



**London Borough of Lewisham
Local Development Framework
Development Management Local Plan
Sustainability Appraisal Adoption Statement**

1. Overview

- 1.1 Lewisham Council adopted the Development Management Local Plan (DMLP) development plan document at its meeting on 26 November 2014. In accordance with Regulation 16(3) and (4) of the SEA Regulations, the Council has produced this sustainability appraisal (SA) adoption statement. It describes:
- how the SA process has influenced the progression of the DMLP
 - how environmental considerations and consultation responses have been taken into account during its preparation
 - outlines the reasons for choosing the preferred strategy in light of other reasonable alternatives
 - sets out measures that will be used to monitor the effects of the DMLP.
- 1.2 Full details are set out in the final SA, which was submitted with the DMLP to the Secretary of State for Communities and Local Government on 15 November 2013.

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

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

3. SA process

3.1 The Development Management Local Plan identifies, designates and safeguards land for a particular use, and sets out policies to be used when determining planning applications.

3.2 The progressive stages of the SA have been prepared by officers from the London Borough of Lewisham's Planning Policy team, Mouchel, and Pro Vision Planning and Design, with input from other relevant services of the Council.

3.3 The SA comprised a number of stages.

- The production of a **scoping report**, which examined sustainability issues in the borough. The issues identified were used to produce a sustainability appraisal framework against which the plan could be measured. The scoping report was published for consultation in May 2005.
- The appraisal of the **issues and options** and **preferred options**, the results of which are presented within the SA report, April 2007.
- The **revised SA scoping report**, December 2011.
- The appraisal of the **further options**, the results of which are presented within the SA report, December 2012.
- The appraisal of the **proposed submission** plan, the results of which are presented within the SA report, May 2013.
- The appraisal of the **submission version** of the plan, November 2013.
- The appraisal of the **main modifications** to the plan proposed in April 2014 during the Examination in Public.

3.4 At each stage the vision, objectives and policy content of the DMLP were assessed against a framework of sustainability objectives. The objectives covered social, environmental and economic issues reflecting national, regional and local issues as well as environmental considerations set out in the SEA guidance. Table 1 summarises the key sustainability issues.

Table 1: Key sustainability issues

Key Sustainability issues
Economic
Local employment / training opportunities
High commuter population working outside of the Borough of Lewisham
Fostering the borough's creative industries
<ul style="list-style-type: none">• There is a need to create and sustain employment and training opportunities in the borough to enhance the local economy. Opportunities need to be taken to support and retain local employment growth sectors.• The Borough has recognised clusters of creative industries. There is a need to ensure employment areas and mixed use development provides suitable accommodation for this use.
Provide and protect local shopping areas
<ol style="list-style-type: none">2. Population growth will result in a need to enhance the vitality of local shopping areas, including markets, to reduce the need to travel outside the Borough for goods and services.

Key Sustainability issues
<p>Finding a balance between meeting housing targets and maintaining economic and cultural vitality</p> <ul style="list-style-type: none"> • A general conflict between meeting housing targets and protecting sites for other uses such as employment, retail, education, health, community in a built up environment.
<p>Environmental</p>
<p>Protecting and improving biodiversity and natural habitats including local waterways</p> <ul style="list-style-type: none"> • Species such as the stag beetle, house sparrow and black redstart are local to this area but numbers have suffered decline. • The naturalisation of Lewisham's rivers offers the potential to reduce flood risk, boost local biodiversity and improve river water quality through biological filtration. • The continued protection and enhancement of the Borough's 70 sites designated as Sites of Importance to Nature Conservation and 19 Local Nature Reserves.
<p>CO₂ emissions contributing to climate change</p> <ul style="list-style-type: none"> • Climate change due to greenhouse gas emissions is likely to affect the natural environment. The Borough will need to adapt to these changes and find ways of reducing carbon emissions. The domestic sector is the largest contributor to CO₂ emissions in Lewisham. The largest contributor to domestic emissions is space heating and cooling, which produce three times as many as either water heating or appliances and ten times as many as lighting. <p>Climate change impacts</p> <ul style="list-style-type: none"> • Climate change will have an impact on biodiversity, health, flooding, the historic environment, the urban environment such as heat island effect, increased surface water flooding and extreme weather conditions. <p>Climate change mitigation</p> <ul style="list-style-type: none"> • CO₂ emissions can be reduced as part of a new development through improved energy efficiency, provision and promotion of renewable energy, improved water efficiency and less reliance on the private car. <p>Climate change adaptation</p> <ul style="list-style-type: none"> • A range of adaptation measures will need to be adopted including SUDS, flood defence, green infrastructure, green walls/roofs and more sustainable transport etc.
<p>Traffic congestion and car dependence</p> <ul style="list-style-type: none"> • A growing population will place pressure on the road network and existing public transport. There is a need to locate development near existing transport links; improve walking and cycling routes and public transport; and adopt a managed and restrained approach to car parking. <p>High levels of air and noise pollution</p> <ul style="list-style-type: none"> • The Borough of Lewisham is exceeding pollution levels for road transport as set out in the Lewisham Air Quality Action Plan. With predicted population growth there is a current and future need to increase the use of sustainable modes of transport and reduce carbon emissions.
<p>Managing soil contamination and reducing the risk of land contamination</p> <ul style="list-style-type: none"> • An understanding of the solid and superficial geology is essential in order to

