

London Borough of Lewisham



**Response to the Examining Authority's
first written questions**

Thames Tideway Tunnel

**Submission Reference: LBLew03
Unique Reference Number: 10018610
National Infrastructure Directorate Project Ref: WW010001**

November 2013

This document sets out the London Borough of Lewisham's response to the Examining authority's (ExA) first written questions and requests for information in relation to the application by Thames Water Utilities Limited for the Thames Tideway Tunnel. Question reference numbers are those provided by the ExA. Responses are only given to questions relevant to LB Lewisham or where the ExA specifically requests information or a response.

Question	LB Lewisham response
Q2 Biodiversity, Biological Environment & Ecology	
Q2.1	<p>The applicant has made an assessment but has not carried this out at a optimal time of year and not to the level of detail that the Local Authority (LA) would expect given the existing Site of Nature Conservation Importance Local designation.</p> <p>The LA considers a more detailed botanical survey carried out at an optimal time of year, including a detailed inspection of the historic wall, would satisfy the LA information requirements.</p>
Q4 Compulsory Acquisition and Related Matters	
Q4.97 Q4.105	<p>The Council seeks confirmation regarding the land taken, in particular plots 152 to 162 and whether temporary or permanent acquisition is proposed.</p> <p>The Council is concerned about the temporary loss of open space at Deptford Church Street and the knock-on effects on surrounding open spaces. Further information regarding the impact on open space is set out in the Council's Local Impact Report (submission reference LBLew05).</p>
Q5 Design, Landscape and Visual Impact	
Q5.1-5.4	<p>Earl Pumping Station site is within View Corridor 5A.2, Greenwich Park. Deptford Church Street site is within View Corridor 6, Blackheath Point.</p> <p>St Paul's Church is in the middle ground of the View Corridor and the visual management guidance states that the panorama is sensitive to large-scale development in the middle ground. It is unlikely that the permanent above ground structures would have a negative impact on the View Corridor however the final design of the ventilation columns should be considered in this context.</p>

	<p>The Council wishes to see a height limit of 6 metres to the ventilation columns, particularly at Deptford Church Street where in addition to the View Corridor the columns would be adjacent to the Grade I listed St Paul's Church.</p>
<p>Q6 Development Consent Order Drafting and Related Matters</p>	
<p>Q6.9 and Q6.13</p>	<p>The definition of 'maintain' used in the Order is very wide and has been used to cover matters as wide as demolition and replacement. Such an open-ended power is not appropriate and the Council consider that the power of maintenance should not authorise any future development which would otherwise require separate planning permission from the local authority, and should not be able to depart from the detailed specifications which will apply to the construction work.</p> <p>The Council understands that the City of London, with the support of London Borough of Lewisham, have raised this issue with the Examining Authority.</p>
<p>Q6.67</p>	<p>An 8 week period for the discharge of major detailed Requirements is not considered long enough. In relation to landscaping at Deptford Church Street, the Council considers it is essential to include English Heritage as well as local residents and users such as St Joseph's School and St Paul's Church in developing the landscape design. An 8 week period is not an adequate timeframe for meaningful engagement and design development. As requirement DEPCS 4 – Landscaping is currently drafted a minimum 6-month period is required.</p>
<p>Q6.74</p>	<p>The Council understands that the London Borough of Tower Hamlets, with the support of London Borough of Lewisham, have submitted a borough wide response in relation to this question. The joint response covers Construction Management and Enforcement, the Role of Local Authorities, Communications and Community/stakeholder liaison, General Site Operation, Public access, the Highway and River Transport, Noise and Vibration, Water Resources and Ecology and Historic Environment.</p> <p>In addition to the borough wide comments submitted, the Council's view is that Part A of the CoCP is not satisfactory and the site-specific Part B documents are insufficiently detailed and precise. In combination they do not provide the level of environmental protection that is appropriate, or an appropriate level of guidance regarding the development of a</p>

