



Local Development Framework
Issues and Options Paper

OPEN SPACE & BIODIVERSITY



London Borough of Lewisham
Planning Policy September 2005

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ISSUES AND OPTIONS PAPER: OPEN SPACE AND BIODIVERSITY

PART I: INTRODUCTION

1. WHAT IS THIS PAPER ABOUT?

This issues and Options discussion paper relates to the London Borough of Lewisham's (the Council) preparation of the Spatial (Core) Strategy and the Development Policies and Site Allocations, Development Plan Documents in the Local Development Framework. It has been prepared to present issues and possible options associated with Open Space and natural habitats. More specifically, this paper will explore in detail the following issues: -

- Open Space Provision – Dealing with the Deficiencies
- Protecting and enhancing the provision and quality of Open Space in the Borough
- Open Space Provision – quality and maintenance
- Protection and enhancement of natural habitats and biodiversity
- Protection and Enhancement of Open space Links and Corridors

These issues for discussion stem from some over-arching issues / inadequacies identified through consultation and audits carried out for the 'Open Space Strategy for Lewisham 2005-2010'. This document identified the following issues:

- Insufficient open space to provide for recreational opportunities, aesthetic value and to provide for people's health and well being.
- Current open space provision lacks strategic location and design.
- Activities within, and adjacent to, open space can have adverse effects on the environment and adjoining sites

The London Borough of Lewisham recognises that the Council has certain responsibilities relating to Open Space having land use planning control. National policy guidance also directs councils to undertake assessments of needs and audits of existing facilities and advises that planning obligations be used to remedy deficiencies. As such the Council must provide an adequate framework within the Core Strategy and Development Plan Documents to enable the public to enjoy the benefits of Open Space in a way that meets the objectives of sustainable development.

1.1 THE LOCAL DEVELOPMENT FRAMEWORK

The Local Development Framework (LDF) will provide the overall planning strategy for Lewisham, made up of a number of separate but inter-related policies and plans. **The Spatial Strategy** will be that part of the planning framework that will set out the planning aims and objectives for the borough as a whole. All the other documents in the Local Development Framework must be consistent with it.

The Development Policies and Site Allocations document is being prepared alongside the Spatial Strategy. It will provide the framework for the detailed implementation of the strategic aims and objectives to be found in the Spatial Strategy. It will include a set of policies by which applications for new development will be judged. More detail about the LDF can be found in the Local Development Scheme (LDS), and the leaflet 'A guide to the new planning system' available on request. The LDS is the project plan that gives the timetable for the preparation for all the documents in the LDF. It can be found on the Council's website at www.lewisham.gov.uk/Environment/Planning/PlanningPolicy/LocalDevelopmentFramework/LocalDevelopmentScheme.htm

2. WHAT IS THE ROLE OF THE COMMUNITY AND STAKEHOLDERS?

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

- What you think of the options presented;
- What improvements could be made to the options;
- What option(s) are your preferred options that you want the Council to take forward;
- Any options we haven't considered that you would like us to consider before identifying a preferred option(s).

In thinking about the options presented, it must be remembered that the preferred option may not be a single discreet option presented below, but rather may be a combination of a range of options taking the best parts of each.

3. BACKGROUND / THE EVIDENCE BASE

Open space is important for both community well being and environmental health. When living and working within the bustle of modern inner-city life, the significance of local parks and open spaces cannot be underestimated. Many people regard the provision and quality of open space in their area as an integral part of what constitutes the quality of life. Open space is also important for health, and the perception of the area within which they live, work and learn. These facilities can play an important role in attracting and retaining residents as well as businesses, and therefore play an active role in socio-economic regeneration and sustainable neighbourhoods.

As the basis for the development of the (recently adopted) **Open Space Strategy for Lewisham 2005-2010**, the Council undertook an audit of existing Open Spaces over 0.3ha including quantity, quality, use, function, facilities and accessibility.

In-depth borough wide consultation was also undertaken to assess the community's aspirations, needs and levels of satisfaction with parks and open spaces, as well as a demographic study of the population.

The information and data gathered from this process enabled areas of deficiency to be highlighted and current trends to be identified as well as setting out priorities for action. This information has been used to inform this Issues and Options Paper.

Results: With 415ha of Public Open Space and a resident population of 248,922 (2001 Census), Lewisham has a low provision of 1.67ha per 1000 population, when compared to the traditional 2.43ha per 1000 population (National Playing Field Association '6 acre standard'). However, the 4 acre (1.6ha) standard identified in the Abercrombie Plan of 1943, was considered to better reflect inner-city land-use circumstances and hence provides a more realistic standard for Lewisham.

