

Public Examination of Lewisham Core Strategy Development Plan Document

London Borough of Lewisham Statement on Matter 5 Climate change issues and flood risk

Question: Whether climate change issues and flood risk are adequately addressed, and the implications for implementing the spatial strategy

Introduction

5.1 The Council considers that the Core Strategy (**CSD1.1**) adequately addresses climate change and flood risk issues. The objectives, strategy and policies identified correspond with national, regional and local policy and can be implemented. The Core Strategy seeks to address the impacts of climate change and contribute to the Government target to reduce CO₂ emissions by 60% from 2000 levels by 2050 and the Mayor of London's target to reduce regional emissions by 60% from 1990 levels by 2025. The strategy and policies will ensure implementation of the lean, clean, green energy hierarchy. Lewisham's Sustainable Community Strategy (SCS) (**CSD3.1**) has set a goal to contribute to sustainable development by tackling climate change through waste and energy reduction, support for low and zero carbon technologies, addressing flood risk issues and improving air quality. One of the six key outcomes of the SCS is for a clean, green and liveable Lewisham. The Core Strategy reflects this goal as a shared priority.

Core Strategy's overall approach to climate change

5.2 The Core Strategy (**CSD1.1**, Section 2, paragraphs 2.32 to 2.47) shows that for Lewisham, the largest contribution to CO₂ emissions is from the domestic sector. Paragraph 2.59 identifies the opportunity to ensure the impacts of climate change are addressed by preparing the borough for a post carbon economy. Accordingly, a key driver for change within the Core Strategy (**CSD1.1**, Section 3) is to create a more sustainable borough. This is carried forward into the Core Strategy vision for Lewisham to 2026 (**CSD 1.1**, Section 4) and the Core Strategy Objectives below (**CSD1.1**, Section 5):

- Objective 5: Climate change
- Objective 6: Flood risk reduction and water management
- Objective 7: Open spaces and environmental assets
- Objective 8 Waste management and
- Objective 9: Transport and accessibility.

5.3 Spatial Policy 1 (**CSD1.1**, Section 6) seeks to ensure all new development contributes positively to the delivery of the vision for Lewisham and the Core Strategy objectives. Spatial Policy 2 (**CSD1.1**, Section 6) focuses on major regeneration and development opportunities in identified Regeneration and Growth Areas, in particular, capitalising on accessibility to public transport, the availability of previously developed land and opportunities to intensify land uses in town centres and mixed use employment locations. Spatial Policy 3 and Spatial Policy 4 (**CSD1.1**, Section 6) identify four

District Hubs and three Local Hubs respectively. These hubs primarily centred on town centres and local parades, seek to reduce the need to travel thereby contributing to a sustainable borough. Spatial Policy 5 (**CSD1.1**, Section 6) also seeks to ensure the retention and protection of shopping areas that contribute to local daily needs and therefore reduce the need to travel.

- 5.4 Core Strategy Policy 7 (**CSD1.1**, p.91) seeks to ensure Lewisham makes an adequate contribution to climate change by implementing the principles of 'avoidance, mitigation and adaptation' to reduce Lewisham's CO₂ emission through a partnership approach.
- 5.5 Core Strategy Policy 8 (**CSD1.1**, p.91) aims to reduce Lewisham's CO₂ emission and the environmental impacts of all new developments by improving energy standards and other sustainability aspects, including compliance with the Code for Sustainable Homes and BREEAM standards.

Council recommended amendments and implications for implementation

- 5.6 The Council has engaged with developers, landowners and other stakeholders to identify opportunities for achieving sustainable development throughout the plan preparation process. Alterations are recommended for Core Strategy Policies 7 and 8 (CSP7, CS8) (**CSD1.5**) in response to the representations received against the proposed submission version of the Core Strategy. The amendments were submitted to the Secretary of State with the Core Strategy and released for public comment between 29th October to 3rd December 2010 (extended until 7th January 2011). The Council did not receive any representations against amended policies (CSP7 and CSP8).
- 5.7 CSP7 has been amended to include a section previously in CSP8. This now refers to the application of relevant London Plan policies and provides the overarching Core Strategy policy.
- 5.8 Representations (**CSD1.9**) to CSP8 of the Core Strategy Proposed Submission Version (**CSD2.27**) from developers raised concerns on the feasibility and viability of the policy for tackling climate change through the Code for Sustainable Homes (CSH). The Greater London Authority (GLA) also noted that the stepped approach to applying the CSH as noted in Part 3 of CSP8 was very ambitious and went beyond the draft replacement London Plan proposals (**CSD4.2**). The Council was advised to reconsider the targets in light of the proposed targets in the draft replacement London Plan.
- 5.9 It is understandable that the challenging economic conditions in the last two years indicate that adopting a definite step change approach to the application of the CSH ahead of the national requirement in all new residential development would be challenging to deliver and implement. The Council has therefore proposed an amendment to CSP8 (**CSD1.5**) so all new proposed residential development would meet the minimum level of CSH Level 4 (that is 44% above Part L (2006) and 25% above Part L (2010) of the Building Code). This will maintain the focus on addressing