<p>Q6.80</p> <p>Q6.85</p>	<p>CEMP. Further information is included in Annex 1.</p> <p>The final design of both works sites in LB Lewisham is the key aspect in the Council's view regarding the acceptability of the proposed permanent structures. The Council does not consider Requirement PW7 adequately ensures the design intentions will be carried forward into the detailed designs. In order for the Council to be satisfied sign off on detailed design elements is considered necessary. In relation to Deptford Church Street, to ensure the impact is acceptable, the Council's preference is that the costs for implementation of a scheme are agreed between the applicant and the Council and payment is made by the applicant, by way of a s106 obligation, in order for the Council to consult with the local community so as to develop and implement a suitable scheme.</p> <p>The landscape plan for Earl Pumping Station should be described as indicative and continue to be secured by Requirement EARPS5. The requirement should be amended for the Council to sign off on the final design.</p> <p>EARPS5 - Landscaping</p> <p>1) Before commencing construction of the permanent above ground structures, details of the permanent landscaping for this site shall be submitted to and approved in writing by the local relevant planning authority. in consultation with English Heritage where appropriate. Such details shall be in accordance with the indicative features on Landscape Plan (Drawing No. DCO-PP-21X-EARPS-220008) and the dDesign Principles for this site.</p> <p>2)The landscaping details in paragraph (1) above must, unless otherwise agreed in writing by the local relevant planning authority, include details of all proposed hard and soft landscaping works, including:</p> <ul style="list-style-type: none">a) location, number, species, size and planting density of any proposed planting;b) cultivation, importing of materials and other operations to ensure plant establishment;c) proposed finished ground levels;d) hard surfacing materials;e) minor structures such as lighting; andf) details of fencing/enclosures <p>3) The authorised development shall be carried out in accordance with the approved details unless</p>
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	otherwise approved agreed in writing by the local relevant planning authority.
Q8 Historic Environment	
Q8.4	The Council considers a site specific Requirement relating to the submission of an Archaeological Written Scheme of Investigation is necessary to ensure archaeology at Deptford Church Street is appropriately protected and managed.
Q8.16-8.17	The Council share the concerns of English Heritage regarding the combined effects of construction activities on St Paul's Church.
Q11 Noise and Disturbance	
Q11.2	The Council understands that the London Borough of Tower Hamlets, with the support of London Borough of Lewisham, have submitted a borough wide response that addresses noise and vibration, including comments on the noise insulation and temporary re-housing policy.
Q11.37	The LB Lewisham's Local Impact Report (submission reference LBLew05) sets out the Council's position regarding the impact of noise on St Joseph's Catholic Primary School. Furthermore, the Head Teacher and Chair of Governor's suggest mitigation in relation to noise arising from proposed works, as set out in Annex 2.
Q13 Policy	
Q13.1	See comments under SoCG below.
Q15 Socio-Economic Effects	
Q15.3-15.8	<p>The Council and the Applicant have had ongoing discussions regarding the use of the open space at Deptford Church Street as a works site, and the subsequent permanent works. No agreement has been reached to date. The design and quality of the resulting open space is the Council's primary concern in relation to the permanent works at Deptford Church Street.</p> <p>The final design of both the permanent above ground structures and the replacement open space and landscaping should reflect Council's strategic aspirations for the area and</p>

<p>Q15.18</p>	<p>reflect the needs and wants of the local community closer to the completion of works, particularly surrounding users such as residents, St Joseph's School and St Paul's Church.</p> <p>The Council's preference is that the costs for implementation of a scheme are agreed between the Applicant and the Council and payment is made by the Applicant, by way of a s106 obligation, in order for the Council to consult with the local community so as to develop and implement a suitable scheme.</p> <p>Particularly noisy construction activities should be programmed outside St Joseph's school term time or outside of the working school day and outside St Paul's Church congregation, service, performance times. Vehicle trips to and from the site should not take place 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time. The following wording is suggested for the CoCP Part B.</p> <ul style="list-style-type: none"> • All reasonable endeavours should be taken to programme particularly noisy work outside of school term time or outside of the working school day (08.30 to 15.30), and Church congregation and service times • All reasonable endeavours should be taken to programme vehicle trips to and from the site so that they do not take place between 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time, and outside of Church congregation and service times.
<p>15.21 & 15.23</p>	<p>Given the sensitivity of St Paul's Church and St Joseph's Catholic Primary School as receptors an automatic entitlement to noise insulation, without having to demonstrate an entitlement under the CoCP Part A, is appropriate This should comprise secondary glazing for the entire school building and such other arrangements as may be appropriate.</p> <p>St Joseph's Catholic Primary School's Head Teacher and Chair of Governor's suggest mitigation in relation to the proposed works, as set out in Annex 2.</p>
<p>15.24</p>	<p>In August 2012 the Council telephoned each of the businesses to understand better how they used Crossfield Street and what the anticipated effects of the proposed works would have on the operation of their businesses. Cumulatively the businesses estimated upward of 25 cars, 20</p>