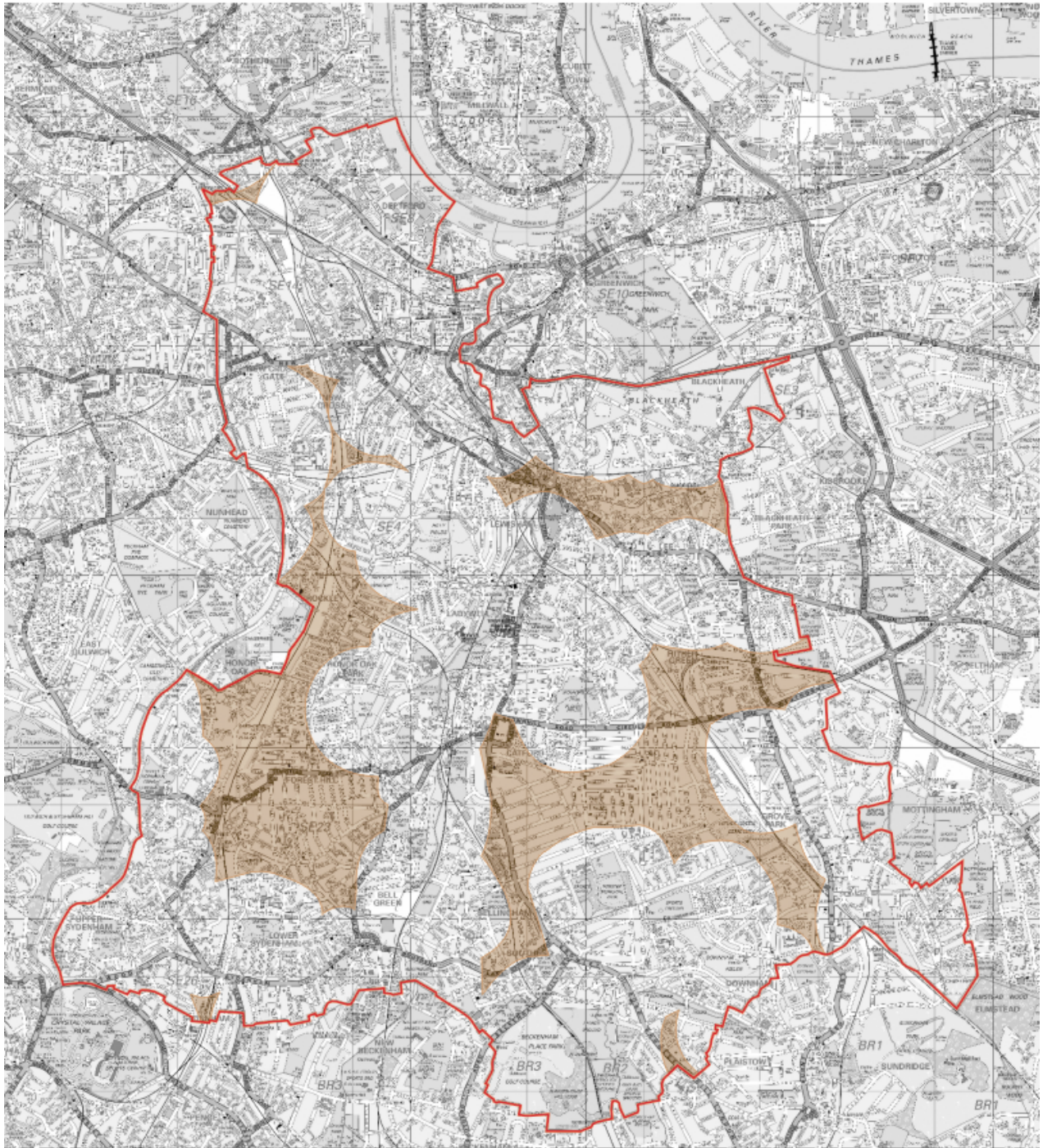
A number of areas across the Borough are deemed deficient in public open space in terms of access to both Local and the larger District parks (see maps following). Pockets of deficiency can be found over the whole Borough with the largest proportion covering an area across the south centre of the borough and in particular the Crofton Park, Perry Vale and Catford South wards. Overall it has been calculated that 19.45% of the Borough can be considered to have an Open Space deficiency (based on Open Space Strategy figures). Deficiencies have been noted for all types of Open Space including Metropolitan Open Land, Public Open Space, Urban Green Space and nature reserve lands.

Community consultation for the Open Space Strategy revealed that one fifth of respondents who do not use open spaces cited the reason for this as 'they are not near me'.

Quality of our Open Spaces has also been identified as an issue throughout the consultation, with the majority of our larger parks scoring less than 75% satisfaction ratings, and many smaller ones scoring less than 45% satisfaction.

NOTE: The following three maps depict the Areas of Open Space Deficiency which have been identified through the Open Space Strategy process. We recognise that the quality of the maps does not translate well to black and white copying, but they are only meant as a guide. To view the proper maps we suggest you look at those contained in the actual Open Space Strategy for Lewisham 2005-2010 which is on the Council's website at www.Lewisham.gov.uk

