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QWAG response to Lewisham's Core Strategy April 2010

"...the naturalisation of waterways is a priority for the Council" (para 7.82)

"...it is possible to put the river back at the heart of new development and our open spaces" (para 7.70)

"the Council's proactive approach to the protection, promotion and management of biodiversity" (para 7.84)

"ensure the...Ravensbourne River Network are preserved and enhanced"

"...use the opportunities from regeneration and other local initiatives to bring the River Ravensbourne back to the heart of Lewisham, as an attractive focal point for local communities" (para 7.71)

"Lewisham Gateway is sited on the confluence of the rivers Ravensbourne and Quaggy, which should be enhanced in development proposals" (para 7.134)

Introduction

The Quaggy Waterways Action Group (QWAG) brings urban rivers to life. We use our experience to lead or support and catalyse others to restore the Quaggy and other rivers to play their natural role in urban regeneration and quality of life for people and wildlife. This is what we call 'river-powered regeneration'.

QWAG is pleased to respond to Lewisham's draft Core Strategy, the blueprint for the borough development until 2026, which we regard as instrumental in ensuring both that waterways in the borough play their natural role in quality of life and urban regeneration for people and wildlife and that related community, economic and environmental matters are properly addressed.

Our comments and observations are indicated in **red text**.

We note that Lewisham Council will use the core strategy to decide and guide the shape, the look, the feel and the physical regeneration and spatial development of the whole borough:

“...the Core Strategy is about shaping the future of the borough as a better place to live, work, relax and visit, often referred to as place making. This means deciding what sort of a place we want the borough to be in 2026.” (Para 1.5)

The strategy has five main themes:

- **Regeneration and growth areas** (plans for town and other centres and for the re-development of large vacant sites)
- **Providing new homes** (to meet local need and for the borough to play its part in London wide and national housing policies)
- **Growing the local economy** (supporting local activity and positioning the borough to feed into activity in central London and docklands)
- **Environmental management** (action on climate change, reducing resource use and improving local amenity)
- **Building a sustainable community** (supporting the array of needs and facilities which are needed to help the borough and its communities function)

Locally distinctive policies

To ensure that the Core Strategy is relevant to the borough it should contain policies and strategies which are. Para 1.13 states that the Core Strategy aims to result in **“a locally distinctive approach for Lewisham”** at the same time as complying with London wide and national policies which the Council must follow.

QWAG comment:

For the core strategy to be locally distinctive it should adopt and advance policies which help identify the borough's distinctiveness from other locations such as Bromley, Croydon or Canary Wharf.

It is not apparent that the current version of the core strategy adequately and explicitly views the borough's rivers, their protection and restoration as key ways to ensure the existence of local distinctiveness. This major omission means that the strategy currently underplays the role of rivers and misses the opportunity to adopt truly distinctive policies. In summary although the current strategy contains policies and references to rivers these are not dealt with in ways which fully realise the opportunity to develop truly locally distinctive approaches promised in paragraph 1.13.

QWAG comment:

It is not clear how the strategy is 'sound' in being sufficiently flexible to deal with changing circumstances for example, the impacts of climate change and the ability of local biodiversity to recover from fragmentation, cope with direct and indirect development pressures and to play its role in climate adaptation and in meeting social needs.

The strategy is vague about how tensions between conflicting drivers will be managed for example, the strategy's desire for development and regeneration with the need to protect and extend green, bio-diverse space.

It is also important that the strategy explicitly sees rivers and river corridors as green space worth protecting (whether to build in resilience to climate change, increase green spaces, biodiversity and amenity) and as such a net gain to the borough. Clear statements concerning the value of rivers and how they are part of natural, green and open space, would be helpful in this respect.

QWAG comment:

Drivers of change

We recommend that better use of resources and the role of communities in decision making are missing as drivers of change.

Better use of resources - elsewhere in the core strategy (paragraph 9.55, for instance) the economic downturn is referred to a reason for the potential failure to maintain or deliver local habitats and open space. We define better use of resources as better joined up decision making to make use of scarce resources (e.g. financial) and to ensure that sustainable development is delivered in an integrated (social, economic and environmental)

The role of communities in decision making – it no longer adequate for developers and local council to act alone in deciding what an area requires and new forms of scrutiny and proof of long term benefit are required which go beyond the formal processes of policy and plan making and consultation.

The strategy will be improved by including up to date references to and inclusion of new drivers of change which related to changes in society which the plan making system should relate to. These relate to how to make better decisions through use of resources and the inclusion of communities in decision making which go beyond the limits of formal consultation exercises with which plan making and development control is familiar but which still tends to exclude many interests for various reasons.

A. Flood risk – pages 22-23

Para 2.45 - “The northern part of the borough is situated immediately adjacent to the River Thames for approximately one kilometre. Deptford Creek, the **River Ravensbourne and the River Quaggy are also key features of the borough.** At least one-fifth of all residential and non-residential properties in the borough are at some risk of flooding from these sources.

While the Thames poses a potential risk of flooding to properties within this area of river frontage, properties are currently protected from flooding by the River Thames Tidal Defences up to the 1 in 1,000 year event.”