	<p>vans and 15 lorries visiting per day. Each business has specific access requirements and said it was crucial to their on-going operations that access and parking was maintained.</p> <p>Some businesses are visited by large, articulated lorries, parking for up to half a day, other businesses deal with large fragile items that can not be easily moved or carried for long distances. All businesses receive frequent deliveries to their premises and these vehicles use Crossfield Street as a set down area while they pick up and drop off goods. Crossfield Street is used for parking by staff, customers, contractors and delivery vehicles.</p> <p>It is clear that any disruption to access or parking will severely impact on these businesses and will compromise their on-going operations. They provide crucial local employment in an area where unemployment figures are higher than the overall figures for the borough and Great Britain as a whole. The site is located in Evelyn Ward and is adjacent to New Cross where the unemployment figures are consistently higher than the London Average. The ONS Claimant Count September 2013 shows that the percentage of people claiming job seekers allowance was 6% in Evelyn Ward and 5.7% in New Cross Ward, compared to 4.7% for Lewisham and 3.6% for Greater London. In an area with consistently high unemployment rates, the loss of these businesses would have a significant adverse impact on local people and the local economy.</p>
<p>Q16 Traffic, Travel and Transportation</p>	
<p>Q16.5</p>	<p>Council officers are not aware of any agreement reached and have no evidence of any agreement reached.</p>
<p>SOCG</p>	
<p>Policy list</p>	<p>No agreement has been reached between the applicant and the Council regarding the draft SoCG. The draft SoCG provided by the applicant for comment (18 October 2013) included a list of policies. The Council has updated and attached this list at Annex 3, however it is noted that this will form part of the SoCG and is therefore a work in progress and subject to change.</p>

Annex 1

Submission reference LBLew03.1

Comments on the Code of Construction Practice, Parts A and B.

Part A: Structural Issues

1. Whereas it is easy to see the relationship between Part A of the CoCP and the ES, it is much harder to see its relationship to what actually happens on construction sites. This is because the real-life construction process is not organised in a thematic way, but by processes. Construction work develops in a predictable sequence from site establishment, clearance and preparation through (for example) groundworks, concreting, plant erection and installation, commissioning and testing (though the details will always vary according to the nature of the works being carried out).
2. To have a good chance of being fully and seamlessly implemented, a CoCP (and more particularly the CEMPs and the procedures that flow from it) should be organised to reflect the specifics of the construction process, so that a subcontractor detailed to (for example) erect the site hoarding, or to carry out site clearance, finds in one place all of the necessary standards and obligations which he is expected to deliver, whether they relate to noise, dust, tree protection or lighting (etc), rather than having to know that those obligations may exist, and having to find them in a thematically-organised CoCP or CEMP.
3. In this case the CoCP requires each site main contractor (see para 2.3.2 of Part A of the CoCP, ref 6.2.01) to produce a site-specific CEMP that will contain all of the following elements:
 - a pollution incident response plan;
 - an emergency preparedness plan;
 - a lighting management plan;
 - a traffic management plan;
 - a noise and vibration management plan;
 - an air quality management plan;
 - a water management plan;
 - details of site assessment and remediation (not described as a plan, but comparable in nature);
 - a site waste management plan;
 - an ecology and landscape management plan;
 - a heritage management plan;
 - a community liaison plan; and
 - resource management plans (with separate sub-plans covering water use, energy use and materials use).
4. Elsewhere within the CoCP are further requirements regarding other plans that are to be prepared, as follows:

