to ensure that proposals which lead to substantial harm or demolition are fully justified and that all options are explored to avoid unnecessary harm to or loss of heritage assets.

### DM Policy 38

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

1. Heritage assets are an irreplaceable resource and the greater the importance of the heritage asset, the greater the weight will be given to its conservation. Proposals for the demolition of, or substantial harm to a heritage asset will require clear and convincing evidence and will only be considered under exceptional circumstances for Grade II listed buildings, parks or gardens. Substantial harm or loss to designated heritage assets of the highest significance, including scheduled monuments and Grade I and II\* listed buildings, will only be considered under wholly exceptional circumstances.
2. Proposals for demolition or substantial harm to designated heritage assets will be refused unless it can be demonstrated that these are necessary to achieve substantial public benefits that outweigh the harm or loss, and that there is no practical way of realising the benefits without demolishing the building or causing substantial harm.
3. Where applicants cannot demonstrate substantial public benefits all of the following will be taken into account in order to justify the loss or harm:
  - a. the significance of the asset, architecturally, historically, contextually, and any communal value. The greater the significance of the heritage asset, the greater the weight will be given to its conservation.
  - b. the nature and condition of the asset and the economic viability of its repair and re-use
  - c. the adequacy of marketing efforts made that would enable its conservation in the medium term
  - d. the adequacy of efforts to find alternative sources of funding or some form of charitable or public ownership
  - e. the benefits of bringing the site back into use.
4. Development proposals involving substantial structural alterations to a heritage asset need to demonstrate, by way of a structural survey and methodology statement, that the alterations proposed can be carried out without unacceptable risk to the integrity and significance of the asset.
5. Where demolition is proposed on the grounds that a building's condition is beyond repair, a structural survey will always be required. This should be prepared by a suitably qualified conservation professional and must describe, explain and illustrate the structural problems, and discuss repair options.

**DM Policy 38**

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6. Where demolition or substantial harm is proposed on the ground that repair is not economically viable, the Council will require full supporting evidence, for example:
  - a. a valuation of the existing building and site
  - b. a full survey identifying the repairs required
  - c. development costs, including a costed schedule of repairs
  - d. an estimate of the value of the repaired property, including potential yields
  - e. evidence that the property has been marketed for a reasonable period at a price reflecting its condition.
  
7. Where demolition is sought on grounds of redundancy, applicants will be required to demonstrate by way of a marketing exercise that no viable use for the site can be found. The timing, period and means of marketing may be set by the Council and will depend on the type of building and marketing conditions. The Council will consider in its assessment the asking price, the property's condition, the extent of land that was offered with the building, and the terms of lease.
  
8. Demolition of a heritage asset will only be considered in conjunction with a full planning application for a replacement development.

**Justification**

- 2.293** DM Policy 38 implements Core Strategy Policy 16, which sets out a framework for the protection of the borough's designated and non-designated heritage assets. Core Strategy Policy 16 delivers the approach in London Plan Policies 7.8 (Heritage assets and archaeology) and 7.9 (Heritage-led regeneration).
- 2.294** The policy is consistent with Section 12 of the NPPF, and the Historic Environment Planning Practice Guide to PPS5 which provides guidance on assessing and protecting heritage assets.
- 2.295** Heritage assets are an irreplaceable resource. As custodians of our past we have a responsibility to ensure that proposals for substantial harm or demolition are carefully weighed and all options are explored so as not to deprive future generations of the enjoyment of our built heritage we enjoy today. Given their irreversible nature, demolition and destruction should be seen as a last resort after every option to secure a viable future for the asset has been exhausted.
- 2.296** Substantial harm to an asset may be caused by direct physical intervention, by unsympathetic extensions, or by development within the setting that may affect the way in which an asset is appreciated. The fabric will always be an important part of an asset's significance, and where substantial structural alterations are proposed, applicants may be required to demonstrate by way of a structural survey and methodology statement that no unacceptable risk to the integrity of the building and loss of fabric will occur. These requirements may also apply to alterations that appear uncontroversial but which have the potential to compromise the structural integrity of the building and lead to substantial harm if not properly executed, for example, the introduction of basements.



- 2.297** The purpose of marketing is to demonstrate that no viable use for the asset can be found. The Council is keen to ensure that these efforts have been genuine and given the best chance of succeeding. If market conditions are poor, applicants may be advised to 'mothball' the asset until conditions have improved to the point when a negative response can be reasonably ascribed to a genuine lack of interest in the asset itself rather than to market conditions.
- 2.298** The spatial policies in the Core Strategy underpin this approach by seeking to preserve local character and the historic character and significance of all the spatial areas in the borough. Core Strategy Policy 16 seeks to ensure that the value and significance of the borough's heritage assets and settings will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.
- 2.299** This approach is supported by London Plan Policy 7.8 (Heritage assets and archaeology) which states that development should 'identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate and that boroughs should seek to maintain and enhance the contribution of these assets'.

### 2.39 Telecommunications

#### What is the aim of this policy?

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

#### DM Policy 39

##### Domestic satellite dishes and telecommunications equipment

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

##### Radio and telecommunications masts and infrastructure

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

**Justification**

**2.301** DM Policy 39 is consistent with the NPPF (Section 5, paragraphs 42 - 46).

**2.302** The Council wishes to facilitate telecommunications development, including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the development on valued features of the borough's environment is minimised and the new development meets all relevant safety guidelines and safeguardings.

## 2.40 Public conveniences

### What is the aim of this policy?

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

### DM Policy 40

#### Public conveniences

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

### Justification

- 2.304** This Policy is consistent with Core Strategy Strategic Objective 11 which supports the provision of new community facilities (see Appendix 1) and Core Strategy Policy 19. There is a need for the provision of public conveniences in developments that attract large numbers of people. This includes, as a minimum, retail development over 1,000 square metres gross floorspace and entertainment uses of 500 square metres gross floorspace.
- 2.305** Inclusive and accessible toilet provision is essential to meet the needs of residents, workers and visitors. Without these facilities particular groups like people with disabilities, older people, carers with children and tourists may be deterred from spending long periods of time at key locations, such as in town centres. A lack of toilets can therefore affect the economy of an area. It can also impact on health, as a lack of facilities deters people from walking and cycling.
- 2.306** The Council will also seek to negotiate for the provision of these facilities within existing buildings.

## 2.41 Innovative community facility provision

### What is the aim of this policy?

**2.307** The aim of this policy is to promote the development of innovative solutions to the provision of community facilities. Such facilities lie at the heart of neighbourhoods and are important in promoting good social cohesion and opportunities to meet, socialise, learn and develop interests and skills. In terms of this policy, community facilities refer not only to community halls and centres, but to all other spaces where people can meet, such as rooms above shops and pubs, as well as sports and leisure space. It does not include places of worship that are dealt with separately by DM Policy 44, but may include community halls or other spaces that are linked to places of worship.

### DM Policy 41

#### Innovative community facility provision

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

### Justification

**2.308** The protection of existing community facilities and the promotion of new provision is comprehensively dealt with by the NPPF (paragraph 70), the London Plan Policy 3.16 and Core Strategy Strategic Objective 11 (see Appendix 1), and Core Strategy Policy 19. The Infrastructure Delivery Plan (IDP) identifies a wide range of existing community facilities in the borough, numbering over 90, including community centres, community halls, offices for voluntary organisations and places of worship (with community halls). As a minimum, these facilities and any new equivalent facilities are protected by the existing wider policy context. As part of the existing Section 106 planning obligations process and the emerging Community Infrastructure Levy process, the Council will seek to continue supporting the maintenance and development of individual community facilities where it is appropriate.

**2.309** Alongside the more formal and traditional provision of community space in halls and centres, the Council are aware of local communities using opportunities to meet in many informal locations, such as pubs, cafés, schools, industrial units and other locations. DM Policy 41 encourages the use of innovative alternative meeting space on condition that it provides a safe and appropriate environment for the activity taking place. Provision and access to good quality community facilities has a direct positive impact on human health and wellbeing and will assist in the implementation of the Core Strategy and London Plan Policies identified above as well as the recommendations of the Infrastructure Delivery Plan.