OPEN SPACES LANDSCAPE FRAMEWORK

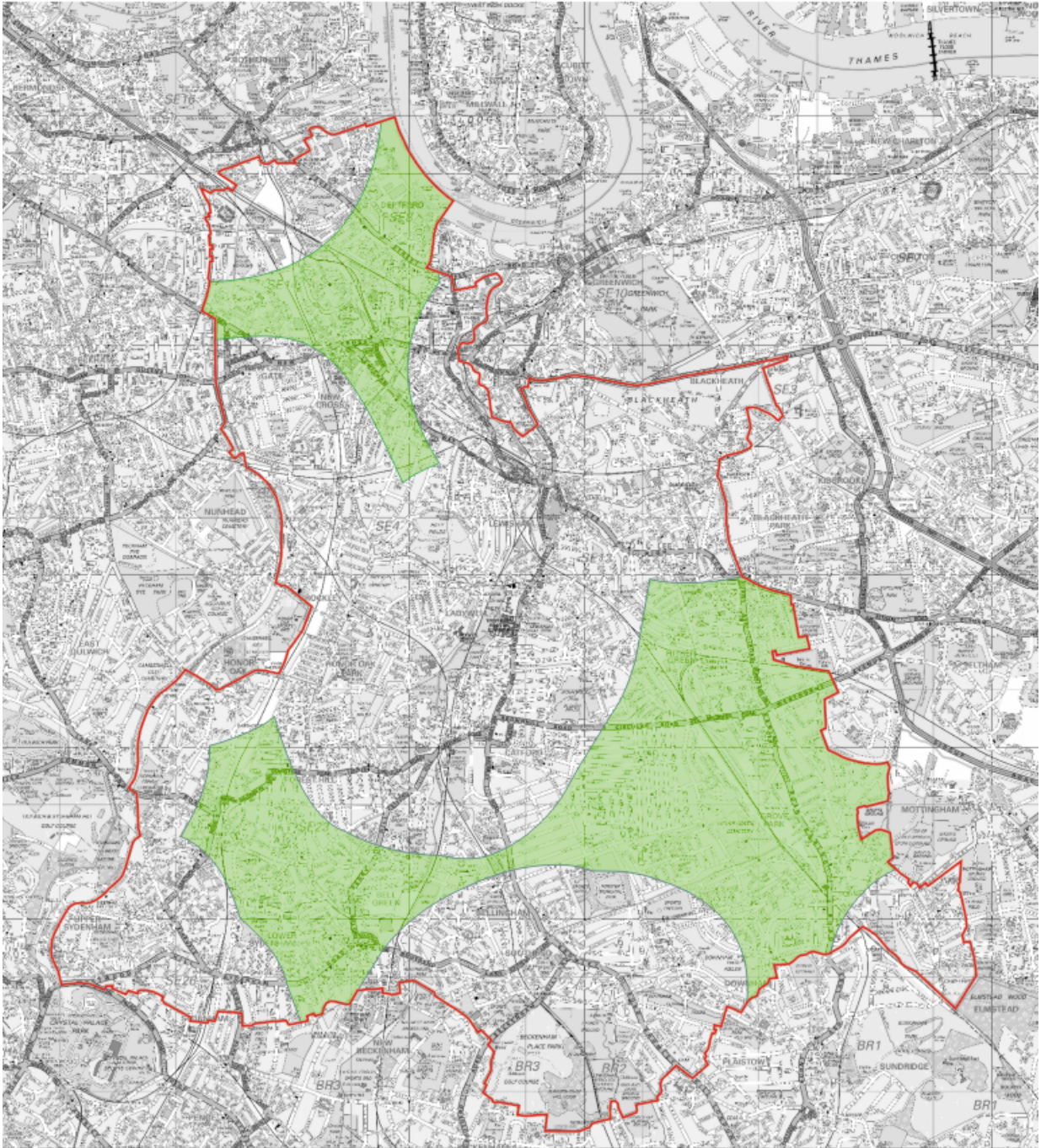


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**Area of Local Park Deficiency (Nov 2004):
Area 400m or more from access to
Public Open Space (0.3ha or larger)**

Geographic Information & Research 2005
Barts OS Strategy Local.cdr

OPEN SPACES LANDSCAPE FRAMEWORK

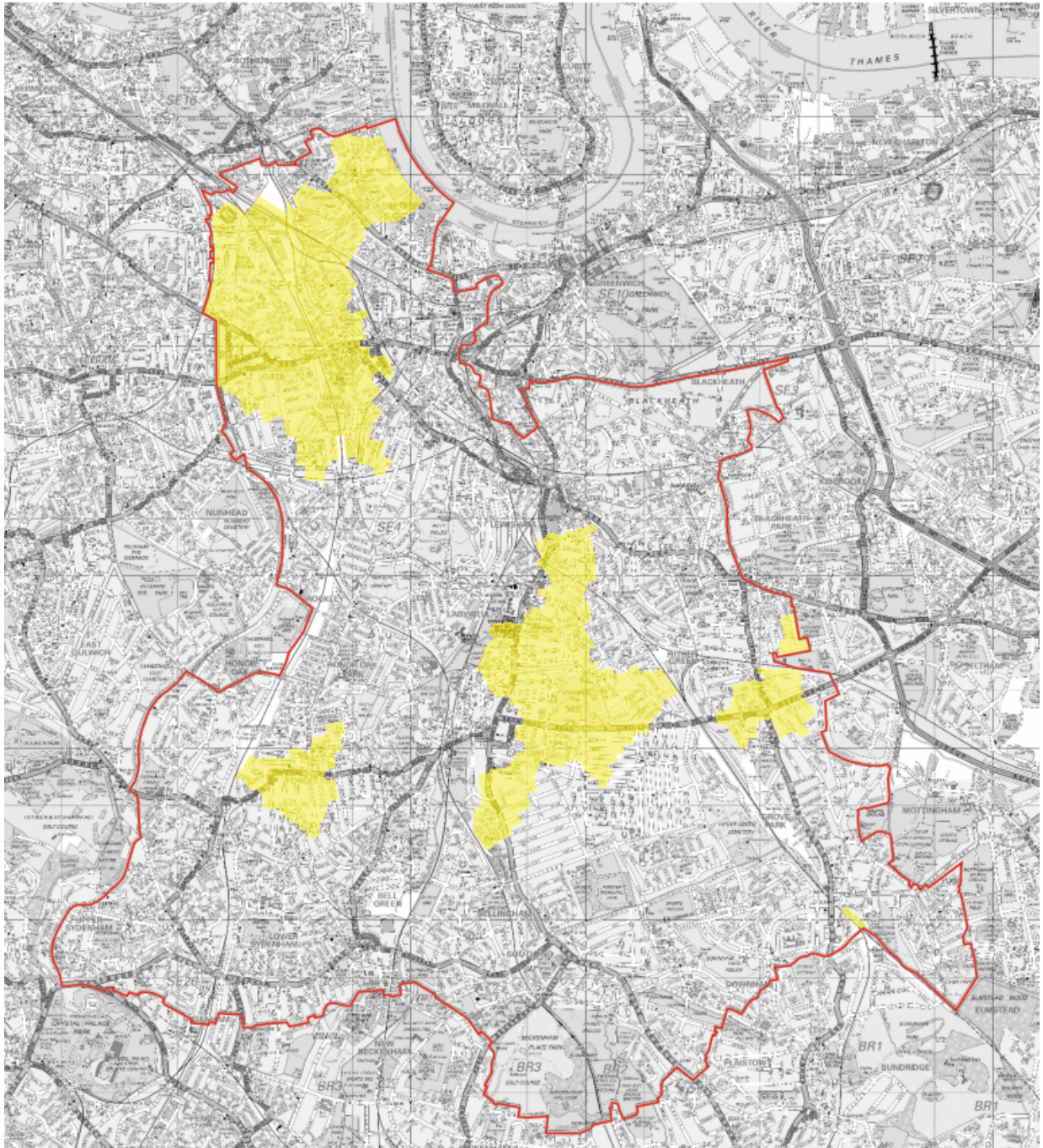


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**Area of District Park Deficiency (Nov 2004):
Area 1200m or more from access to
Public Open Space (20ha or larger)**

Geographic Information & Research 2005
Barts OS Strategy District.cdr

OPEN SPACES LANDSCAPE FRAMEWORK



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**Area of Nature Conservation Deficiency (Nov 2004):
Areas more than 1km actual walking distance from
sites of importance for nature conservation, that
give good hands-on experience of nature (SINC)**

Geographic Information & Research 2005
Barts OS Strategy Nat Cons.cdr

PART II: DISCUSSION OF THE ISSUES AND POSSIBLE OPTIONS

4. ISSUE 1: OPEN SPACE PROVISION – DEALING WITH THE DEFICIENCIES

4.1. WHAT IS THE ISSUE?

Consultation into what people value most about living in London has revealed that open space plays a large role in a community's satisfaction with their living and working environment.