- a construction phase plan (para 2.3.1);
 - a project incident plan (para 3.1.5);
 - a pollution incident control plan (para 4.10.6);
 - a green travel plan (para 4.15.1);
 - a construction logistics plan (para 5.1.6);
 - a system for monitoring and reporting on driver training and licensing (para 5.2.1(e)); and
 - a management and eradication plan for invasive species (para 11.4.2).
5. It is inevitable that there will be considerable overlap between several of these elements (e.g. between the pollution incident control plan and the pollution incident response plan; and between the construction logistics plan, the resource management plans and the traffic management plan). This is a recipe for confusion.
6. It would be appropriate to have a single process-oriented Construction Management Plan which balances all of the above environmental requirements, alongside (among other things) health and safety requirements, site security considerations, and employment law requirements. This would make it easier for the main contractor to generate co-ordinated and balanced work procedures appropriate to the tasks which will be carried out at the site concerned (ideally linked to the project management software being used, so that each task is clearly cross-referenced to relevant procedures). It would also make it easier for external parties (e.g. the Council) to check how concerns are to be addressed, and make it more likely that environmental considerations will be properly built into (for example) site staff induction procedures and briefings.
7. An emphasis on ensuring satisfactory outcomes rather than writing multiple plans is particularly relevant with sites such as those within LB Lewisham, which are only expected to employ small numbers of staff. Table 10.2.1 in each of the ESs for Earl Pumping Station and Deptford Church Street sites (ref 6.2.22 and 6.2.23) estimate the total workforce strength at 40 persons at each of the two sites: 15 site managers, 20 site workers and 5 client representatives.

Part A: Content Issues

8. It is assumed that there is a more limited scope for achieving changes to Part A of the CoCP and that changes to the proposed Part B plans will be more readily made.
9. Nevertheless, it is worth noting that although the chalk tunnelling spoil from the GFT is to be managed as a slurry, there is no mention in Part A of the CoCP of specific procedures or challenges appropriate to slurry handling. This is a major oversight given the proximity of more than one tunnelling drive site to the Thames and its tributaries (e.g. Deptford Creek). The only mention

of 'slurry' in any of the CoCP Part B plans is in the Chambers Wharf Part B document, and that is in relation to the control of plant noise rather than the management of risks to the water environment.

Part B: Content Issues at Earl Pumping Station

10. Some elements of the existing CoCP controls (whether in Part A or B of the proposed CoCP) are acceptable, particularly those relating to good practice measures for the control of noise and dust from work sites.

11. The issues at Earl Pumping Station of particular importance for LB Lewisham (and LB Southwark) are set out below. Inclusion within the list below should not be interpreted as suggesting that the matter is not already dealt with within the draft CoCP.
 - Site specific air quality and dust monitoring for naphthalene to be included during the excavation of the contaminated soils on site.
 - More specific and detailed controls should be put into Part B to restrict noisy and dust-generating activities outside standard site working hours,
 - Local residents should be invited to co-operate in a comprehensive pre-commencement programme of noise and dust monitoring so that baseline conditions are fully understood, and residents are properly informed regarding noise and dust issues before they arise.
 - Section 6 of Part B should also refer to the need to involve person(s) suitably qualified in the measurement and management of ground-borne noise and vibration (or this could be dealt with by amending Section 6.7 of Part A).
 - Further consideration should be given to extending the portion of the site hoarding to be provided to a height of 3.6m (rather than 2.4m). At present the only area offered such protection is an undefined area close to No.62 Croft Street. This matter should be considered in light of the fact that noise effects are expected to be significant at this site.
 - Further consideration should be given to the provision of additional noise (and dust) enclosures within the work site. In particular, consideration should be given to whether certain pieces of equipment (e.g. air compressors, pumps or emergency generators) or processes could be restricted to locations inside the existing site buildings.
 - Further consideration should be given to site layout in an effort to reduce to a minimum the double handling of excavation spoil (as a way of reducing noise and dust).
 - Site deliveries should be organised in such a way as to reduce to a minimum the total number of HGV movements. More frequent part-load deliveries (as might be required for a 'just-in-time' logistics plan) should be actively discouraged.
 - Stockpiles of excavation waste should be protected from the effects of heavy rainfall as a way of preventing run-off with entrained silt / soil particles. Interceptors and settlement tanks should be used to maintain an acceptable quality of surface water run-off where appropriate.