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

- 2.311** The Portas review of high streets in 2012 stated that vacant retail units could be utilised temporarily for other uses, including community uses, until a retail occupier could be found. Following this example, practical opportunities for the temporary use of inside and outside space that can be reasonably utilised to deliver community space will be encouraged. Potential sources of space could include vacant units usually used for retail, commercial, other business or infrastructure, and empty or under utilised brownfield land.
- 2.312** DM Policy 20 details the Council approach towards pubs in the borough. Part of the policy includes consideration of the role the public house plays in the provision of space for community groups to meet and whether the loss of such space would contribute to a shortfall in provision. Consideration of the value and opportunities for the encouragement of community pub space is included within both DM Policy 41 and DM Policy 20.

## 2.42 Nurseries and childcare

### What is the aim of this policy?

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

### DM Policy 42

#### Nurseries and childcare

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

### Justification

- 2.314** The Council do not propose to deliver nursery provision directly, but recognise the need for provision by private, community and other voluntary sources. A representative level of provision is required across the borough to support working families.
- 2.315** The London Plan Policy 3.16 includes nurseries as part of social infrastructure and encourages local authorities to ensure that there is adequate provision of facilities. The Core Strategy Strategic Objective 11 (see Appendix 1), and Core Strategy Policy 19 respond to this need by stating that the Council will ensure provision of a range of education and community facilities in the borough. DM Policy 42 sets out how the Council seek to implement the Core Strategy by detailing the criteria which applications for new nursery facilities will be required to address. The Council will only allow facilities where it can be demonstrated that the criteria listed have been satisfactorily met.
- 2.316** The Childcare Sufficiency Assessment, 2008, for Lewisham identifies a number of wards with a deficiency in the amount of childcare places available. These are Blackheath, Lee Green, Rushey Green, Forest Hill and Sydenham. DM Policy 42 will support an increased level of provision in these areas, or the appropriate areas as highlighted by any further assessment of provision.
- 2.317** Applicants should seek to find the most appropriate location for new nursery provision in an area. Existing vacant D uses are considered most appropriate and only after this should existing C3 uses be considered. In most circumstances, detached C3 use will be seen as more appropriate for conversion to a nursery than semi-detached, which in turn is more appropriate than terraced housing. End of terrace locations will likely be treated the same as semi-detached properties. This approach will assist in protecting residential amenity.

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



## 2.43 Art, culture and entertainment facilities

### What is the aim of this policy?

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

### DM Policy 43

#### Art, culture and entertainment facilities

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

### Justification

- 2.320** The NPPF (paragraph 70) requires local authorities to plan positively for the provision of community facilities, including cultural buildings and states (paragraph 156) that cultural facilities should be treated as a strategic priority for local plan making. This approach is supported by the London Plan through Policies 4.6 and 3.16.
- 2.321** The Core Strategy sets out the strategic context for art, cultural and entertainment facilities in Strategic Objective 11 (see Appendix 1) and Core Strategy Policy 19, which states that the Council will work with its partners to protect and enhance art, culture and entertainment facilities. Examples of such facilities in the borough include the Catford Broadway, Albany and Brockley Jack Theatres, Rivoli Ballroom, Laban Dance Studios, various galleries and showrooms and neighbourhood initiatives such as those around Deptford / New Cross.
- 2.322** DM Policy 43 supports the implementation of the Core Strategy and adds to its approach by detailing when new and/or redeveloped individual facilities may be acceptable. New facilities will be encouraged and large scale uses directed towards town centres or other locations with good accessibility and where local amenity is not harmed.
- 2.323** The Council will only allow the loss of a facility where a suitable replacement facility can be supplied on-site or nearby or in a suitable location that is forming a new community hub. Re-developed facilities must still meet the need to have good accessibility, including meeting all relevant accessibility and mobility standards, and be sited where there is no detriment to local amenity.
- 2.324** The policy supports the Lewisham Arts Strategy 2009 - 2015 which seeks to develop Lewisham's identity as a vital, creative place to live, work and learn through the provision of high quality creative destinations and the support and encouragement of the cultural and creative sector.

## 2.44 Places of worship

### What is the aim of this policy?

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

### DM Policy 44

#### Places of worship

1. The Council's preferred locations for the development of public places of worship are the network of major and district town centres as defined in Core Strategy Policy 6.
2. Proposals for development in the major and district town centres and all other areas will only be considered in locations that are:
  - a. highly accessible to users through public transport and cycling and walking routes and
  - b. able to source an adequate level of parking for users, without negatively impacting on local street parking or the accessibility of other local services.
3. All applications for places of worship will be required to:
  - a. demonstrate they are not causing a detrimental effect to employment or future employment space
  - b. demonstrate that there will be no detrimental effect on local amenity through noise, hours of operation or any other environmental impacts
  - c. provide a travel plan to show that the points detailed in Point 1 of this policy and other transport issues can be mitigated and
  - d. be delivered to the highest design standards.

### Justification

- 2.326** DM Policy 44 is consistent with the NPPF (paragraph 70), which requires planning authorities to plan positively for the provision and use of community facilities including places of worship. The policy also delivers the London Plan Policies 3.1 (Ensuring equal life chances for all) and 3.16 (Protection and enhancement of social infrastructure) which require local authorities to consider where provision should be made, in particular in relation to growing populations.
- 2.327** The Council believe that the most appropriate location for places of worship is in the network of major and district town centres as is defined in Core Strategy Policy 6. Such locations are the most sustainable in terms of transport accessibility and offer existing public parking arrangements. Residential amenity and employment locations will also be protected by utilising town centre sites. Other locations outside of the network of town centres may be considered if the criteria outlined in the policy can be satisfactorily met.
- 2.328** It is important that proposals for faith premises are located in highly accessible areas to ensure that they allow access not only by car, but also by cycling, walking and public transport. Evidence of existing premises demonstrates that even in accessible locations, faith premises generate significant car travel and associated parking requirements. Applicants should

therefore ensure that the level of on / off site parking provided is adequate to minimise the impact on local street parking and public parking availability. The effect of car movements and parking will need to be assessed through a travel plan.

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

## Delivery Implementation and Monitoring

3.1 This section sets out how the Council will deliver the DMLP policies and how they will be monitored to ensure Council objectives are being met.

### Delivery

3.2 The DMLP has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and is considered sound. This means the DMLP has been:<sup>(22)</sup>

- Positively prepared – the plan has been prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
- Justified – the plan is the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- Effective – the plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities and
- Consistent with national policy – the plan enables the delivery of sustainable development in accordance with the policies in the Framework.

3.3 As the DMLP implements the Core Strategy, the Council will continue to ensure it is delivered in accordance with Section 9 of the Core Strategy . Specific aspects associated with the DMLP will include fostering the development management process by ensuring continued partnership working (internal and external) and the Council taking a role as coordinator. The DMLP provides clarity and consistency for applicants and others involved in the development management process. This will be enhanced by pre-application discussions between applicants and the Council.

3.4 The Council's approach to planning obligations is outlined in a separate SPD and will be used where appropriate. This provides a degree of certainty for the Council and the developer. Obligations sought will contribute to delivering the policies outlined in this document. The Council will introduce a Community Infrastructure Levy (CIL) by 2014.

### Monitoring

3.5 The DMLP along with other Local Plans will be monitored to ensure the delivery of strategic objectives. This allows continuity in the Plan-Monitor-Manage approach used by the Council. Progress on the implementation of the policies contained in the Core Strategy will be reported in the Annual Monitoring Reports (AMR). Many of the indicators and targets already included in the AMR will also be relevant to monitor the policies in the DMLP, including those shown below:

Table 3.1 Annual Monitoring Report Indicators

Annual Monitoring Report Indicator	Relevant DMLP policy
Indicator 7: Increase supply of affordable homes	Policy 7
Indicator 8: Mix in housing tenure	Policy 7
Indicator 13: Ensure there is sufficient employment land available and	Policies 9 and 10