As identified in the research for the Open Space Strategy, Lewisham has a deficient amount of open space for its population, relative to other boroughs and policy guidance. The issue is therefore what we can do to address the current inadequacies and prevent further loss of this valuable community resource.

The principle role of the land use planning system with respect to Open Space is to protect it from development (as directed in the UDP). The Council recognises its role in ensuring development does not adversely affect the values of existing Open Space and that measures are taken to ensure areas of deficiency are minimised and remedied.

Targets need to be set to ensure deficiencies are not left to worsen, but that there is adequate provision of recreation and conservation land to meet the needs of the community. In order to achieve this it will also be necessary for the council to monitor changes in demographics and social trends.

4.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

4.2.1. THE LONDON PLAN

The London Plan identifies the need to promote and protect areas of Open Space for their recreational, amenity and biodiversity values.

The Plan contains policies which encourage identifying areas of open space deficiencies and priorities for addressing them.

4.2.2. PPG 17: PLANNING FOR OPEN SPACES, SPORT AND RECREATION:

PPG 17 advises that local planning authorities should first undertake assessments of open space needs and opportunities and audits of existing provision. The information gathered should then be used to set local standards for the provision of open space in their areas. These should include qualitative, quantitative and accessibility elements. This was done for the Lewisham Open Space strategy 2005-2009.

It also directs that an adequate supply of open space is maintained and that existing open space is protected.

4.2.3. GAME PLAN 2002

'Game Plan' is a Government Strategy aimed at establishing a culture of participation in sport and physical activity as a tool to reduce heart disease, diabetes, crime and social disorder and increase education.

The Government has set a target of 70% of the population (compared to 30% currently) to be reasonably active by 2020 (i.e. 30 minutes of moderate exercise 5 times a week). To action this change it recommends an holistic approach addressing barriers to participation as well as failures in provision (such as poor supply of facilities).

4.2.4. UNITARY DEVELOPMENT PLAN 2004 (UDP)

Policy OS 8 commits the Council to creating new public space, enhancing public access to existing public space and negotiating with developers for new provision in areas identified as being deficient in Public Open Space.

4.2.5. OPEN SPACE STRATEGY FOR LEWISHAM 2005-2010:

This document follows on from the direction of PPG 17 by assessing the availability and adequacy of open spaces in Lewisham and also identifies deficiencies and public use.

It aims to protect open space from inappropriate development and highlights the need to enhance and improve the amount and quality of open space, and accessibility to open spaces.

The Open Space Strategy sets a target of 1.7ha Open Space availability per ward per 1000 population by 2006 and 1.75ha by 2010. This therefore sets an increase of open space of 0.8ha per 1000 people.

4.3. OPTIONS FOR ADDRESSING THE ISSUE – CORE STRATEGY POLICIES

OPTION	NAME	DESCRIPTION
Core Strategy Option 1.1	To protect existing and increase the provision of all types of Open Spaces in the Borough to a standard of 1.7 hectare per 1000 population	This standard has been set through the Open Space Strategy approval process. It represents an increase in open space provision, while accepting the inner-city nature of the Borough and the limitations this imposes

4.4. OPTIONS FOR ADDRESSING THE ISSUE – DEVELOPMENT CONTROL

OPTION	NAME	DESCRIPTION
Option 1.1	The Borough adopts a target of 1.7ha/1000 head of population average of Open Space by 2006 and 1.75ha by 2010 over the whole of the Borough	Setting a target for the Borough is consistent with PPG17. The target of 1.7ha per 1000 population is consistent with the Open Space Strategy which has been through public consultation and has been adopted by Council. It shows a desire to improve the current deficiencies of open space in Lewisham (as compared with other London boroughs).
Option 1.2	Borough maintains 1.67ha/1000 head of population average, with no aim to increase	This target is still within the 1.6ha/1000 average set in the Abercrombie Plan for inner-city boroughs. It does not show any real effort to remedy deficiencies, but may still help to protect existing areas as well as preventing future development from lowering the amount of open space. This target deviates from that set out in the Open Space Strategy.
Option 1.3	Target of 1.7ha/1000 head of population average of Open Space set over areas of deficiency as defined in UDP maps by 2006 and 1.75ha by 2010	By targeting only the areas of deficiency, the actual areas which lack open space are being addressed. This could prove difficult if the areas are already intensely developed as new space may not be a reality. Alternatives such as improving accessibility could be a better option for such places. This target would still be consistent with the UDP and the Open Space Strategy.

5. ISSUE 2: PROTECTION AND ENHANCEMENT OF OPEN SPACE AND AVOIDING INAPPROPRIATE DEVELOPMENT

5.1. WHAT IS THE ISSUE?

Activities on open space areas can potentially result in adverse effects on the environmental qualities of the site and adjoining properties. It is therefore important that such activities are managed in such a way that avoids, remedies or mitigates these effects. The same can be said of adjoining properties and development, and the potential for spill-over effects onto areas of open space.

In order to protect and enhance open space provision and quality, it is necessary to place restrictions on development. How we implement protection measures can become problematic under the current hierarchy of Open Spaces. Metropolitan Open Lands and Public Open Spaces currently have a relatively higher level of protection from development, whereas Urban Green Spaces, which are more likely to be privately owned, are left relatively vulnerable to new proposals. Regardless of this, the values of all open spaces are important and worthy of some level of protection for the greater public good.

