

Date: 10 February 2012  
Our ref: 42709  
Your ref:



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Dear Mr Jericho,

**Habitats Regulations Assessment (HRA) of Lewisham Site Allocations and Lewisham Town Centre Area Action Plan DPD at pre-submission stage**

Thank you for your letter and enclosures dated 9 January 2012, requesting Natural England's views and comments on the above consultation document. Your letter has been passed to me as a member of the Land Use Service Team for response.

**Lewisham Town Centre Area Action Plan**

Chapter 1: The Plan and Context

Under paragraph 1.3 – Summary of issues and challenges, there is reference to the provision of open space and recreational facilities, linked to social infrastructure which is welcomed. The Environment section covers biodiversity and habitats, and refers to protection and enhancement of sites and habitats, the Council should also seek creation of new sites and habitats and sites, where appropriate. Reference to the Blue Ribbon, in this instance the Rivers Quaggy and Ravensbourne are welcomed and to be encouraged.

Chapter 2: Vision and Objectives

Section 2.2 Objectives, lists the nine objectives of the Area Action Plan, which can be broadly supported, especially Objective 5 – Open space/recreation – creation of new recreation and open space is to be welcomed and encouraged, the links to the Health benefits of open spaces is also welcomed.

Objective 7 in respect of the creation of enhanced and new open/green spaces, helping to alleviate heat island effects can be linked to objective 5 above, helping to strengthen the document further.

Chapter 4: Town Centre Areas and Sites

Lewisham Gateway

Enhancements of the Public Realm should consider the potential for 'soft' landscaping, where appropriate, linking into the Council's aspirations in regard to tree planting and Adaptation to Climate Change.

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### Loampit Vale

Key Route and public realm improvements could take the form of green chains/links – providing, improving access to parks/open spaces as well as promoting walking and cycling.

### Conington Road

Natural England welcomes and encourages the enhancement of the ecological quality of the River Ravensbourne and its potential as a public amenity resource – linking into the Blue Ribbon network, promoting walking and access to nature.

### Policy LAAP 5:

This policy is broadly supported;

- a) Improvements to pedestrian/cycling access could incorporate green infrastructure provision through the use of green chains/links;
- b) Enhancements to the ecological quality of the river environment is welcomed and to be encouraged;
- c) High quality urban space with generous functional and formal landscaped areas, this has the potential to include/encompass green infrastructure opportunities and is to be encouraged.

### Lee High Road

#### Policy LAAP 6:

Policy is broadly supported, especially;

- b) Enhancing the public realm, the Council need to consider the potential for green infrastructure, where appropriate.
- c) Protecting and enhancing the biodiversity along the river Quaggy, which is welcomed and to be encouraged.

### Ladywell

Environmental improvements are to be welcomed and encouraged.

### Central Town Centre

Natural England welcome and supports environmental improvements within the area and encourages the Council to give consideration of green infrastructure provision, where appropriate, soft landscaping can also link to Council objectives such as tree planting, walking/cycling opportunities and alleviating heat island effects.

## Chapter 5: Area Wide Policies

### Section 5.2 – Building a Sustainable Community

Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:

- No person should live more than 300 metres from their nearest area of natural green-space;
- There should be at least one accessible 20 hectare site within 2 kilometres;
- There should be one accessible 100 hectares site within 5 kilometres;
- There should be one accessible 500 hectares site within 10 kilometres.

This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.

Natural England welcomes the inclusion of public realm Policy LAAP 18 under this section, identifying links and access to, from and across facilities within the Area Action Plan area, which also links into the mitigation of heat island effects and can also provide health benefits and promote walking and cycling initiatives.

#### LAAP 21: Sustainable Transport

2) references to walking and cycling opportunities should investigate the potential for green infrastructure opportunities through green chains/links.

#### Section 5.3 Environmental Management

LAAP 25 Adapting to Climate Change is welcomed and Natural England encourages the measures identified here.

Natural England is supportive of the inclusion of living roofs in all development in principle: they can provide useful habitat for local wildlife and contribute to sustainable urban drainage. Natural England recommends the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent areas the following website offers a range of innovative solutions for consideration;

[www.livingroofs.org.uk](http://www.livingroofs.org.uk)

#### **Appendix 1: Policy, Guidance and Evidence Base Linkages**

The documents referenced are appropriate although there is no reference to Planning Policy Statement 9 – Biodiversity and Geological Conservation.

#### **Site Allocations Proposed Submission**

Natural England has no substantive comments to make in respect of this consultation document, and is content to be consulted on individual sites and applications as they are brought forward as appropriate.

#### **Lewisham Site Allocations and Lewisham Town Centre Area Action Plan – Habitats Regulation Assessment**

The approach and methodology are acceptable to Natural England, the boundary, sites identified and guidance used is in line with the advice that would be offered by Natural England.

#### Chapter 4: Conclusion

In respect of these documents, Lewisham Town Area Action Plan and Site Allocations Proposed Submission documents, Natural England can agree with the conclusion reached in this chapter that stages 2 and 3 requiring a full Habitats Regulation Assessment is not required.

I hope that this makes Natural England's position clear but if you have any further questions about this letter or require further information please do not hesitate to contact me.

Yours Sincerely,

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