22 Paragraph 182, NPPF

Annual Monitoring Report Indicator	Relevant DMLP policy
Indicator 14: Release of industrial land to accommodate B uses and mixed uses	Policies 9 and 10
Indicator 19: Number of training and employment spaces secured through planning obligations	Policy 11
Indicator 23: Amount of completed retail, office and leisure development (overall and in town centres)	Policies 11 and 13
Indicator 24: Amount of employment floorspace for town centre uses	Policies 11 and 13
Indicator 25: Percentage of non-retail uses in primary shopping frontages	Policies 14, 15 and 16
Indicator 26: Energy generated through renewable sources	Policy 22
Indicator 31: Compliance with BREEAM	Policy 22
Indicator 32: Number of completed living roofs and walls	Policy 24
Indicator 33: Air pollution levels	Policy 23
Indicator 39: Change in areas and populations of biodiversity importance	Policy 24
Indicator 46: Percentage of non-residential development complying with car parking standards	Policy 29
Indicator 49: Number of completed car-free or car-limited developments	Policy 29
Indicator 52: Number of new cycle facilities	Policy 29
Indicator 53: Number of car clubs and bays in the borough	Policy 29
Indicator 54: Electric car charging points	Policy 29
Indicator 57: Number of appeals allowed following refusal on design grounds	Policies 25, 27, 30, 32, 35
Indicator 58: Number of listed buildings and scheduled monuments on the 'at risk' register	Policies 36 and 38
Indicator 59: Number of conservation areas covered by up-to-date Conservation Area appraisals and management plans	Policies 36 and 38
Indicator 61: Gains and losses of community and recreational facilities completed	Policies 40, 41, 42, 43 and 44
Indicator 62: Delivery of identified social infrastructure	Policies 40, 41, 42, 43 and 44

- 3.6** In order to monitor the remainder of the DMLP policies, the indicators and targets in future versions of the AMR will be expanded. A range of new indicators and targets will be devised that monitor (where appropriate) the delivery, provision, change of use, loss, type, amount and/or location of different types of housing, a range of non residential uses and developments with specific environmental considerations.

### Use of conditions

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

### Temporary uses

- 3.8** The Council will continue to support the temporary use of vacant or underused space where it is appropriate to do so, is to the benefit of local communities and is in accordance with all other parts of the Local Plan and the Use Classes Order. Opportunities for the innovative temporary use of space, particularly in relation to arts and culture, community facilities, shopping centres and open spaces could provide important local services and contribute to the vitality and viability of centres in the borough.
- 3.9** Arts and cultural uses and areas contribute to the economic and social success of an area and can play an important role in place shaping. In line with London Plan Policy 4.6, the Council will support the temporary use of vacant buildings for performance and creative work.
- 3.10** Community facilities can be suitable temporary uses of vacant or unused inside and outside space. These facilities lie at the heart of neighbourhoods and are important in promoting good social cohesion and opportunities to meet, socialise, learn and develop interests and skills. The development of community facilities should be in line with DM Policy 41 Innovative community facility provision.
- 3.11** The Council will continue to monitor vacancy rates in town centres and shopping parades as rises in vacancies can reflect economic uncertainties, can degrade the environment and may deter future investment. To avoid long term vacancies and in order to encourage new and innovative uses in town centres, the Council will, where appropriate, support temporary uses that provide active frontages at ground floor. Appropriate instances include where the overall appearance and vitality and viability of the town centre can benefit and a range of uses could include retail, galleries, music events, cultural displays and other uses which benefit the community.
- 3.12** Vacant and underused sites may be appropriate to use as temporary open space. This would provide the public with an additional recreational resource and contributes to the improved appearance and amenity of an area.

## Appendix 1

### Core Strategy Strategic Objectives

#### Regeneration and growth areas

##### Core Strategy Objective 1: Physical and socio-economic benefits

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

#### Providing new homes

##### Core Strategy Objective 2: Housing provision and distribution

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

##### Core Strategy Objective 3: Local housing need

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

#### Growing the local economy

##### Core Strategy Objective 4: Economic activity and local businesses

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

- c. ensuring the future growth of the local economy by the mixed use redevelopment of identified industrial sites that require extensive physical investment and improvement
- d. developing Lewisham town centre to promote it to a Metropolitan town centre by 2026, and maintaining the status of Catford as a Major town centre, with a focus on quality design and development
- e. protecting and enhancing the district shopping centres, local shopping centres, parades and the range of farmers' and street markets, as providers of sustainable local shopping facilities and services to continue to support basic community needs.

## Environmental management

### Core Strategy Objective 5: Climate change

- 1.6** The Council with its partners will take action to ensure that climate change is adapted to and mitigated against, including those measures necessary to create a low carbon borough and reduce carbon emissions by:
- a. promoting resource and water efficiency
  - b. maximising generation and use of renewable energy and locally distributed energy, particularly for major development sites
  - c. building to high standards of sustainable design and construction
  - d. reducing waste generation
  - e. supporting environmental protection and enhancement including establishing ecological networks
  - f. minimising the environmental impacts of development including water, noise and air pollution.

### Core Strategy Objective 6: Flood risk reduction and water management

- 1.7** The Council with its partners will take action to protect the borough from the risk of flooding and reduce the effects of flooding from all sources, including the Thames, Ravensbourne, Quaggy and Pool rivers, and manage improved water quality by:
- a. using the PPS25 sequential and exception tests to allocate land for development
  - b. requiring river restoration and appropriate flood defences as part of development proposals, where appropriate
  - c. ensuring appropriate local flood defences are maintained and provided for and
  - d. requiring sustainable urban drainage systems in new development, wherever feasible.

### Core Strategy Objective 7: Open spaces and environmental assets

- 1.8** The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by:
- a. protecting all open space including Metropolitan Open Land
  - b. protecting Sites of Importance for Nature Conservation and supporting and promoting local biodiversity
  - c. requiring green roofs and walls where appropriate
  - d. implementing the Street Tree Programme
  - e. improving the quality of, and safeguarding access to, all public open space
  - f. providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and river and waterways network, and the Thames Path.



**Core Strategy Objective 8: Waste management**

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

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

- 1.10** Provision will be made to ensure an accessible, safe, convenient and sustainable transport system for Lewisham that meets people's access needs while reducing the need to travel and reliance on the private car. This will:
- a. promote choice and better health
  - b. facilitate sustainable growth in the key localities for regeneration and growth (Lewisham, Catford, Deptford, New Cross)
  - c. improve integration, accessibility and connectivity within the borough and the London sub-region.
- 1.11** The Council will ensure that transport and accessibility within the borough:
- a. provides for a system of walking and cycling routes and strong links to town centres and public open space, including the Waterlink Way, and promotes the implementation of greenways
  - b. improves accessibility in the Evelyn, Whitefoot, Bellingham and Downham wards
  - c. facilitates the movement of freight while minimising the adverse impacts of traffic, noise and emissions
  - d. delivers key infrastructure projects including Thameslink, the 'lower h' road at Lewisham, removal of the Kender gyratory system and safeguarding provision for the Surrey Canal station as part of the London Overground network.

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

- 1.12** Lewisham's distinctive local character will be protected through sensitive and appropriate design, in particular those areas requiring managed change and protection such as the borough's heritage assets and their settings, local rivers and landscape, and yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean:
- a. ensuring that new development achieves high standards of urban design and residential quality, and contributes to a sense of place and local distinctiveness informed by an understanding of the historic context
  - b. ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment
  - c. preserving or enhancing the condition and historic significance of the borough's heritage assets and their settings and the other identified elements of the historic environment.

**Core Strategy Objective 11: Community well-being**

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

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

## Appendix 2

### Sustainability Objectives

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

#### Economic

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

#### Environmental

3. To minimise the production of waste across all sectors and increase reuse, waste recovery and recycling rates
4. To use and manage the consumption of natural resources in a sustainable manner
5. To protect and enhance the borough's open spaces
6. To conserve and enhance the borough's natural habitats, biodiversity, flora and fauna, and increase opportunities for people to access nature in all areas of the borough
7. To improve air quality and reduce noise and vibration
8. To reduce car travel and improve accessibility by sustainable modes of transport
9. To mitigate and adapt to the impact of climate change
10. To reduce and manage flood risk
11. To reduce land contamination and safeguard soil quality and quantity
12. To maintain and enhance landscapes and townscapes
13. To conserve and enhance heritage assets and use in the creation of sustainable places

#### Social

14. To provide sufficient housing of appropriate mix and tenure and the opportunity to live in a decent home
15. To improve the health and well-being of the population and reduce health inequalities
16. To address deprivation, promote social inclusion and ensure equitable outcomes for all communities
17. To provide for the improvement of education, skills and training

18. To enhance community safety by reducing crime, anti-social behaviour and the fear of crime
19. To improve accessibility to leisure and cultural facilities, community infrastructure and key local services

Table 1 Appendix 2 illustrates how the objectives of the Sustainability Appraisal relate to the emerging DMLP objectives. The objectives are as follows:

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

Table 1 Appendix 2 Compatibility of the Development Management Local Plan and Sustainability Appraisal objectives

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

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

## Appendix 3

### Areas of Archaeological Priority

Source: Greater London Archaeological Service

#### APA1 Thames alluvial floodplain

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

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

#### APA2 Thames and Ravensbourne terrace gravels

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

#### APA3 Watling Street and the 'Deep-ford'

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

#### APA4 London-Lewes Road

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

#### APA5 Bell Green

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

#### APA 6 Lewisham and Catford/Rushey Green

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

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

Late Saxon alien priory were unusual, yet by the 10th century a monastic cell existed at Lewisham, held by St. Peter's of Ghent as part of its main estate at Greenwich. The Domesday account of Lewisham, probably refers to the Priory's estate in both Greenwich and Lewisham, it is clear that the waters of the Ravensbourne were already powering a number of mills. The early estate was probably located in the vicinity of the medieval parish church dedicated to St Mary (Listed Grade II\*) on Lewisham High Street. During the 18th century Lewisham High Street was lined with fashionable houses of the merchant classes.