Key Sustainability issues
<p>determine whether potentially contaminated sites are likely to have an impact on controlled waters or adjacent sites. Land contamination from historical sources poses a particularly high risk to groundwater used for human consumption in the area of the Lower Ravensbourne valley between Lewisham and Deptford. Criteria will be a necessary in the consideration of risk assessment processes applied to a site evaluation when development is proposed.</p> <p>Protect and provide opportunities to enhance local heritage assets (cultural, archaeological and historic) from redevelopment and recognise the beneficial contribution that the historic environment can make to an area</p> <ul style="list-style-type: none"> • Lewisham has 27 Conservation Areas and 357 designated heritage asset entries of which: <ul style="list-style-type: none"> ○ 323 are Grade II Listed Buildings (many of which represented groups of buildings) ○ 28 are Grade II* Listed Buildings (many of which represented groups of buildings) ○ 2 are Grade I Listed Buildings (Boone's Chapel in Lee High Road and St Paul's Church in Deptford) ○ 3 are Historic Parks and Gardens ○ 1 is a Scheduled Ancient Monument • The Borough has its own architectural identity and character which should be preserved or enhanced, and incorporated into development where appropriate. Social and economic benefits can arise from a well maintained and respected historic environment. <p>Certain areas within Deptford New Cross and along the Borough's river network are within Flood Zone 3a (high probability)</p> <ul style="list-style-type: none"> • Climate change is predicted to increase adverse weather patterns leading to more intense and severe flooding. There is a need to reduce and manage flood risk (including sewer flooding). Approximately 21,000 properties are at risk of flooding from tidal and river sources (16%) of all properties. Water and sewerage infrastructure may be necessary in flood risk areas. <p>Low levels of recycling and the need to reduce total waste production</p> <ul style="list-style-type: none"> • There is a need to reduce waste generation and improve recycling and composting rates and manage waste within the Borough boundary.
Social
<p>High demand for housing, however affordability remains an issue as the population continues to grow</p> <ul style="list-style-type: none"> • There has been a decline in the proportion of detached and semi-detached houses and an increase in the number of single houses converted into flats. The London Plan requires at least 11,050 new residential dwellings to be built in the Borough by 2021. The average household income is insufficient to buy a house.
<p>Improved access to health care, education, community and cultural facilities</p> <ul style="list-style-type: none"> • Ensure health, education, community and cultural facilities are provided to accommodate the needs arising from new developments and meet existing needs. Loss of such facilities needs to be assessed to determine appropriate replacement or re-provision.

Key Sustainability issues
<p>General perception of high crime</p> <ul style="list-style-type: none"> • Though the Borough has relatively low levels of crime compared to other inner London boroughs, the perception of crime is high. There is a need to provide a safe and well designed urban environment. <p>Addressing deprivation, social exclusion and health inequalities</p> <ul style="list-style-type: none"> • London Borough of Lewisham is the 31st most deprived local authority in England. Bellingham, Evelyn, Lewisham Central, Rushey Green and Whitefoot wards have the highest concentration of deprivation and are placed in the 10 per cent most deprived. • There is a strong link between deprivation levels and health inequality, with residents in deprived areas suffering disproportionately high levels of health problems.
<p>Provision of, and access to, open space, community, cultural and recreational facilities</p> <ul style="list-style-type: none"> • Future growth in housing will result in a lower proportion of open space per 1,000 people. Opportunities to provide additional open spaces from potential developments and improve access to existing spaces, must be used to improve health and well-being. • The provision of a range of community, cultural and recreational facilities needs to be monitored to ensure adequate provision and access.

4. How sustainability and environmental considerations have been integrated into the Development Management Local Plan, and how the environmental report has been taken into account

4.1 The SA identified the key sustainability issues in Table 1 above. The DMLP has been progressed to address these sustainability issues. The DMLP integrates sustainability and environmental issues in the following key ways.

- Increasing the number and variety of job opportunities for local people by protecting land for employment use within neighbourhoods.
- Supporting the growth of key economic sectors by maintaining a varied supply of business premises by ensuring a mix in employment land designations.
- Enabling Lewisham to adapt to the effects of climate change through the design of the built environment.
- Reducing carbon emissions by minimising the need to travel, promoting decentralised energy networks, and maximising energy efficiency in buildings.
- Safeguarding and increasing biodiversity, and seeking living roofs where appropriate.
- Increasing the quality of open space by safeguarding, linking and upgrading existing open space, improving access to open space, planting new trees, and seeking new on-site open space where appropriate.
- Creating and sustaining distinctive local places through excellent design of buildings and the public realm, valuing heritage assets and the natural environment.