5.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

5.2.1. PPG 17: PLANNING FOR OPEN SPACES, SPORT AND RECREATION:

The long term outcomes PPG 17 aims to deliver in relation to this issue are;

- An appropriate balance between new provision and the enhancement of existing open space
- Clarity and reasonable certainty for landowners and developers regarding the requirements and expectations of councils in respect of open space

5.2.2. UNITARY DEVELOPMENT PLAN (UDP)

Policy OS11 Sport and Recreation states that planning permission for development that would result in the loss of or damage to outdoor sport and recreation land will not be permitted.

On MOL planning permission will only be granted when it preserves the open space nature of the land or enhances the uses of the land for the public good (e.g. recreation, nature conservation, cemeteries, woodlands). Development proposals on land close to MOL will be considered in relation to their detrimental impact on visual amenity, character or use of the MOL.

The UDP permits some development of POS and UGS if it is ancillary to the open space enjoyment, enhances public access or makes provision nearby for replacement open space of equal or better quality and size.

5.2.3. OPEN SPACE STRATEGY FOR LEWISHAM 2005-2010

Action 1 of the Strategy directs the Council to protect all open space from inappropriate built development, particularly on Metropolitan Open Land and sites that are within or close to an area of deficiency for Public Open Space or Site of Importance for Nature Conservation (SINC).

5.3. OPTIONS FOR ADDRESSING THE ISSUE – CORE STRATEGY POLICIES

OPTION	NAME	DESCRIPTION
Core Strategy Option 2.1	To protect existing open space from inappropriate development and take opportunities to enhance	This is the basic level of what is directed through PPG 17 and the London Plan, the UDP and the Open Space Strategy for Lewisham.
Core Strategy Option 2.2	In addition to protecting existing open space, the Council will seek to identify priority areas and to create new public open space and/or enhance public access to existing public space	This policy is in line with Government direction through the London Plan and PPG 17 and represents a step towards making the community a better place to live through the principles of sustainable development.

5.4. OPTIONS FOR ADDRESSING THE ISSUE – DEVELOPMENT CONTROL

OPTION	NAME	DESCRIPTION
Option 2.1	The Council to refuse planning permission for developments within any open space that is likely to result in an adverse effect on its use, management, amenity or enjoyment	Protection of open space values through planning permissions to ensure no development allowed that could result in loss of or damage to recreation or nature conservation land. This would include buildings associated with their use, which can also result in adverse effects (e.g. related to proportion, views)
Option 2.2	The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a	This policy option would help ensure development of adjacent sites, or sites within the visual catchments of an open space, does not compromise its values. Effects of adjoining developments can result in a number of adverse effects such as domination of the built form due to scale, shading, obscuring views to green space,

	visual relationship with any open space that is likely to result in an adverse effect on its use, management or enjoyment	accessibility issues, traffic, safety concerns to name a few.
Option 2.3	The Council to refuse planning permission for developments on land fringing, abutting or otherwise having a visual relationship with MOL that is likely to result in an adverse effect on its use, management or enjoyment	Policy direction such as this would award MOL greater protection from inappropriate development. It is based upon the existing hierarchy and legal definitions of open space rather than the uses or amenity values.
Option 2.4	The Council to protect all MOL and POS from inappropriate built development but adopt a more permissive approach to development on private open space / UGS based on criteria such as: <ul style="list-style-type: none"> • Design • Scale • Visual amenity • Views • Light 	This policy is essentially awarding public open space and MOL a greater level of protection from development than private urban green space. It would allow certain development to occur on private open space, while still providing a level of control over the type.
Option 2.5	Requirement that any new development sets aside 1.7ha/1000 head of population average of Open Space	To give effect to the Open Space Strategy's target, new development could be required to provide open space of the size prescribed. This would be relative to the amount of development and increase in population. This would ensure that regeneration and development maintains and enhances open space in the borough. It is acknowledged that in intensive developments, however, land space on the actual site may be difficult to obtain to that level.
Option 2.6	Development contributions to acquire land or cash for future acquisition of land, or for maintenance of nearby open space, relative to the increase in population pressure	Where there is insufficient open space within the area of land being developed, or the land is not suitable for use as open space, then financial contributions should be taken in money, to help acquire suitable open space or improve existing areas. This should be of direct benefit to the environment receiving the increased level of development rather than going into a 'pool' of funds for borough-wide use to ensure that areas of deficiency do not increase.
Option 2.7	Council to negotiate with landowners to open up private open spaces to allow public access	This appears to be the most easily implemented option at this stage when considering budget constraints and would not just be a reactive response to a planning application. Incentives would most likely be needed and there could be issues surrounding who has maintenance and management responsibilities.
Option 2.8	An assessment of the availability of brown space to be designated for open space regeneration?	An assessment of areas with potential for open space regeneration could provide a more strategic approach to identifying potential for future open space provision.

6. ISSUE 3: OPEN SPACE PROVISION – QUALITY AND MAINTENANCE

6.1. WHAT IS THE ISSUE?

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

It has been widely recognised that improving the state of our parks is vital to delivering an urban renaissance and restoring pride in our neighbourhoods.

Well designed and managed spaces can help bring communities together, provide a place to meet and recreate. Poor maintenance and management of park spaces on the other hand, can deter people from visiting and using and appreciating these spaces. Barriers to participation can include fear of crime / feeling unsafe, traffic, lack of facilities / things to do, mess (e.g. dog mess, rubbish) and accessibility for disabled.

Considering that the Borough has a deficiency of open space provision, it is even more important that the open spaces we actually do have are of the best quality practicable. Audits of quality will also allow us to identify potential for increased use through better design, maintenance and management.

6.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

6.2.1. GREEN SPACES, BETTER PLACES: THE URBAN GREEN SPACES TASKFORCE, DTLR 2002

This report expresses concern about the decline in the quality of our parks. It identifies a need for a strategic policy framework in which all decision makers operate and appropriate quality standards for parks and green spaces.