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

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

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

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

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

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

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



The site of the Royal Naval Dockyard, now known as Convoy's Wharf, is today a large wharf with warehouse facilities owned by News International Ltd. Extant remains of the Dockyard include the shed constructed c. 1846/47 to cover Nos. 2 and 3 slipways (Listed Grade II), the early 18th century Master Shipwrights Apartment (Listed Grade II) erected in 1700, river walls which show the location of the entrances to the slips and docks and the timber slipways exposed on the foreshore. However, by far the greater part of the Dockyard survives as buried archaeological structures.

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

### **APA8 Deptford Creek**

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

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

### **APA 9 Upper Deptford**

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

A recent RCHME survey has assessed the survival and character of pre-1800 houses. A type of urban vernacular housing, in which timber framed construction methods were employed later than is common, has been found to survive extensively within the area of Deptford High Street, with other examples occurring along Deptford Broadway and Tanners Hill. The design of these buildings provides significant evidence of the social development of Georgian London, which has implications for towns

in England and in North America. In addition to the extant historic fabric of the buildings, excavation has revealed the survival of associated pits and wells to the rear of the properties and it has been found that cellars may survive even when all trace of the superstructure has been lost.

#### **APA 10 Deptford – the Broadway and Tanners Hill**

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

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

#### **APA 11 Lee**

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

#### **APA 12 Sydenham**

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

#### **APA 13 Southend**

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

#### **APA 14 New Cross**

The name is derived from the sign of the Golden Cross carried by a well-known medieval coaching house on Watling Street. Recent excavation on New Cross Road has also revealed that sometime after purchasing the manor estate in 1614, the Haberdashers Company established a brickworks, possibly supplying the demand which followed the Fire of London. Counter Hill House built in the

18th century was a boarding school between 1792 and 1837 before making way for Goldsmiths College (Listed Grade II). The site of the Cromacks nursery is evidence of the importance of local market gardens which supplied expanding populations of Deptford and Southwark during the 18th century.

#### **APA 15 Perry Street**

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

#### **APA 16 Brockley Jack**

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

#### **APA 17 Brockley Priory**

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

#### **APA 18 Blackheath and Blackheath Village**

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

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

#### **APA 19 The Manor House, Lee**

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

#### **APA 20 Beckenham Place Park**

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

**APA 21 Wells Park**

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

## List of Superseded Lewisham UDP policies

UDP policy	Policy name	Proposed replacement DM Policy (or London Plan Policy, NPPF reference)
STR URB 1	The built environment	NPPF Section 7, LP Policy 7.1 - 3, CS Policy 15
STR URB 4	Environment in regeneration areas	CS Policies 8, 9, 10, 11, 12
STR.ENV.PRO 3	Energy and natural resource conservation	CS Policies 7, 8 and DM Policy 32
URB1	Development sites and key development sites	DM Policy 30
URB3	Urban design	DM Policy 30
URB6	Alterations and extensions	DM Policy 31
URB8	Shopfronts	DM Policy 19
URB9	Signs and hoardings	DM Policy 19
URB10	Roller grilles and shutters	DM Policy 19
URB11	Masts, satellite dishes and telecommunications equipment	DM Policy 39
URB12	Landscape and development	DM Policy 25
URB13	Trees	DM Policy 25
URB14	Street furniture and paving	DM Policy 25
URB16	New development, changes of use and alterations to buildings in conversion areas	DM Policy 36
URB20	Locally listed buildings	DM Policy 37
URB24	Thames Policy Area	DM Policy 34
URB29	Art in public spaces	DM Policy 35
OS2	Land close to Metropolitan Open Land	LP Policy 7.17, CS Policies 12, 18,
OS7	Other open space	NPPF Paragraph 74, LP Policy 7.18, CS Policy 12
OS9	Temporary open space	Deleted (Info in DM Implementation Chapter)
OS15	Historic Parks, Gardens and Landscapes	DM Policy 36
OS16	World Heritage Buffer Zone	CS Policy 16
ENV.PRO2	Special waste and hazardous substances	CS Policy 3, Environmental Permitting (England and Wales) Regulations 2010
ENV.PRO5	Waste management facilities	CS Policy 3
ENV.PRO9	Potentially polluting uses	NPPF Paragraph 120

## Lewisham UDP policies superseded policies

UDP policy	Policy name	Proposed replacement DM Policy (or London Plan Policy, NPPF reference)
ENV.PRO10	Contaminated land	DM Policy 28
ENV.PRO11	Noise generating development	DM Policy 26
ENV.PRO12	Light generating development	DM Policy 27
ENV.PRO13	Aggregates	LP Policy 5.20, Local Aggregate Assessment for London 2013, June 2014
ENV.PRO17	Management of the water supply	CS Policies 8, 10 and implementation of Sustainable Urban Drainage Systems and Surface Water Management Plans
HSG1	Prevention of loss of housing	DM Policy 2
HSG4	Residential amenity	DM Policy 30
HSG5	Layout and design of new residential development	DM Policy 32
HSG7	Gardens	DM Policies, 30, 31, 32, 33
HSG8	Backland and In-fill development	DM Policy 33
HSG9	Conversion of residential property	DM Policy 3
HSG10	Conversion of office and other commercial space to residential accommodation	DM Policy 4
HSG11	Conversion of space above shops to residential accommodation	DM Policy 32
HSG12	Residential extensions	DM Policy 31
HSG18	Special needs housing	DM Policy 5
TRN24	Off-street parking for residential conversions	DM Policy 29
TRN27	Dual use of private car parks	Deleted (replaced for Lewisham town centre in LTCLP Policy 20)
TRN28	Motorcycle parking	DM Policy 29
STC1	The shopping hierarchy	CS Policy 6
STC2	Location of new stores (the Sequential Test)	DM Policy 13
STC4	Major and District Centres - core shopping areas	CS Policy 6, DM Policy 14
STC5	Major and District Centres - non core shopping areas	DM Policy 14
STC6	Major and District Centres - core shopping areas	DM Policy 14

UDP policy	Policy name	Proposed replacement DM Policy (or London Plan Policy, NPPF reference)
STC7	Local shopping areas	DM Policy 15
STC8	Local shopping parades and corner shops	DM Policy 16
STC9	Restaurants, A3 uses and take away hot food shops	DM Policies 17 and 18
STC10	Mini cab or taxi offices	DM Policy 21
STC12	Mixed use development	DM Policies 9, 11 and Lewisham Town Centre Local Plans
LCE1	Location of new and improved leisure, community and education facilities	LP Policy 3.16, CS Policy 19 and DM Policies 41, 42, 43, and 44
LCE2	Existing leisure and community facilities	CS Policy 19, LP Policy 3.16 and NPPF Paragraph 74
LCE3	Educational sites and playing fields	Site Allocations Local Plan, LP Policies 3.16, 3.19 and NPPF Paragraph 74
LCE6	Artificial grass pitches	DM Policy 24
LCE8	Public conveniences	DM Policy 40

## Appendix 5

### Glossary

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

- Social rented housing is owned by local authorities and private registered providers, (as defined in Section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Community Agency.
- Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing.
- Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).
- Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

**Community Infrastructure Levy (CIL)** A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area to pay for infrastructure projects identified by the Local Authority and/or the Mayor of London.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**Local Shopping Parade and Corner Shop** A local shopping parade is a group of at least four contiguous shops and may continue over breaks such as streets or railways. A corner shop is a shop which is located outside of the Major centres, District centres, Neighbourhood Local centres and Local Shopping Parades. These parades and shops should provide for the day to day needs of local residents.