- Developing and sustaining stable neighbourhoods with a high quality, liveable residential environment, respecting local amenity, and ensuring good access to local services and transport.
- Protecting and enhancing historic assets.
- Preventing the loss of existing housing and protecting single family houses (with three or more bedrooms) in order to meet identified housing need and provide housing choice.
- Supporting the provision of affordable rented housing to support affordable housing for many of the borough's residents in need of social housing.
- Contributing to improving health and well-being and reducing health inequalities in the by working with NHS Lewisham, encouraging healthy lifestyles in the design of the built environment.
- Providing essential physical, social and green infrastructure to support population and economic growth through the co-ordinated delivery of infrastructure programmes through the Infrastructure Delivery Plan and ongoing liaison with statutory undertakers.

5. How the consultation findings have been taken into account

- 5.1 The following sections explain how the SA consultation responses have been taken into account.
- 5.2 Preparation of the SA for the DMLP was an iterative process informing policy formulation at every stage. There have been six stages of consultation in total. Consultation has been undertaken in accordance with Article 6 of the SEA Directive, the SEA Regulations, the Town and Country Planning (Local Development) (England) Regulations 2012 and Lewisham's adopted Statement of Community Involvement (July 2006).
- 5.3 Throughout the process, three key bodies are required to be consulted – the Environment Agency, English Heritage and Natural England (formerly English Nature and the Countryside Agency). All consultees on the Council's consultation database have also been given the opportunity to comment. Comments have shaped the appraisal and have been fed into the assessment of options, preferred options, further options and the formulation of the DMLP itself up to and including the examination stage. Details regarding the comments received and the changes made to the sustainability appraisals as a result of those comments have been provided in each of the sustainability appraisal documents.
- 5.4 Work on the DMLP began in 2005. Table 2 summarises the key stages in the development of the plan and SA, the timetable and the opportunities for comment during the process. At each stage the DMLP was revisited to ensure that representations received could be addressed, as appropriate.

Table 2 Key stages in the development of the Development Management Local Plan

Sustainability Appraisal Reports	DMLP	Consultation Period
Sustainability Appraisal Scoping Report 2005	Development Policies Issues and Options Report 2005 (Combined with the Spatial (core) Strategy)	Scoping Report May 2005 – June 2005 (the issues and options documents were consulted on separately between May and November 2005)
Sustainability Appraisal Preferred Options Report 2007	Development Policies and Site Allocations Preferred Options Report 2007	June 2007 – August 2007 (alongside the Development Policies Preferred Options)
Sustainability Appraisal Revised Scoping Report 2011	N/A	December 2011 – January 2012
Sustainability Appraisal Further Options Report November 2012	Development Management Local Plan Further Options Report December 2012	December 2012 – January 2013 (alongside the DMLP Further Options)
Sustainability Appraisal Proposed Submission Report May 2013	Development Management Local Plan Proposed Submission August 2013	August 2013 – October 2013 (alongside the DMLP Proposed Submission)
Sustainability Appraisal Submission Report November 2013	Development Management Local Plan Submission November 2013	Consultation not required at submission stage.
Sustainability Appraisal of main modifications April 2014 during Examination in Public	Main modifications to plan, proposed June 2014 during Examination in Public	April 2014 – June 2014

5.6 The DMLP Consultation Statement November 2013 describes how the Council has undertaken community participation and involvement in the preparation of the plan and identified where changes were made during redrafting to the DMLP as a result of representations received for the following stages:

- scoping / pre-production (2005)
- issues and options (2005)
- preferred options (2007)
- further options (2013)
- proposed submission (2013).

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

6. The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with

6.1 The SA process was integral to the Development Management Local Plan preparation, commencing with the production of the SA scoping report. This involved identifying the sustainability issues and objectives, as well as identifying relevant baseline information and indicators.

- 6.2 The DMLP went through distinct iterations. At each stage the DMLP was tested against the SA framework so that the economic, environmental and social implications of different policy options could be taken into consideration. The DMLP was developed and modified, as appropriate, in line with the findings of the SA and in line with the comments received from consultees regarding the iterations of the SA, the scoping report, the issues and options, and the draft versions on the plan.
- 6.3 The preferred options report and further options report sets out the reasons why the policy options were selected, in light of other reasonable alternatives dealt with. Further justification is provided in the text within the adopted version of the plan, and within the Council's responses to representations received at submission and examination stage. These documents can be viewed on the Council's website at:
<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Pages/default.aspx>
- 7. Measures that are to be taken to monitor the significant environmental effects of the implementation of the plan**
- 7.1 The Council will monitor the significant environmental effects of the implementation of the plan through the monitoring framework set out in section 7 and appendix 3 of the adopted plan. The monitoring results will be reported in the Council's annual monitoring report, and in other specialist reports where required.

Further information

A full copy of the SA for the Development Management Local Plan can be downloaded from the Council's website:

<http://www.lewisham.gov.uk/myservices/planning/policy/LDF/development-policies/Pages/default.aspx>