and mitigating the issues identified while providing flexibility to developers on a site-by-site basis to ensure compliance in a way that is both feasible and viable.

- 5.10 The Lewisham Renewables Evidence Base Study (**CSD3.22**, Section 6) has undertaken viability testing on the costs of implementing CSH Level 3 and 4, based on different development typologies in the borough. It demonstrates that there are a range of renewable options available to developers to enable them to meet CSH Level 4, and supports our desire to allow developers flexibility on a site-by-site basis to deliver on our CO₂ reduction targets.
- 5.11 The latest *Code For Sustainable Homes: A Cost Review* (2010) by the Department of Communities and Local Government (**CSD5.32**) also recognised higher environmental standards will cost more in design and construction initially, but it is foreseeable that the construction cost premium will drop over time as zero-carbon technology becomes more cost effective, standardised and easier to incorporate into design and construction processes, with financial paybacks for implementing sustainability measures.
- 5.12 The amendment to CSP8 (**CSD1.5**) ensures the policy emphasises the importance of the overall reduction of carbon dioxide emissions of development. This is in line with national policy and the draft replacement London Plan. Specifically, Part 2 of CSP8 has been amended and details are provided below.
- 2(a) This remains unchanged in that part 2(a) and 2(b) from the Submission Version (**CSD1.1**) have been combined. The submission of a Sustainability Statement and Energy Statement is in accordance with the London Plan and its draft replacement. As the London Plan is already part of the Development Plan these requirements are already in place.
- 2(b) The need to maximise energy and water efficiency is a requirement in the London Plan. No standard is specified in this part of the policy and the Council will expect evidence in the Sustainability and Energy Statements to show how this has been achieved. If viability becomes an issue for implementation of a scheme, evidence will be required and assessed as part of the planning application.
- 2(c) This is a clarification of CSP8 2(c) of the Submission Version (**CSD1.1**). The evidence base (**CSD3.22**) and a document titled *Powering Ahead: Delivering low carbon energy for London* (**CSD4.37a**) shows the South East London Combined Heat and Power Plant (SELCHP) in Deptford/New Cross provides enough power to operate 48,000 homes and was designed as a district heating plant but has never been used for this purpose. There is a requirement to provide a pipe network to connect development to SELCHP. The evidence shows that the quantum of development proposed in the borough, particularly residential numbers, is sufficient for this to become economically viable. The Council is working with SELCHP and developers to facilitate the provision of the pipe network.

- 2(d) The emphasis is on a holistic approach to on-site renewable energy generation rather than requiring a 20% target. This is in line with the draft replacement London Plan, reflects best practice.
- 2(e) This emphasises CO₂ reduction in order to achieve national and regional targets. Where this cannot be met satisfactorily, the Core Strategy (**CSD1.16**, paragraph 7.57) specifies an exception where a financial contribution is sought to contribute to reduce emissions from existing stock. The Carbon Offset Fund seeks to compensate and mitigate the drawbacks brought by new development in the borough, where it is evidenced that the delivery of CO₂ reductions set out in CSP8 cannot be achieved on-site. This will bridge any gap between CO₂ emissions delivered on-site and the target to ensure the borough is still able to mitigate climate change issues. Evidence of financial viability will be used as part of the decision making process for implementing the policy, sites and strategies of the Core Strategy and details of the Fund are available in the Planning Obligations Supplementary Planning Document (DRAFT) (**CSD3.49**), ensuring developers are aware of the provisions.