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

**Localism Act 2011** National legislation from central government, partly aimed at improving the planning process and enhancing community involvement in it. Visit [www.communities.gov.uk](http://www.communities.gov.uk) to find out more.

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

**Main Town Centre Uses** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

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

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

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

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

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

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

**North Facing** North facing windows are generally defined as any windows within 45 degrees of due North.

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

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

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

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

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

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

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

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

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

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

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

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

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

**Shell and Core** A commercial development where all internal finishes and services are left out, for provision by the tenant.

**Specialist accommodation for older people** Some residents living in the borough require specialist accommodation to meet their social, physical, mental and/or health care needs. Specialist accommodation can be divided into three main types:

- Sheltered housing is self contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has self contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency.
- Extra care accommodation (sometimes also referred to as close care, assisted living, very sheltered or continuing care housing): Self-contained residential accommodation and associated facilities designed and managed to meet the needs and aspirations of people who by reason of age or vulnerability have an existing or foreseeable physical, sensory or mental health impairment. Each household has self-contained accommodation and 24 hour access to emergency support. In addition extra care accommodation includes a range of other facilities such as a residents lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers. The exact mix of facilities will vary on a site by site basis. Some domiciliary care is provided as part of the accommodation package, according to the level of need of each resident. Extra care housing aims to create a balanced community, bringing together a balanced proportion of people with different levels of care needs.
- Care homes (including end of life/hospice care and dementia care): Nursing or residential care home providing non self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. Accommodation is not self-contained: meals and personal services are routinely provided to all residents. Communal facilities are likely to include a dining room and residents lounge. There will be a scheme manager and in house care team who provide a consistent presence. Personal or nursing care is a critical part of the accommodation package. Care homes include 24 hour medical care from a qualified nurse.

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

**Single Family House** Self-contained house occupied by a single family.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



## Appendix 6

### Schedule of Important Local Views and Landmarks protected by Core Strategy Policy 17 and shown on the Policies Map

Map Ref	Site Ref	Site Address	Implementation Details
B7	LL6	Horniman Museum (front facade), Forest Hill	Preserve views of this important local landmark by ensuring that new development does not obscure it.
B7	LV1	Horniman Gardens Forest Hill	Maintain panoramic view of surrounding area by resisting large scale, bulky development in and close to Horniman Gardens (Views to NW and SW ).
C4	LV4	Telegraph Hill	Maintain panoramic view of surrounding area by resisting large scale, bulky development in and close to top of Telegraph Hill (Views to NE and NW).
C8	LL3	Christchurch Forest Hill	Preserve views of this important local landmark by ensuring that new development does not obscure it.
C8	LL7	St. Bartholomew's Church Westwood Hill	Preserve views of this important local landmark by ensuring that new development does not obscure it.
D2	LV7	Foreshore, Deptford	Maintain panoramic view of River Thames from the setting of the Listed Buildings at Foreshore by resisting large scale, bulky developments close by (Views to SE, NE and NW).
D7	LV2	Blythe Hill Fields	Maintain panoramic view of surrounding area by resisting large scale, bulky developments close to the edges of the park (Views to all points).
E3	LL5	St Paul's Church Deptford	Maintain views of this important local landmark by ensuring that new development does not obscure it.
E5	LV3	Hilly Fields	Maintain panoramic view of surrounding area by resisting large scale, bulky developments close to the edges of the park (Views to NW and SW).
E6	LL4	St Mary's Church Ladywell	Maintain views of this important local landmark by ensuring that new development does not obscure it.

Map Ref	Site Ref	Site Address	Implementation Details
E6	LL8	Ladywell Water Tower	Maintain views of this important local landmark by ensuring that new development does not obscure it.
F5	LL2	Lewisham Clocktower	Maintain views of this important local landmark by ensuring that new development does not obscure it.
F7	LV5	Mountsfield Park	Maintain panoramic view of surrounding area by resisting large scale, bulky developments close to the edges of the park (Views to NW and SW).
F8	LV6	Forster Memorial Park	Maintain panoramic view of surrounding area by resisting large scale, bulky developments close to the edges of the park (Views to NE and NW).
G4	LL1	All Saints Church Blackheath	Maintain views of this important local landmark by ensuring that new development does not obscure it.

**Appendix 7****List of Evidence Documents**

<b>Housing</b>
Affordable Housing Viability Study (2009)
Lewisham Housing Conversions Study (2012)
Lewisham Housing Market Assessment 2007-2008 (2009)
Lewisham Housing Strategy
South East London Strategic Housing Market Assessment 2009
<b>Employment Land</b>
Lewisham Employment Land Study (2009)
<b>Built Environment and Public Realm</b>
Lewisham Tall Buildings Study (2010)
Lewisham Borough Wide Character Study (2010)
South East London Housing Partnership Wheelchair Homes Design Guidelines
Lewisham List of Locally Listed Buildings and Structures
London Borough of Lewisham Streetscape Guide
<b>Open Space and the Environment</b>
The Lewisham Open Space Strategy (2012)
Lewisham's Control of pollution and noise from demolition sites Code of practice (2008)
Lewisham Noise Mapping Study (2012)
Lewisham Air Quality Action Plan (2008)
Strategic Flood Risk Assessment (2008)
Flood Risk and Development Sequential Test (2009)
Lewisham Leisure and Open Space Study (May 2010)
Ravensbourne River Corridor Improvement Plan (2010)
Lewisham Renewables Evidence Base Study (2010)

<b>Housing</b>
<b>Retail</b>
Lewisham Retail Surveys 2011 and 2012 (Major and District Centres, Neighbourhood local centres, Local Parades)
Pubs in Lewisham: and evidence base study (2013)
Retail Capacity Study (2009)
Bell Green Retail Capacity Assessment (2006)
Supplementary Report to Lewisham Retail Capacity Study 2009 (September 2010)
Hot Food Take-away shops: and evidence base study (2013)
<b>Infrastructure, Transport and Community Facilities</b>
The Infrastructure Delivery Plan (2010)
The Lewisham Childcare Sufficiency Assessment (2008)
Deptford and New Cross Transport Infrastructure Study (2007)
Lewisham Town Centre Transport Study (2010)
Lewisham Town Centre Transport Study Report Addendum (2012)
Lewisham Borough Wide Transport Study (2010)

## Appendix 8

### London Plan Car Parking Standards

#### 8.1 Table of Car Parking Standards

Designated Blue Badge parking bays recommended in SBS 8300:2009			
Building Type	Provision from the outset		Future provision
	Number of spaces * for each employee who is disabled motorist	Number of spaces for visiting disabled motorists	Number of enlarged standard spaces**
Workplaces	One space	5% of the total capacity	A further 5% of the total capacity
Shopping, recreation and leisure facilities	One space	6% of the total capacity	A further 4% of the total capacity
Railway buildings	One space	5% of the total capacity	A further 5% of the total capacity
Religious buildings and crematoria	Two spaces or 6% whichever is greater		A further 4% capacity
Sports facilities***	Determined according to the usage of the sports facilities		

- \* Parking spaces designated for the use by disabled people should be 2.4m wide by 4.8m long with a zone 1.2m wide provided between designated spaces and at the rear outside the traffic zone, to enable a disabled driver or passenger to get in or out of a vehicle and access the boot safely.
- \*\* Enlarged standard spaces 3.6m wide by 6m long that can be adapted to be parking spaces designated for use by disabled people to reflect changes in local population needs and allow for flexibility of provision in the future.
- \*\*\* Further detailed guidance on parking provision for sports facilities can be found in the Sport England publication Accessible Sports Facilities 2010.

#### 8.2 Table of Retail Parking Standards

Maximum standards for retail uses: space per sq m of gross floorspace			
Use	PTAL 5 and 6	PTAL 5 to 2	PTAL 1
Food			
Up to 500m <sup>2</sup>	75	50-35	30
Up to 2500m <sup>2</sup>	45-30	30-20	18
Over 2500m <sup>2</sup>	38-25	25-18	15

Maximum standards for retail uses: space per sq m of gross floorspace			
Non food	60-40	50-30	30
Garden centre	65-45	45-30	25
Town centre/ shopping/ Department store	75-50	50-35	30

- **Notes:**
- Unless for disabled people, no non-operational parking should be provided for locations in PTAL6 central.
- Unless for disabled people, no additional parking should be provided for use Classes A2-A5 in town centre locations.
- 10% of all spaces must be for electric vehicles with an additional 10% passive provision for electric vehicles in the future.