Recommendation R37 states that 'local authorities develop and implement a green space strategy which integrates with neighbourhood renewal, regeneration, planning and housing development, community development, local health improvements, and culture, children's play and sports strategies'

6.2.2. PPG 17: PLANNING FOR OPEN SPACE, SPORT AND RECREATION

PPG 17 guides Councils to seek opportunities to improve the value of existing facilities and suggests better management or capital investment or planning obligations to achieve this. It also encourages better accessibility of open spaces and sports grounds and good design to reduce crime.

6.2.3. OPEN SPACE STRATEGY FOR LEWISHAM 2005-2010:

The Strategy sets clear objectives to be actioned on a practical level. These include prioritising capital bids for certain parks with a view to applying for Green Flag status, prioritising for provision of park keepers. It also stresses the need to enhance and improve the level of quality of open space, and accessibility to open spaces and to promote environmental education throughout Open Space areas

6.2.4. UNITARY DEVELOPMENT PLAN (UDP)

The overarching theme of the UDP policies on open space is to protect and, where possible, enhance their quality.

It generally supports proposals that enhance the recreational and nature conservation uses of parks and sportsfields.

To prevent the loss of amenity value, the UDP suggests Tree Protection Orders as one method.

6.3. OPTIONS FOR ADDRESSING THE ISSUE – CORE STRATEGY POLICIES

OPTION	NAME	DESCRIPTION
Core Strategy Option 3.1	To improve the quality of all types of Open Spaces in the Borough, to ensure their use is	In a Borough where deficiencies exist in relation to Open Space provision, it is important that existing spaces reach their maximum potential. Government guidance has expressed a desire for improved public spaces. Public consultation has revealed that the

	maximised for the purposes of which they are created.	public has been increasingly more satisfied with the quality of our open spaces and this should continue.
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6.4. OPTIONS FOR ADDRESSING THE ISSUE – DEVELOPMENT CONTROL

OPTION	NAME	DESCRIPTION
Option 3.1	Adopting the Actions documented in the Open Space Strategy for Lewisham 2005-2010.	The Actions in this document outline priority areas for management and investment of funding. The priorities have been set as a reaction to public consultation and quality audits of our open spaces. They therefore deal with the on-the-ground maintenance and management of open spaces that are not part of planning policy.
Option 3.2	Setting quality standards and criteria to assess current situation and priorities for improvements and on-going public consultation to gauge satisfaction with open spaces	This could be much like the standards under which the Green Flag status is assessed. It gives a starting point for what improvements or declines can be measured against. Public perceptions of parks qualities could be used to gauge quality and maintenance levels.
Option 3.3	In areas of deficiency the Council will not permit development which will adversely affect accessibility to open space	Development which could inhibit access to public open spaces would not be given planning permission. This would be the bottom line approach to regional and local policy guidance seeking that accessibility is maintained and enhanced.
Option 3.4	In areas of deficiency the Council will seek section 106 development contributions to improve quality of public open spaces facing the increased pressure	A development which will increase pressure (whether population, traffic, noise) on a public open space would be required to contribute to the resources they are creating a strain on. If they were not required to contribute land itself, then cash contributions could be used to upgrade facilities, improve access and maintenance etc.

7. ISSUE 4: PROTECTION AND ENHANCEMENT OF NATURAL HABITATS AND BIODIVERSITY

7.1. WHAT IS THE ISSUE?

Open Space areas provide the majority of the Borough's most significant and whole habitats for flora and fauna species. Open spaces can also provide important linkages between significant ecological sites.

When living in such an urban environment, and indeed generally, it is important that these areas are protected, not only for their intrinsic flora and fauna values, but in recognising that healthy functional ecosystems can contribute to a better quality of life and a sense of well-being for those who live and work in urban areas.

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

Government direction regarding the use of land and natural resources is to make adequate provision for development and economic growth whilst ensuring effective conservation of wildlife and natural features as an important element of a clean and healthy natural environment.

Many sites of local nature conservation importance have been given designations by local authorities. These sites often afford people in the community the only opportunity of direct contact with nature.

7.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

7.2.1. EUROPEAN COMMUNITY BIODIVERSITY STRATEGY 1998:

The main aims of this strategy to be filtered down are:

- The conservation and sustainable use of biological diversity (ecosystems in their natural surroundings).
- To increase research, identification, monitoring and exchange of information relating to biodiversity, and;
- To increase education, training and awareness of biodiversity

7.2.2. DRAFT PPS9 BIODIVERSITY AND GEOLOGICAL CONSERVATION

Draft PPS9 provides important guidance in promoting sustainable development by ensuring that policies and decisions about the development and use of land integrate biodiversity with economic, social and environmental considerations.

It promotes the enhancement of biodiversity in green spaces and among developments in urban areas so that they are used by wildlife and valued by people

This document recommends that local authorities should seek appropriate measures to compensate for any harm to sites which cannot be prevented or mitigated. It also encourages the incorporation of beneficial biodiversity and geological features within the design of development

It directs that local authorities should only apply local designations to sites of substantive nature conservation value, and take care to avoid unnecessary constraints on development

7.2.3. THE LONDON PLAN

The London Plan directs boroughs to resist development that would have a significant adverse impact on the population or conservation status priority species.

It also commits the Mayor, alongside partner agencies, to taking a proactive approach to the protection, promotion and management of biodiversity and supports taking opportunities through careful design of developments, to enhance wildlife habitat.

Developments, where adverse impacts cannot be avoided, should ensure their impacts are minimised and / or mitigated.

7.2.4. CONNECTING WITH LONDON'S NATURE – MAYOR'S BIODIVERSITY STRATEGY

The main aim of this Strategy is to protect manage and enhance London's Biodiversity, including the blue ribbon network and within open spaces areas. It also seeks to improve wildlife habitats and water quality and access to green space and directs that progress in conserving biodiversity should be measured through indicators.