- No re-fuelling of vehicles should take place on site, and the storage of fuel, oil and other potentially hazardous chemicals should be minimised.
- Mains power should be used to the greatest possible degree, with no use of generators other than in an emergency.
- Artificial light levels outside the site should be no brighter than existing conditions.
- The height and scale of all cranes to be used on site should be kept to a minimum consistent with public safety.
- All concrete used on site should be delivered as pre-mixed concrete, with no use of on-site concrete batching.
- Provision should be made to harvest rainwater from the roofs of the existing Earl Pumping Station for use on site where potable-quality water is not required (e.g. for wheel washes, damping down of dust etc).

Part B: Content Issues at Deptford Church Street

12. Some elements of the existing CoCP controls (whether in Part A or B of the proposed CoCP) are acceptable, particularly those relating to good practice measures for the control of noise and dust from work sites.
13. The issues at Deptford Church Street of particular importance for LB Lewisham are set out below. Inclusion within the list below should not be interpreted as suggesting that the matter is not already dealt with within the draft CoCP.
 - All reasonable endeavours should be taken to programme particularly noisy work outside of school term time or outside of the working school day (08.30 to 15.30), and Church congregation and service times
 - All reasonable endeavours should be taken to programme vehicle trips to and from the site so that they do not take place between 08.00 and 09.00 and 15.00 and 16.00 Monday to Friday during school term time, and outside of Church congregation and service times.
 - More specific and detailed controls should be put into Part B to restrict noisy and dust-generating activities outside standard site working hours.
 - St Paul's Church and St Joseph's Primary School should be invited to co-operate in a comprehensive pre-commencement programme of noise and dust monitoring so that baseline conditions are fully understood, and to ensure that they are properly informed regarding noise and dust issues before they arise.
 - Section 6 of Part B should also refer to the need to involve person(s) suitably qualified in the measurement and management of ground-borne noise and vibration (or this could be dealt with by amending Section 6.7 of Part A).
 - Further consideration should be given to the provision of additional noise (and dust) enclosures within the work site, including for equipment such as air compressors, pumps and emergency generators.

- Further consideration should be given to site layout in an effort to reduce to a minimum the double handling of excavation spoil (as a way of reducing noise and dust).
- Site deliveries should be organised in such a way as to reduce to a minimum the total number of HGV movements. More frequent part-load deliveries (as might be required for a 'just-in-time' logistics plan) should be actively discouraged.
- Stockpiles of excavation waste should be protected from the effects of heavy rainfall as a way of preventing run-off with entrained silt / soil particles. Interceptors and settlement tanks should be used to maintain an acceptable quality of surface water run-off where appropriate.
- No re-fuelling of vehicles should take place on site, and the storage of fuel, oil and other potentially hazardous chemicals should be minimised.
- Mains power should be used to the greatest possible degree, with no use of generators other than in an emergency.
- Artificial light levels outside the site should be no brighter than existing conditions.
- The height and scale of all cranes to be used on site should be kept to a minimum consistent with public safety.
- All concrete used on site should be delivered as pre-mixed concrete, with no use of on-site concrete batching.

Part B: Content Issues at Greenwich Pumping Station

14. The main issue at Greenwich Pumping Station of concern to the Council is the handling, management and transport of excavation spoil, which requires a detailed section of its own within Part B of the CoCP in order to improve the level of protection afforded to Deptford Creek (half of which is in LB Lewisham) and the occupiers of land on the eastern side of the Creek (in LB Lewisham).

9.3 Monitoring and Reporting

15. The funding of a monitoring officer(s) and implementation of monitoring mechanism is necessary in order to cover equipment costs and officer time for site visits, review and assessment of information.

9.4 Wider Controls on Traffic

16. GPS tracking and clear labelling for every vehicle and a programme is needed for self enforcement. The applicant / contractor should submit a summary of vehicle tracking each month to the Council in order to show that construction lorries are adhering to prescribed construction routes. Vehicle tracking should be tied to a fine system. All aspects of vehicle tracking, summaries and fining to be paid for and administered by the applicant.
17. The construction environmental management plan should be for Local Authority approval with issues agreed prior to it being distributed to contractors.

18. CoCP A (para 3.1.2) requires a 'liaison plan' and identifies points of contact. This should be an additional requirement.
19. The transport management plan should be for Local Authority approval.
20. Transport Mitigation Impacts Fund to be utilised by the Borough council to deal with monitoring and review and mitigation of transport impacts.
21. Parking and traffic complaint hotline and performance standards for dealing with complaints and a "penalty system" for breaches of Travel Plan, to result in penalty payments to be paid into a Residents, Schools and Businesses Traffic Impact Fund.