### 8.3 Table of Parking Standards for Employment uses

Non-operational maximum standards for employment B1: spaces per sq m of gross floorspace	
Location	
Central London (CAZ)	1000-1500
Inner London	600-1000
Outer London	100-600
Outer London locations identified through DPD where generous standards should apply (see London Plan Policy 6.13)	50-100

- **Notes:**
- 20% of all spaces must be for electric vehicles with an additional 10% passive provision for electric vehicles in the future.

### 8.4 Table of Parking Standards for Residential development

Maximum parking standards			
Number of beds	4 or more	3	1-2
	2-1.5 per unit	1.5-1 per unit	Less than 1 per unit

- **Notes:**
- All developments in areas of good public transport accessibility should aim for significantly less than 1 space per unit.

- Adequate parking spaces for disabled people must be provided, preferably on-site.
- 20% of all spaces must be for electric vehicles with an additional 20% passive provision for electric vehicles in the future.





## Annex 1

### List of Open Spaces and Open Space Designations in Lewisham

This annex lists Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets, and shown on the Policies Map.

Table 1 includes open spaces that are categorised as Metropolitan Open Land, Urban Green Space, Public Open Space, Green Corridors and Green Chain Areas.

Table 2 lists London Squares protected by the London Squares Act. These sites are too small to be shown on the Policies Map

Table 3 separately lists the Sites of Importance for Nature Conservation (SINC) in Lewisham.

### Table 1 List of Open spaces in Lewisham

#### Open Space terminology used in Table 1

- **Metropolitan Open Land (MOL):** Metropolitan Open Land is considered to have characteristics that make it strategically important for the whole of London. MOL is a London Plan designation, as well as a designation in Local Plans.
- **MOL/UGS:** This is Metropolitan Open Land that is not accessible to the public
- **MOL/POS:** This is publicly accessible Metropolitan Open Land
- **Urban Green Space (UGS):** This is open space of local importance that is not accessible to members of the public, but is considered to perform various essential functions in the green infrastructure of London.
- **Public Open Space (POS):** This is open space of local importance that is accessible to the public.
- **SINC:** Site of Importance for Nature Conservation
- **Green Corridor:** This type of open space is usually not accessible to the public, as it is usually linear green space alongside railway lines
- **Green Chain:** Open spaces associated with the Green Chain Walk

Note: The ID Reference in Tables 1 and 2 is taken from Map 2 of the Lewisham Leisure and Open Space Study 2009 in the Lewisham Evidence Base. It is included for ease of cross referencing. Most open spaces were included in the study, but in a few cases there is no cross reference to the study available.

ID Ref	Site	Open Space Type	Open Space Designation
1	Abbotshall Road	Sports Ground	UGS
2	Adamsrill Road, disused allotments	Allotments	UGS
5	Adolf St/Overdown Road	Allotments	UGS
6	Albion Villas Millennium Green	Miscellaneous - Amenity Greenspace	POS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map**

ID Ref	Site	Open Space Type	Open Space Designation
8	Bellingham Leisure and Lifestyle Centre, Randlesdown Road	Sports Ground	UGS
9	Ballamore/Shroffold Road	Allotments	UGS
10	Baring Road and Bramdean Road r/o	Allotments	MOL/UGS
11	Barmeston Road	Allotments	UGS
12	Barriedale	Allotments	UGS
13	Baxter Field, Radlet Avenue	Park	POS
14	Beachborough Gardens, Beachborough Road	Miscellaneous - Amenity Greenspace	POS
15	Beaulieu Avenue Green	Miscellaneous - Amenity Greenspace	UGS
16	Beckenham Hill Park	Miscellaneous - Amenity Greenspace	POS
17/	Beckenham Place Park	Park	MOL/POS/Green Chain
19	Bellingham Bowling Club, Greenside Close, Penderry Rise	Sports Ground	UGS
20	Bellingham Green	Park	POS
21	Bellingham Play Park, Winsford Road	Park	MOL/POS
25	Besson Street Nature Reserve	Miscellaneous - SINC	POS
26/407 408/304	Blackheath	Park	MOL/POS
28	Blackheath Hockey Club, Rubens Street	Sports Ground	MOL/UGS
29	Blackhorse Road	Allotments	UGS
30	Blythe Hill	Allotments	UGS
31	Blythe Hill Fields	Park	POS
32	Bridge Leisure Centre East, Kangley Bridge Road	Sports Ground	UGS
33	Bridge Leisure Centre West, Kangley Bridge Road	Sports Ground	UGS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

<b>Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map</b>			
<b>ID Ref</b>	<b>Site</b>	<b>Open Space Type</b>	<b>Open Space Designation</b>
34	Bridgehouse Meadows, Surrey Canal Road	Park	POS
35	Broadmead	Allotments	UGS
36	Broadway Fields West, Brookmill Road	Park	MOL/POS
36	Broadway Fields East, Deals Gateway	Park	POS
37	Brockley & Ladywell Cemetery	Miscellaneous – Cemeteries and churchyards, SINC	POS
38	Brockley Hill Private Gardens	Miscellaneous – Private Gardens	UGS
39	Bromley Hill Cemetery	Miscellaneous – Cemeteries and churchyards, SINC	POS
40	Brookmill Nature Reserve, Brookmill Road	Miscellaneous - SINC	UGS
406	Brookmill Park, River Ravensbourne and Nature Area	Park, SINC	MOL/UGS/POS
42	Burnt Ash Pond Nature Reserve, Melrose Close	Miscellaneous – SINC	UGS
43	Castillon Road	Allotments	UGS
44	Catford Wanderers Sports Club, Beckenham Hill Road	Sports Ground	UGS
45	Chinbrook Community Orchard	Miscellaneous - SINC	MOL/UGS/Green Chain
46	Chinbrook Meadows	Allotments	MOL/UGS/Green Chain
46/300	Chinbrook Meadows	Park, Green Corridor	MOL/POS/Green Corridor/Green Chain
48	Clarendon Rise/Dermody Road	Allotments	UGS
	Conington Road	Miscellaneous – Amenity Greenspace	POS
182	Cornmill Gardens	Park	MOL/POS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map**

ID Ref	Site	Open Space Type	Open Space Designation
50	Crossfield Street Open Space	Miscellaneous – Amenity Greenspace, SINC	POS
51	Culverley Green	Miscellaneous – Amenity Greenspace	POS
52	Dacre Park	Allotments	UGS
53	Dacres Wood Nature Reserve, Dacres Road	Miscellaneous – SINC	POS
54	Dartmouth Road Open Space	Miscellaneous – Amenity Greenspace	POS
55	De Frene Road Allotments r/o 37	Allotments	UGS
56	Deloraine Street	Allotments	UGS
58	Deptford Park	Park	POS
60	Devonshire Road Nature Reserve	Miscellaneous – SINC	UGS
61	Downham Playing Fields	Miscellaneous – Playing Fields	POS
308	Downham Way, The Green	Miscellaneous – Amenity Greenspace	POS
64	Durham Hill (Downham Fields)	Park	POS
65	Eckington Gardens, Casella Road	Park	POS
66	Edith Nesbitt Gardens, Leyland Road, Osberton Road	Park	POS
68	Edward Street	Allotments	UGS
	Edward Street play area (New Deptford Green)	Miscellaneous – Playing courts	UGS
70	Elfrida Crescent East	Miscellaneous – Amenity Greenspace	UGS
71	Elm Lane Sports Ground	Sports Ground	MOL/UGS
72	Evelyn Green	Park	POS
73	Exford Road Allotments	Allotments	MOL/UGS
74	Exford Road Allotments Entrance	Miscellaneous – Amenity Greenspace	MOL/UGS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map**