7.2.5. DRAFT BIODIVERSITY ACTION PLAN – A NATURAL RENAISSANCE FOR LEWISHAM

- This document is the foundation for individual Biodiversity Action Plans highlighting locally important plants and animals and their habitats,
- These Plans provide detailed information to supplement planning and development decisions, and allow for monitoring of progress.

7.2.6. UNITARY DEVELOPMENT PLAN (UDP)

Policy OS 13 states that the Council will have regard to the nature conservation value of all sites in the Borough that are proposed to be developed, and seek to protect and enhance these, either through the imposition of planning conditions or through ensuring alternative equivalent new habitat provision nearby. Development proposals for these sites should be accompanied by an environmental appraisal, including methods of mitigation and proposals for compensation.

OS12 does not permit any development within Sites of Nature Conservation Importance (as on proposals maps) if it is likely to adversely affect the protected environment.

Land use changes which would have an adverse impact upon protected plant and animal species will also not be allowed.

Policy OS10 encourages the use of tree protection orders in Open Spaces.

7.2.7. OPEN SPACE STRATEGY FOR LEWISHAM 2005-2010:

- The Strategy's main aim regarding this issue is to promote wildlife protection, biodiversity management and environmental education throughout Open Space areas
- It sets the target that the existing 3.5% of public space actively managed as natural habitat should increase to 4.5% by 04/05, to 5% by 05/06 and to 5.5 by 06/07.

7.3. OPTIONS FOR ADDRESSING THE ISSUE – CORE STRATEGY POLICIES

OPTION	NAME	DESCRIPTION
Core Strategy Option 4.1	To ensure the protection and enhancement and creation of natural habitats, particularly in areas of deficiency	This policy derives from the direction of the London Plan, PPS 9 and our Unitary Development Plan and Open Space Strategy. It comes from a more protectionist starting point rather than being permissive towards development.

7.4. OPTIONS FOR ADDRESSING THE ISSUE – DEVELOPMENT CONTROL

OPTION	NAME	DESCRIPTION
Option 4.2	Adopt target that the existing 3.5% of public space actively managed as natural habitat should increase to 4.5% by 04/05, to 5% by 05/06 and to 5.5 by 06/07	This policy is consistent with the direction of the Open Space Strategy for Lewisham 2005-2010.
Option 4.3	Subject to other planning considerations, developments seeking to conserve or enhance the biodiversity and geological conservation interests of the area and/or the immediate locality should be permitted	This policy is consistent with the direction of Draft PPS9. There should be some criteria to comply with so that developments merely 'seeking' to conserve or enhance biodiversity are genuine.
Option 4.4	Encourage naturalisation of waterways and esplanade areas in consultation with the Environment Agency	This is more of an advocacy role for the Council to encourage integration with other agencies to achieve common goals.
Option 4.5	Support for developments using green building methods	Methods such as green roofs, nest and roost sites, climbing plants on walls, landscaping have proven successful in encouraging urban biodiversity. Support for such techniques could give developers guidance into desired outcomes.
Option 4.6	Where development will result in adverse impacts on biodiversity and conservation, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.	A policy approach such as this is directly derived from Draft PPS9. It also conforms with the London Plan by allowing development providing appropriate mitigation or compensation is proposed.

Option 4.7	Council will need to be satisfied that any reasonable alternative sites for development have been fully considered	This option comes from PPS9. It could apply to the location of development within a specific site (e.g. proximity to adjoining conservation area), or the development site itself to ensure appropriate location.
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8. ISSUE 5: PROTECTION AND ENHANCEMENT OF OPEN SPACE LINKS AND CORRIDORS

8.1. WHAT IS THE ISSUE?

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

Activities on land adjoining these areas can potentially dilute the environmental qualities and effectiveness of links and corridors. It is therefore important that such activities are managed in such a way that avoids, remedies or mitigates these effects.

Links and corridors can also provide unique and valuable recreational opportunities for the community and public as a whole, while providing participants an opportunity to experience a more natural environment over a decent length journey. An example of this in the London Borough of Lewisham is the high-use South East London Green Chain, most of which is protected as MOL.

Lewisham's rivers (a short section of the Thames, and longer stretches of the Ravensbourne and its tributaries the Pool, Quaggy and Spring Brook) provide important linear features which can form the basis for wildlife corridors, as well as the Waterlink Way (see Policy OS 4) and the Thames Path (see Policy URB 25), and are important to sustain biodiversity. The Council considers that buffer zones around watercourses can help to maintain the character of rivers and provide refuges for wildlife, as well as pleasant and practical recreational routes.

8.2. WHAT DO OTHER PLANS AND PROGRAMMES SAY ABOUT THE ISSUE?

8.2.1. THE LONDON PLAN

One of the key objectives of the London Plan is to enhance routes for walking and cycling.

Policy 2D.10 encourages 'functional and physical linkages within the network of open spaces' and to improve accessibility for the wider public realm. It also encourages the creation of new links based on local and strategic need.

The London Plan commits the Mayor, alongside partner agencies, to taking a proactive approach to the protection, promotion and management of biodiversity and supports taking opportunities through careful design of developments, to enhance wildlife habitat.

8.2.2. DRAFT PPS9 BIODIVERSITY AND GEOLOGICAL CONSERVATION

PPS9 directs that Plan policies on the form and location of development should take a strategic approach to the conservation and enhancement of biodiversity in recognising the contributions that individual sites and areas make to conserving these resources within the wider environment.

It acknowledges that Statutory and non-statutory sites, together with countryside features which provide wildlife corridors, links or stepping stones from one habitat to another, all help to form a network necessary to ensure the maintenance of the current range and diversity of our flora, fauna, geological and land-form features and the survival of important species. In some areas the maintenance of traditional agricultural practices is important for nature conservation objectives

8.2.3. UNITARY DEVELOPMENT PLAN (UDP)

Policy OS 3 seeks to promote and manage Green Chains in order to enhance their role as a local and regional outdoor recreational resource.

The UDP commits the Council to safeguard the proposed route of the Waterlink Way as shown on the UDP Proposals Maps.