Annex 2

Submission reference LBLew03.2

The Council's understanding of mitigation sought by St Joseph's School

In July 2013 the Council sought to understand the specific concerns of St Joseph's Catholic Primary School. Following a meeting between Council officers and St Joseph's Catholic Primary School's Head Teacher and the Chair of Governors, the Council understands that the following are the primary concerns about the functioning of the School during the construction period and how they ought to be addressed, in order to mitigate the adverse impacts.

Dust and noise:

- That there should be replacement windows provided that are tightly sealed to prevent dust entering the school buildings.
- That secondary glazing would be most effective in reducing noise.
- That the fire doors need to be replaced to seal against dust. The existing two fire doors are not tightly fitted and have gaps where dust enters.
- That the possibility of a temporary fence along the boundary with Crossfield Street for the duration of works to help keep out noise and dust should be considered.

Loss of open space:

- That an astroturf surface should be provided on the football pitch.
Regular cleaning / maintenance to avoid negative impacts from dust.

Maintenance and upkeep:

- That additional window cleaning is needed to address dust pollution from the works site.
- That additional indoor cleaning is needed to address dust pollution from the works site.

Access:

- That an additional 'lolly-pop' person is needed to assist with crossings.
- That the possibility of a shuttle bus service at peak times should be given proper consideration.

Liaison and communications:

- That there should be full and proper liaison with the school throughout the construction period.
- That the applicant should run sessions / teach ins at the school about the works, the process, construction, ecology etc.

Additional works sought by St Joseph's:

- That thermal lining to the loft ought to be provided by the applicant

Policy context

Local Planning Authority – The London Borough of Lewisham Worksites – Deptford Church Street & Earl Pumping Station				
Policy document	Policy reference	Policy subject	Applicant's comment	LPA's comment
Development Plan Documents				
Core Strategy	Objective 5	Core Strategy Objective 5: Climate Change Requires the Council to take action to ensure that climate change is adapted to and mitigated against, including measures necessary to create a low carbon borough and reduce carbon emissions	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Objective 6	Flood risk reduction and water management Requires the council 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	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Objective 10	Protect and enhance Lewisham's character	The project has been developed in the	

		Requires that all new development in Lewisham to adhere to the Council's aspirations in protecting Lewisham's distinctive local character, in particular the borough conservation areas and listed buildings whilst improving the environment within key regeneration and growth areas of Lewisham and Deptford.	knowledge of this local planning policy.	
Core Strategy	Objective 11	Community and Well being Requires that the Council supports measures and initiatives that promote social inclusion and strengthen the quality of life and well-being for new and existing residents of the borough.	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 7	Climate Change and adapting to the effects Requires the Council to adopt a partnership approach to implement the principles of 'avoidance, mitigation and adaptation' to reduce Lewisham's CO2 emissions.	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 8	Sustainable design and construction and energy efficiency Requires the new development to comply with the Core Strategy policies on sustainable movements, local air quality, flood risk reduction and water management, sustainable design, open	The project has been developed in the knowledge of this local planning policy.	

		space and waste management. Applications for all major developments are required to submit a Sustainability Statement and provide an Energy Statement.		
Core Strategy	Policy 9	Improving local air quality Requires the Council to adopt a partnership approach to implement national policy, London Plan policy and the actions outlined in the Council's Air Quality Management Plan	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 10	Managing and reducing the risk of flooding Requires the applicant to demonstrate that the proposal will deliver a positive reduction in flood risk to the Borough, whether that be by reducing the frequency or severity of flooding.	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 12	Open Space and environmental assets Requires that all development proposals in the borough to preserve and promote biodiversity	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 13	Addressing Lewisham's waste management requirements Requires that all major developments to submit and implement a Site Waste Management Plan	The project has been developed in the knowledge of this local planning policy.	