ID Ref	Site	Open Space Type	Open Space Designation
76	Exford Road/Burnt Ash Hill Triangle	Miscellaneous – Amenity Greenspace	UGS
77	Farmstead Road/Overdown Road	Miscellaneous – Amenity Greenspace	UGS
400	Ferranti Park	Park	POS
70	Firhill Road Playing field	Sports Ground	MOL/UGS
79	Firhill Road North Allotments	Allotments	UGS
80	Firhill Road South Allotments	Allotments	UGS
81	Folkestone Gardens, Trundleys Road	Park	POS
83	Fordham Park, Pagnell Street	Park	POS
84	Forest Hill Bowls Club, Wynell Road	Sports Ground	UGS
85	Forster Memorial Park	Park, SINC	POS
86	Friendly Gardens	Park	POS
87	Garthorne Road Nature Reserve	Miscellaneous – SINC	UGS
309	Grangemill Way Allotments	Allotments	UGS
88	Ghent Street	Miscellaneous – Amenity Green Space	UGS
89	Gilmore Road Triangle	Park	POS
90	Goan Club, Ravensbourne Avenue	Sports Ground	MOL/UGS
91	Goldsmiths' College Green	Miscellaneous – Amenity Green Space	UGS
92	Grove Park Cemetery	Miscellaneous – Cemeteries and churchyards	MOL/Green Chain
93	Grove Park Library and Gardens	Park	MOL/POS
94	Guys Hospital Sports Ground, Brockley Rise	Sports Ground	UGS
96	Hatcham Gardens	Park	POS
97	Hazelbank Road Allotments	Allotments	UGS
98	Hilly Fields	Park, SINC	POS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map**

ID Ref	Site	Open Space Type	Open Space Designation
102	Hither Green Sidings	Miscellaneous –open green space, SINC	MOL
99	Hither Green Cemetery	Miscellaneous – Cemeteries and churchyards, SINC	MOL
100	Hither Green Nature Reserve	Miscellaneous - SINC	MOL/UGS
104	Home Park	Park	POS
105	Honor Oak Adventure Playground and Nature Reserve	Miscellaneous - SINC	UGS
106	Honor Oak Covered Reservoir	Miscellaneous – SINC	UGS
107	Horniman Gardens	Park, SINC	MOL/POS/Green Chain
108	Horniman Play Park	Park, SINC	POS/Green Corridor
156	Horniman Drive/Rocombe Crescent Triangle	Miscellaneous – Amenity Greenspace	UGS
100	Hurstbourne Road Allotments	Allotments	UGS
110	Jim Hurren Allotments, Overdown Road (south)	Allotments	UGS
111	Kendale Road Allotments	Allotments	UGS
112	Kirkdale Green	Park	POS
114	Knapmill Way Allotments	Allotments	UGS
117/415	Ladywell Fields * including Nature Reserve	Park, SINC	MOL/POS/UGS/Green Corridor
116	Ladywell Lodge/Green	Park	POS
119	Launcelot Road, disused allotments	Allotments	UGS
120	Lee & District Land Club r/o Baring Road	Allotments	MOL/UGS
121	Leslie Silk Allotments, Overdown Road (north)	Allotments	UGS
122	Lewisham Park	Park	POS
124	Long Meadow Allotments	Allotments	MOL/UGS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

<b>Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map</b>			
<b>ID Ref</b>	<b>Site</b>	<b>Open Space Type</b>	<b>Open Space Designation</b>
125	Longshore, Sites at	Amenity Greenspace	POS
126	Longton Nursery, Churchley Road	Allotments	UGS
127	Luxmore Gardens	Park	POS
128	Manor House Gardens	Park, SINC	POS
129	Manor Park	Park, SINC	POS
130	Margaret McMillan Park	Park	POS
132	Mayow Park	Park, SINC	POS
133	Meadow Close Allotments	Allotments	UGS
134	Midland Bank Sports Ground, Calmont Road	Sports Ground	MOL/UGS
135	Milborough Crescent	Miscellaneous - Amenity Greenspace	UGS
137	Mountsfield Park	Park, SINC	POS
138	New Cross Gate Cutting Nature Reserve	Miscellaneous - SINC	UGS
139	Northbrook Park	Park	MOL/POS/Green corridor
141	Oldstead Road	Allotments	UGS
142	Oslac Road	Miscellaneous - Amenity green/playspace	POS
144	Pepys Park including Nature Area	Park including a SINC	POS
350	Pitfold Close Amenity Space	Miscellaneous – Amenity greenspace	UGS
146	Prendergast Girls' School fields	Sports Ground	UGS
147	Priestfield Road	Allotments	UGS
148	Private Banks' Sports Ground	Sports Grounds	MOL/UGS
149	Quaggy Gardens	Miscellaneous - Amenity Space	POS
313	Queen's Road	Miscellaneous – Amenity Greenspace	UGS
150	Queenswood Road Nature Reserve	Miscellaneous - SINC	UGS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map**

ID Ref	Site	Open Space Type	Open Space Designation
151	Ravensbourne Park Gardens	Park	POS
152	Reigate Road Open Space	Miscellaneous - Amenity Green Space	MOL/POS
153/55	Riverview Pool Linear Walk/Riverview Walk/Waterlink Way	Park	MOL/POS
157	Romborough Gardens	Allotments	UGS
158	Royal Naval Place Stage 1	Allotments	UGS
159	Royal Naval Place Stage 2	Allotments	UGS
161	Rutland Walk Sports Club, Rutland Walk	Sports Ground	MOL/UGS
163	Sayes Court Park	Park, SINC	POS
82/165	Sedgehill School	Miscellaneous - Amenity Open Space, Playing Fields	MOL/UGS/Green chain
164	Sedgehill Road	Allotments and SINC	MOL/UGS/Green Chain
166	Shaw Road	Miscellaneous – Amenity Green Space and SINC	POS
168	Slaithwaite Road Allotments	Allotments	UGS
169	Southend Park	Park	POS
171	St Dunstan’s College, Stanstead Road	Sports Grounds	UGS
172	St Joseph’s Academy Playing Fields	Sports Grounds	UGS
174	St Mary’s Churchyard, Lewisham High Street	Miscellaneous – Cemeteries and churchyards, SINC	MOL
175	St Mildred’s Road, Allotments	Allotments	MOL/UGS
176	St Norbert Green	Park	POS
177	St Norbert Road	Allotments	UGS
178	St Paul’s Churchyard and Children’s Playground	Park	POS
179	Stanley Street Allotments	Allotments	UGS



## Annex 1 Open Spaces and Open Space Designations in Lewisham

<b>Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map</b>			
<b>ID Ref</b>	<b>Site</b>	<b>Open Space Type</b>	<b>Open Space Designation</b>
180	Ringway Centre/Stratfield House Baring Road	Miscellaneous – Amenity Space	MOL
181	Sue Godfrey Nature Park	Miscellaneous – Green Open Space, SINC	POS
18	Sydenham Cottages Nature Reserve	Miscellaneous - SINC	MOL/POS
184	Sydenham Park Allotments	Allotments	UGS
185	Sydenham Park Road, r/o 141-143	Miscellaneous – Amenity Greenspace	UGS
186	Sydenham Wells Park	Park, SINC	POS/Green Chain
187	Tarleton Gardens inc. Eliot Bank Hedge	Miscellaneous – Amenity Green Space, SINC	UGS
188	Taylor's Lane Allotments	Allotments	UGS
189	Telegraph Hill Park	Park, SINC	MOL/POS/Green Chain
190	Ten-Em-Bee Sports Club, Old Bromley Road	Sports Grounds	MOL/UGS
192	Thurbarn Road	Miscellaneous – Amenity green/playspace	POS
193	Trewsbury Road	Allotments	UGS
194	Turnham Road Green	Miscellaneous – Amenity green space	UGS
196	Weavers Estate Allotments, Engleheart Road	Allotments	UGS
198	Whitefoot Recreation Ground	Sports Ground and SINC	UGS/Green Corridor
201	Windlass Place	Allotments	UGS
202/422/ 423/424/ 425	Woodland Walk Downham	Park, SINC	POS

## Annex 1 Open Spaces and Open Space Designations in Lewisham

<b>Table 1 Annex 1: List of Open Spaces designated by Core Strategy Policy 12 Open space and environmental assets and shown on the Policies Map</b>			
<b>ID Ref</b>	<b>Site</b>	<b>Open Space Type</b>	<b>Open Space Designation</b>
203	Woodyates Road and Pitfold Road r/o	Miscellaneous – Amenity Green Space	UGS
211	Railway area between Friendly Street and St John's Vale	Green Corridor	Green Corridor
	Railway areas between Elverson Road and Bertrand Street, Elverson Road and Granville Park and between Thurston Road River Ravensbourne	Green Corridor	Green Corridor
217	Hither Green Station Railway Lands	Green Corridor	Green Corridor
	Railway line areas between Oldfield Grove and south east corner of Bridgehouse Meadows	Green Corridor	Green Corridor
402	Railway line area between south western corner of Bridgehouse Meadows and White Post Street	Green Corridor	Green Corridor
409/410	Railway line area between Engate Street and Ennersdale Road	Green Corridor	Green Corridor
412	Railway line area including Lee Station between Lee High Road and borough boundary	Green Corridor	Green Corridor
414	Railway line area between Crofton Park and Ladywell Fields	Green Corridor	Green Corridor
418	Railway line area between Forest Hill and Sydenham not protected by SINC designations	Green Corridor	Green Corridor
419/20	Railway Area/Amblecote Meadows/Pullman Close	Green Corridor	Green Corridor
	Railway area between south end of Cumberland Place and Baring Road	Green Corridor	Green Corridor
430	Railway line areas between New Cross/New Cross Gate and Surrey Canal Road	Green Corridor	Green Corridor