Flood risk

- 5.13 A Strategic Flood Risk Assessment (SFRA) was published by the Council in July 2008 and signed off by the Environment Agency (EA) (**CSD3.18**). This was followed by a Sequential Test (ST) in July 2009, produced in consultation with the EA (**CSD3.19**).
- 5.14 The Council has taken the SFRA and the ST into account in preparing the Core Strategy's policies and strategic site allocations, and the accompanying Sustainability Appraisal.
- 5.15 The EA has submitted supporting representations on the flood risk related policies of the Core Strategy Proposed Submission Version (**CSD2.27, CSD1.9**). The said policies (Core Strategy Policies 10 and 11) have been carried forward to the submitted Core Strategy (**CSD1.1**) with the Council proposing a minor amendment as shown in the Schedule of Recommended Amendments October 2010 (**CSD1.5**, pp 36; no 87).
- 5.16 In accordance with the SFRA and PPS25 (**CSD5.11**), the Core Strategy sets out policies for the location of development that avoid flood risk where possible and manage any residual risk, taking account of the impact of climate change. It takes these matters into account in the drivers for change (**CSD1.1** Section 2, pp3, paragraph 3.8), the strategic objectives (**CSD1.1** Section 5, Objective 6) and sustainable development principles, on which the subsequent spatial strategy policies (**CSD1.1** section 6) are based.
- 5.17 The spatial strategy and cross cutting and thematic policies of the Core Strategy are based in part on evidence of development land capacity set out in the Strategic Housing Land Availability Assessment (SHLAA) (**CSD4.32a**) and Employment Land Study (ELS) (**CSD3.6**). These studies have taken account of the 2008 SFRA flood

risk information in the assessment of sites while the Core Strategy has also taken account of the Sequential Test.

- 5.18 Information on the borough's housing need and residential land capacity/housing trajectory indicates a net additional provision of 18,165 new dwellings by 2026. The five strategic sites within the Core Strategy are expected to deliver 9,450 or approximately 52% with the remaining 8,715 dwellings being delivered on other sites.
- 5.19 As indicated in the SFRA (**CSD3.18**) a significant proportion of the borough's proposed development sites fall wholly or partly within Flood Zone 3. The five strategic sites allocated in the Core Strategy (**CSD.1**, Section 8) are located within Flood Zone 3, save for 10% of the London Gateway site. However Section 7 of the SFRA and the Sequential Test (**CSD3.19**) indicate that due to the lack of available sites in Flood Zones 1 and 2 development is acceptable on these sites, subject to sustainable management of flood risk. This approach was endorsed by the EA.
- 5.20 As such, Core Strategic Policy 10 Managing and reducing the risk of flooding (CSP10) and Core Strategic Policy 11 River and waterways network (CSP11) contain criteria to protect land required for flood management, and require new development to demonstrate measures to manage flood risk. CSP10 also seeks to ensure that applications for development are considered in relation to the SFRA and the Sequential Test, which set out relevant advice on the sustainable management of flood risk and a requirement for a site specific flood risk assessment.
- 5.21 CSP10 requires all new development is to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground (SUDS) unless site or environmental conditions render these measures unsuitable. Consideration must be given to the London Plan SPG on Sustainable Construction and Design.
- 5.22 The EA and the SFRA indicate the greatest threat to Lewisham is fluvial flooding from the River Ravensbourne (as the Thames is defended by the Thames Barrier) and surface water drainage flooding. The EA, in partnership with the Council, have produced the Ravensbourne River Corridor Improvement Plan (**CSD3.11**) providing design guidance for distinctive areas along the river which are proposed or likely to be developed, as well as general guidance that applies to all the borough's rivers that include the Quaggy and the Pool.
- 5.23 Following the Flood Risk Regulations 2009 and as required under the Flood and Water Management Act, April 2010, the Drain London Forum (GLA) is currently undertaking a Department for Environment Food and Rural Affairs (Defra) funded pan-London surface water management plan. Borough-level completed Surface Water Management Plans are scheduled to be delivered in April 2011. A review of the SFRA will then follow.
- 5.24 The EA flood zones will not be shown on any approved proposals map as the EA revises flood zone maps four times a year, hence the maps can become dated over a short period of time. The latest zones will be used when the SFRA is updated and

made publicly available using the councils web based GIS system. Account is taken of updated EA flood zone maps in assessing sites in relation to the allocation of land in the Development Plan and for relevant planning applications.

Conclusion

- 5.25 The Core Strategy is considered to provide adequate, appropriate and viable measures to tackle climate change and flood risk in Lewisham. It is in conformity with national and regional policy, supported by robust evidence base documents, and set through a balanced approach between economic viability, social acceptability and environmental impact in different development scenarios and locations.