Para 2.46 - “Properties within the vicinity of the **River Ravensbourne or the River Quaggy corridors are subject to a potential risk of fluvial (river) flooding. Investment has been made into flood defence to reduce the risk of flooding,** particularly within Lewisham Town Centre. However, fluvial flooding still remains a threat to property within the borough.”

Para 2.47 - “**A potential risk of flooding from other (non-river related) sources exists including possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies.** With changing climate patterns, it is expected that intense storms will become increasingly common and those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years.”

B. Parks and green space – page 23

Para 2.48 - “Lewisham has a varied portfolio of parks and other green spaces from those with strong historical links, such as Beckenham Place Park, Horniman Gardens and Blackheath, to those that have been created through community campaigning, such as the Sue Godfrey Local Nature Reserve.

Lewisham is one of the greenest parts of south-east London. Over a fifth of the borough is parkland or open space. These areas play an important environmental (biodiversity) and recreational role as well as defining and continuing to contribute to Lewisham's overall character. The council also has 21 nature conservation areas directly under ecological management, each with its own unique features.”

Para 2.49 - “While one of the greenest Inner London boroughs there are **areas of deficiency** particularly within the wards of Brockley, Catford South, Lee Green, Perry Vale and Telegraph Hill.

This is a result of the historical pattern of development, and connections to nearby parks and open space need to be improved.”

QWAG comment:

The strategy deals with the borough's rivers mainly as a source of flood risk (paragraphs 2.45-2.47) and not as a natural assets which are part of effective action on climate change, the restoration of depleted bio-diversity and the creation of rewarding places for people to enjoy and learn from.

Paragraphs 2.48 and 2.49 on green and open space do not explicitly refer to the role of rivers and their potential when properly protected, managed and restored as part of an approach to the borough's reduced open space and amenity of bio-diversity value.

Paragraph 2.48 and 2.49 should include explicit reference to the role of rivers, especially in restored, re-naturalised conditions, in the assessment of 'areas' for their role as 'important environmental (biodiversity) and recreation' assets and wider role in the borough's character.

C. Building a sustainable community

Para 3.9 - “The **benefits of new development need to be maximised** for all in the community and will be central to addressing and reducing issues related to deprivation in order to improve education, employment and training opportunities, and reduce health inequalities. **New development can contribute to both the provision and enhancement of existing services and facilities**, where demand for them arises from the new populations. There is also a role to play in **creating a sense of place and community** through the high quality design of buildings and spaces that are safe and contribute to a healthy environment.”

QWAG comment:

The strategy is vague about how benefits of new development should be realised to ensure that plans explicitly include environmental and amenity gains as benefits of new development. More certainty is required about the planning and delivery of well managed bio-diverse natural assets as part of new development.

This is particularly necessary given the statement in paragraph 9.55 that, “The Council could at various times experience financial constraints that could lead to a redirection of budgets away from the maintenance of open space. In the context of an economic downturn, new developments which could have been expected to provide new open space or improvements might not proceed. The Council will support development through the actions stated in previous sections”.

The strategy should set out with more certainty how development will contribute to restoration of depleted bio-diversity and environmental amenity.

D. The Core Strategy's “vision” for Lewisham in the year 2026

Para 4.7 “**In 2026 the regeneration and physical transformation of the London Borough of Lewisham will meet the needs and aspirations of existing and new residents and visitors by creating a sustainable, vibrant, exciting suburb on the edge of inner London one which supports safe, attractive and diverse communities where local people are at the heart of the regeneration process. It will be a place of choice for people to live, work and relax, having played a key part of the success in the Thames Gateway and of London as a world city.**”

Para 4.8 “**New development throughout the borough will meet the challenges of climate change, flood risk, the need for renewable energy, and the use of sustainable materials and construction practices.** Accessibility and inclusiveness, and design to reduce crime and the fear of crime will be at the heart of the design of new developments. The **provision of new green space will be emphasised both in terms of local recreation** and children's play space, and new initiatives for urban food growing and the provision of allotments. **Biodiversity in new developments will have**

been enhanced wherever possible including the use of living roofs and walls. The borough will be greener by a programme of street tree planting.”

QWAG comment:

The sustainability appraisal indicates that the emphasis on housing growth will affect green space. Notably, on page 72 of the sustainability appraisal, the appraisers state that it is likely that “Increased development will reduce the per capita amount of open space, and has the potential for habitat loss impacting negatively on biodiversity (SA Objectives 5, 6)” and that “Biodiversity levels may suffer due to population growth and development pressures (SA Objective 6).”

The reference to living roofs and walls is a welcome recognition of these new initiatives in development. However, it is unsafe for the core strategy to rely on these to make good deficiencies which exist and may be exacerbated by aspects of the strategy.

Living roofs and walls may be designed and used to aid learning and they are useful in creating certain types of new bio-diversity habitats and addressing urban heat island effects. But they are unlikely to create new accessible spaces for human recreation and physical exercise and if they were their biodiversity benefits are likely to be limited. Moreover they are not a replacement for thorough approaches to restoring, recreating and maintaining other forms of bio-diverse open space, and the strategy should not rely on them to do so as is currently implied.