**Table 2: London Squares**

- Table 2 lists London Squares within the London Borough of Lewisham protected by the London Squares Preservation Act 1931. London Squares are small open spaces protected by the Act as follows: Clause 3 (1) Subject to the provisions of this Act a protected square shall not be used

## Annex 1 Open Spaces and Open Space Designations in Lewisham

otherwise than for one of the following purposes (that is to say) the purpose of an ornamental garden, pleasure ground or ground for play rest or recreation (in this Act referred to as ‘authorised purposes’) and no building or other structure or erection shall be erected or placed on or over any protected square except such as may be necessary or convenient for or in connection with the use and maintenance of such square for one or more of the authorised purposes.

- Most of these squares, due to their small size, have not been designated as open space on the Policies Map.

<b>ID Ref</b>	<b>Site</b>	<b>Open Space Type</b>	<b>Open Space Designation (if any)</b>
3	Addington Grove	London Square – Amenity Green Space	
4	Adelaide Avenue	London Square – Amenity Green Space	
51	Culverley Green, Culverley Road	London Square – Amenity Green Space	POS
57/123	Deptford Memorial Gardens, Lewisham Way/Wickham Road	London Square – Amenity Green Space and War Memorial Gardens	
59	Dermody Road	London Square – Amenity Green Space	
63	Duncombe Hill	London Square – Amenity Green Space	
	Fambridge Close	London Square – Amenity Green Space	
160	London Squares at Catford (Rushey Green east side between Davenport and Rosenthal Road and squares to the north and south of junction with Brownhill Road)	London Squares – Amenity Green Space	
200	Wickham Gardens	London Square – Amenity Green Space	
302	Lewisham Memorial Gardens, Lewisham High Street	London Squares – Amenity Green Space and War Memorial Gardens	
	Lewisham High Street London Squares (west side between Bradgate Road and Ladywell Road)	London Squares – Amenity Green Space	

**Table 3: List of Sites Designated as Sites of Importance for Nature Conservation**

## Annex 1 Open Spaces and Open Space Designations in Lewisham

- This table provides a separate list of Sites of Importance for Nature Conservation (SINC).
- These sites are designated as part of Core Strategy Policy 12 Open space and environmental assets. Most of the sites have other open space designations and are also referred to in Table 1.
- It is a consolidated List including all amendments from the Site Allocations Development Plan Document 2012, with cross references to the evidence base.
- The sites were last formally surveyed by the GLA in 2005/6. Records of these surveys and any up-dated information is to be found at [www.gigl.org.uk](http://www.gigl.org.uk).

<b>Table 3 Annex 1: List of Sites designated on the Policies Map as Sites of Importance for Nature Conservation (SINC)</b>			
<b>GLA Survey Reference</b>	<b>Lewisham Open Space Study 2009 ID from Map 21</b>	<b>Site Allocations Local Plan Reference</b>	<b>Site Title</b>
<b>Sites of Metropolitan Importance</b>			
M31	64		The River Thames and tidal tributaries (Deptford Creek)
M69	4		Blackheath
M122	21		Forest Hill to New Cross Gate Railway Cutting
M135	2		Beckenham Place Park
<b>Sites of Borough Importance: Grade I</b>			
LeBI01	6		Brockley and Ladywell Cemeteries
LeBI02	28	SINC 1	Hither Green Cemetery, Lewisham Crematorium and Reigate Road Open Space
LeBI03	17		Downham Woodland Walk
LeBI04	46	SINC 2	Pool River Linear Park
LeBI05	26	SINC 3	Hillcrest Estate Woodland
LeBI06	25	SINC 4	Grove Park Nature Reserve
LeBI07	22	SINC 5	Forster Memorial Park
<b>Sites of Borough Importance: Grade II</b>			
LeBII01	11		Burnt Ash Pond Nature Reserve
LeBII02	32		Horniman Gardens, Horniman Railway Trail and Horniman Play Park

## Annex 1 Open Spaces and Open Space Designations in Lewisham

<b>Table 3 Annex 1: List of Sites designated on the Policies Map as Sites of Importance for Nature Conservation (SINC)</b>			
<b>GLA Survey Reference</b>	<b>Lewisham Open Space Study 2009 ID from Map 21</b>	<b>Site Allocations Local Plan Reference</b>	<b>Site Title</b>
LeBII04	18		Durham Hill
LeBII05	16		Dacres Wood Nature Reserve and Sydenham Park railway cutting
LeBII06	37	SINC 6	Loats Pit
LeBII07	24	SINC 7	Grove Park Cemetery
LeBII08	59		Sue Godfrey Nature Park
LeBII09	31		Honor Oak Road Covered Reservoir
LeBII10	58		St Mary's Churchyard, Lewisham
LeBII11	39		Manor House Gardens
LeBII12	40		Mayow Park
LeBII13	56		Spring Brook at Downham Playing Fields
LeBII14	51		River Ravensbourne and Brookmill Park
LeBII15A	54		Senegal Railway Banks
LeBII15B	43		New Cross to St Johns railsides
LeBII51C	44	SINC 8	Nunhead Cutting
LeBII15D	8		Brockley to St John's railsides
LeBII15E	57	SINC 9	St John's to Lewisham railsides
LeBII15F	35	SINC 10	Lewisham Railway Triangles
LeBII15G	36		Lewisham to Blackheath railsides
LeBII15H	29	SINC 11	Hither Green railsides
LeBII15I	30	SINC 12	Hither Green Sidings
LeBII15M	48		Railsides south of Sydenham
LeBII5N	38		Lower Sydenham station allotments
LeBII15O	42	SINC 13	New Cross and New Cross Gate railsides

## Annex 1 Open Spaces and Open Space Designations in Lewisham

**Table 3 Annex 1: List of Sites designated on the Policies Map as Sites of Importance for Nature Conservation (SINC)**

<b>GLA Survey Reference</b>	<b>Lewisham Open Space Study 2009 ID from Map 21</b>	<b>Site Allocations Local Plan Reference</b>	<b>Site Title</b>
LeBII18	41	SINC 14	Mountsfield Park
LeBII19	12	SINC 15	Chinbrook Community Orchard and Allotments
LeBII20	13	SINC 16	Chinbrook Meadows
<b>Sites of Local Importance</b>			
LeL01	10		Brookmill Nature Reserve
LeL02	3		Besson Street Community Garden
LeL03	34		Ladywell Fields
LeL04	60		Sydenham Cottages Nature Reserve
LeL05	20		Folkestone Gardens
LeL06	64		Whitefoot Recreation Ground
LeL07	47		Queenswood Nature Reserve
LeL08	49		Rainsborough Avenue Embankments
LeL09	52		Sayes Court Park
LeL10	33		Iona Close Orchard
LeL11	53		Sedgehill Allotments
LeL12	7		Brockley Hill Park
LeL14	61		Sydenham Wells Park
LeL15	27		Hilly Fields
LeL16	19		Eliot Bank Hedge and Tarleton Gardens
LeL17	427		Southend Pond 'Peter Pan's Pool'
LeL18	50		River Quaggy and Manor Park
LeL19	1		Albion Millennium Green
LeL20	14		Creekside Education Centre
LeL21	45		Pepys Park Nature Area

**Table 3 Annex 1: List of Sites designated on the Policies Map as Sites of Importance for Nature Conservation (SINC)**

<b>GLA Survey Reference</b>	<b>Lewisham Open Space Study 2009 ID from Map 21</b>	<b>Site Allocations Local Plan Reference</b>	<b>Site Title</b>
LeL22	15		St Paul's Churchyard and Crossfield Street Open Space
LeL23	62		Telegraph Hill Park
LeL24	9	SINC 17	Bromley Hill Cemetery
LeL26	23	SINC 18	Gilmore Road Triangle



Lewisham