Through agreements with developers of sites within and adjoining the route some or all of the following elements, as appropriate, will be achieved:

- (a) to provide additional open space;
- (b) to improve the quality of the open spaces in Waterlink Way and the links between them, notably footpaths and cycleways;
- (c) to improve the course and appearance of the waterways and public access to them
- (d) to create wildlife habitats and to enhance the existing nature conservation value of the waterways.

Planning permission will only be granted for developments within Green Corridors that enhance these roles.

8.3. OPTIONS FOR ADDRESSING THE ISSUE – CORE STRATEGY POLICIES

OPTION	NAME	DESCRIPTION
Core Strategy Option 5.1	To secure the protection of ecological and recreational links and corridors	This core strategy conforms with the direction of the London Plan, PPS9 and the Unitary Development Plan. It stems from an overarching protectionist starting point rather than opening up link areas to potential development.

8.4. OPTIONS FOR ADDRESSING THE ISSUE – DEVELOPMENT CONTROL

OPTION	NAME	DESCRIPTION
Option 5.2	Where development will result in adverse impacts on links identified in the UDP maps, planning permission for it should only be granted where adequate mitigation measures are put in place. Council will seek appropriate measures to compensate for any harm which cannot be prevented or mitigated.	A policy approach such as this comes from policies contained in PPS9 and the Unitary Development Plan. It also conforms to the London Plan by allowing development providing appropriate mitigation or compensation is proposed. Such a policy would enable Council to require development contributions.
Option 5.3	Council will only permit development in areas identified in the planning proposal maps as 'Waterlink Way' or Green Chain if it enhances the biodiversity or recreational use of the links	This policy stems from an overarching protection and enhancement starting point rather than opening up link areas to potential development. It goes further in it's aim for enhancement that the London Plan requires and only allows 'positive' development (that which would enhance the natural values of linkages). This approach is consistent with the UDP's policy on Green Corridors.
Option 5.4	Council will encourage proposals for naturalisation of waterways in conjunction with the Environment Agency	This option is derived from the Open Space Strategy for Lewisham 2005-2010. It would place a responsibility on the Council to work with the Environment Agency and advocate for waterways enhancement where appropriate.

9. CONCLUSION

Open Spaces contribute greatly to our appreciation of the area in which we live, work and play. As well as being a source of recreation and amenity, they contribute to human and environmental health. Their protection can therefore not be underestimated.

We have identified five broad policy issues associated with open space in the London Borough of Lewisham. These are; open space provision and deficiencies, protection and enhancement of open space, quality and maintenance, nature conservation and biodiversity protection and providing for open space links and corridors. This list is by no means exhaustive and we would appreciate your input in identifying any other issues that may not fit into these categories.

The Council is seeking your comments and/or views on the issues and options set out in this paper in order to ensure that all feasible options are considered as part of the appraisal process and in developing the Core Strategy and Development Policies and Site Allocations Plans.

In preparing this and other Issues and Options papers, the Council is looking to the community and stakeholders to tell us the following:-

- What you think of the options presented
- What improvements could be made to the options
- Which are the options you would prefer the Council to take forward
- Are there any options we haven't put forward that you would like us to consider?

In thinking about the options presented, it must be remembered that the preferred option may not be a single discreet option that has been presented in this paper. It may be better to choose a combination of a range of options taking the best parts of each. The Council welcomes any general comments but would particularly value your views on the options presented. A consultation form is available for your completion.

PLEASE FORWARD ANY COMMENTS **BY 24th OCTOBER 2005** TO:

PLANNING POLICY
LONDON BOROUGH OF LEWISHAM
5TH FLOOR LAURENCE HOUSE
1 CATFORD ROAD
LONDON
SE6 4RU

OR E-MAIL TO planning@lewisham.gov.uk
Subject Line: Open Space & Biodiversity Issues Paper – Planning Policy



FEEDBACK CONSULTATION SHEET

OPEN SPACE Issues and Options

YOUR DETAILS:

NAME: _____

ORGANISATION (if applicable) _____

ADDRESS: _____

PHONE: _____

EMAIL: _____

WHY DO WE NEED YOUR COMMENTS?

The Council is seeking your comments and/or views on the issues and options set out in this discussion paper in order to ensure that all feasible options are considered as part of the appraisal process and in developing our new Planning Policy Documents (The Core Spatial Strategy and the Development Policies & Site Allocations Documents).

In preparing this and other Issues & Options Papers, the Council is looking to the community and stakeholders to tell us the following: -

- What you think of the options presented;
- What improvements could be made to the options;
- What option(s) are your preferred options that you want the Council to take forward;
- Any options we haven't considered that you would like us to consider before identifying a preferred option(s).

Please make your comments by the 24th **OCTOBER 2005** and send to:

Planning Services
London Borough of Lewisham
5th Floor Laurence House
1 Catford Rd, Catford
LONDON SE6 4SW

or email planning@lewisham.gov.uk

(1) ISSUE 1: OPEN SPACE PROVISION – DEALING WITH DEFICIENCIES

Q1: Do you agree with the Core Strategy approach in 1.1?
Yes No

Q2: Which target for open space provision do you prefer?

(1.1) 1.7/1000 average with aim to increase

(1.2) maintain existing

(1.3) only over areas of deficiency

Other suggestions?

(2) ISSUE 2: PROTECTION & ENHANCEMENT OF OPEN SPACE & AVOIDING INAPPROPRIATE DEVELOPMENT

Q3: Which Core Strategy Option is most appropriate for Lewisham?

2.1: Protect and take opportunities to enhance

2.2: Protect and seek new opportunities to enhance

Q4: Which of the proposed options do you think are best to protect and enhance open space?

2.1: Refuse planning permission in OS (if bad effects on OS)

2.2: Refuse planning permission nearby OS (if bad effects on OS)

2.3: Refuse planning permission nearby MOL (if bad effects on MOL)

2.4: Criteria based approach for UGS

2.5: Require new development to set aside 1.7ha/1000 population

2.6: Development contributions

2.7: Negotiate to open up private land to public

2.8: Assess potential brownfield sites

Other suggestions?