Core Strategy	Policy 14	<p>Sustainable movement and transport</p> <p>Requires that the applicant to submit travel plans which meet or exceed the Department of Transport's thresholds for transport assessment and TfL guidance.</p>	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 15	<p>High Quality design for Lewisham</p> <p>Requires that all development proposal to comply with the national and regional policy and guidance to ensure highest quality design</p>	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 16	<p>Conservation areas, heritage assets and the historic environment</p> <p>Requires that the Council ensures that all borough heritage assets, including Conservation Areas, , listed buildings, archaeological remains and historic parks and gardens, are monitored and conserved according to the requirements of government planning policy guidance, London Plan policies and local policy.</p>	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 17	<p>The protected vistas, the London panorama and local views, landmarks and panoramas</p> <p>Requires that the new development does not impede or detract from local views or</p>	The project has been developed in the knowledge of this local planning policy.	

		obscure local landmarks		
Core Strategy	Policy 18	The location and design of tall buildings Requires that development proposals adhere to the Council's policy on design of tall buildings	The project has been developed in the knowledge of this local planning policy.	
Core Strategy	Policy 21	Planning Obligations Requires that development proposals may be subject to planning obligations	The project has been developed in the knowledge of this local planning policy.	
Strategic Site Allocation	Plough Way	Requires that redevelopment proposals of this site to adopt a comprehensive phased approach in line with an approved mater plan	The project has been developed in the knowledge of this local planning policy.	
Spatial Strategy	Spatial Policy 1	Spatial Strategy Requires that all new development need to contribute positively to the delivery of the vision for Lewisham and the borough's strategic objectives (detailed in Section 5 of the policy)	The project has been developed in the knowledge of this local planning policy.	
UDP	Saved Policy URB 12	Landscape and Development Requires that applications for development should , where appropriate, include landscape proposals for all areas not occupied by buildings, and be based on a landscape appraisal. New development proposals should accommodate Sustainable Urban Drainage Techniques within the	The project has been developed in the knowledge of this local planning policy.	

		landscape proposals where appropriate. It also requires that where trees are removed, replacement trees will be required		
UDP	Saved Policy URB 13	Trees Requires the developer, as a condition of planning permission, to retain existing trees and to plant appropriate new ones where appropriate and practical.	The project has been developed in the knowledge of this local planning policy.	
UDP	Saved Policy ENV.PRO 9	Potentially Polluting Users Requires the application for proposed development to be assessed against the following criteria: the impact on neighbouring uses including loss of amenity, the design and appearance of the development, operational use, the hours of operation, transport requirements, environmental assessment, and waste strategy	The project has been developed in the knowledge of this local planning policy.	
UDP	Saved Policy ENV. PRO 11	Noise Generating Development Requires the developer to provide a detailed noise impact survey outline		
UDP	Saved Policy ENV. PRO 12	Light Generating Development Requires that proposals for light-generating development might require a detailed light impact survey outlining possible attenuation measures.	The project has been developed in the knowledge of this local planning policy.	

UDP	Saved Policy ENV PRO 17	Management of the Water Supply Requires the Council to encourage techniques which improve water quality, and minimise adverse impacts on water resources, on the quality, regime and ecology of rivers and on groundwater.	The project has been developed in the knowledge of this local planning policy.	
UDP	Saved Policy HSG4	Residential Amenity Requires that the Council seek to improve and safeguard the character and amenities of residential areas through the Borough	The project has been developed in the knowledge of this local planning policy.	
Development Management Local Plan	DM Policy 1	Presumption in favour of sustainable development		
Development Management Local Plan	DM Policy 23	Air quality		
Development Management Local Plan	DM Policy 25	Landscaping and trees		
Development Management Local Plan	DM Policy 26	Noise and Vibration		
Development Management Local Plan	DM Policy 27	Lighting		
Development Management Local Plan	DM Policy 28	Contaminated Land		
Development Management Local Plan	DM Policy 30	Urban design and local character <ul style="list-style-type: none"> • <i>General principles</i> • <i>Detailed design issues</i> 		
Development Management Local Plan	DM Policy 35	Public realm		

Development Management Local Plan	DM Policy 36	<p>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.</p> <ul style="list-style-type: none"> • <i>A. General principles</i> • <i>B. Conservation areas</i> • <i>C. Listed Buildings</i> • <i>D. Scheduled Ancient Monuments and Registered Parks and Gardens</i> 		
Other Policy Documents				
Deptford New Cross Master Plan (November 2007)				
North Lewisham Links (June 2007)				