Para 4.9 “**Key regeneration and development opportunities will have been focused on the localities of Lewisham, Catford, Deptford and New Cross due to the availability of sites and the desire to address deprivation** issues in order to improve education standards, general health and well-being, and local employment and training, **through improvements to the physical and economic environment.**”

Para 4.10 “**Lewisham Town Centre will have been transformed into a shopping and leisure destination of exceptional quality, offering a strong focus for community identity and cohesion. The centre will benefit from the Lewisham Gateway site** delivering easier and better pedestrian routes between the bus and train stations and the high street, a new road layout and new commercial, retail and residential development. New high quality residential developments will help to increase the number and diversity of people using the centre and support its Metropolitan Town Centre status. The street market will continue to provide an extensive range of goods and its overall contribution to the quality of the urban environment will be improved. **The Quaggy and Ravensbourne Rivers will be celebrated by the provision of a network of public green spaces and parks including Cornmill Gardens. A new landscaped public plaza where these two rivers meet will consolidate the identity of Lewisham as a river valley town and provide an enhanced sense of place and focus.**”

QWAG comment:

The proposed development of central Lewisham at the confluence of the rivers is not inadequate to support the natural restoration of the local rivers for a variety of reasons including the lack of sufficient space in the redevelopment to create the river corridor necessary.

The opportunity now exists for the redevelopment of Lewisham town centre to be re-evaluated to create the necessary space which would restore the rivers as needed to create locally distinctive development in full.

Para 4.11 “Deptford and New Cross will become a sustainable location with a high quality environment...”

Para 4.13 “**The north of the borough will have been transformed by the regeneration of large strategic sites** that will provide new places for people to enjoy, and new facilities to support existing and new communities. New development will provide a mix of jobs, training opportunities and high quality homes including housing for families to meet local need, and will have helped to improve residents quality of life, health and well-being. The physical environment for businesses, and availability of suitable premises will have improved. The local economy will be more diverse and will

cater for new and growing sectors including green industries, and service businesses that take advantage of the area's close proximity to central London, and will cater for traditional industrial activities and sites accommodating necessary infrastructure essential to the functioning of London. Millwall Stadium will become an attractive and inclusive leisure destination for all the community. Convoys Wharf will see the re-opening of wharf uses to provide a sustainable facility for the river transport of cargo in association with a new mixed use development providing local jobs and new homes."

Para 4.14 "**Catford Town Centre, home of the council's services and the civic heart of the borough, will be a lively, attractive town centre focused around a high quality network of public spaces.** Driven by the redevelopment of key opportunity areas, including the redevelopment of the former Catford Greyhound Stadium site and the Shopping Centre, Catford will have an improved retail offer and will be home to a diverse residential community. The Broadway Theatre and Studio will continue to be a focus for arts and cultural activities and the market will continue to contribute to Catford's identity."

Para 4.15 "**Outside the key areas of physical regeneration, the pleasant character of the many high quality residential neighbourhoods will have been retained by development that is sensitive to context and appropriate in size and scale to its location.** The borough will have enhanced its unique assets including the preservation of historic sites and conservation areas; the protection and improvement of parks, gardens and open space networks such as the Waterlink Way, South East London Green Chain and the East London Green Grid; improved public transport links; and a network of vibrant major streets connecting and supporting places within and beyond the borough."

Para 4.16 "Vibrant hubs of local activity, centred on the district and local centres of Blackheath, Downham, Forest Hill, Lee Green, Sydenham, Hither Green and Brockley Cross, will anchor residential areas, deliver essential shops and services needed for daily life and provide enjoyable places for people to meet and use, and will be supported by locally significant business areas. These centres will also be supported by a network of viable local shopping centres and parades such as Crofton Park, Lewisham Way and Grove Park that will provide accessible services and facilities reducing the need to travel."

Para 4.17 "People living in the Bellingham, Whitefoot and Downham wards will have benefited from the various social and economic programmes addressing and improving health, education, and local employment and training."

Para 4.18 "Communities across the borough will rely on effective local and excellent facilities to support their day to day life, including the following services: health, education, community, arts, cultural, entertainment, leisure, sports and recreation. All secondary and primary schools will have been rebuilt or refurbished, contributing to improved educational standards. The completion of the East London Line extension (the London Overground) and the Thameslink programme will ensure better connections for the borough to London and beyond."

Para 4.19 "Lewisham will **draw on the resources of all in the community and work together with its partners to deliver the vision** to ensure that by 2026 it has capitalised on its many opportunities over the past 15 years."

QWAG comment:

Para 4.15:

Suggested revised wording:

"Outside the key areas of physical regeneration, the pleasant character of the many high quality residential neighbourhoods will have been retained by development that is sensitive to context and appropriate in size and scale to its location. The borough will have enhanced its unique assets including the preservation of historic sites and conservation areas; the protection and improvement of parks, gardens and open space and river networks such as the Waterlink Way, South East London Green Chain and the East London Green Grid; improved public transport links; and a network of vibrant major streets connecting and supporting places within and beyond the borough."

The change being the insertion of '...and river' after 'gardens and open space' and before 'networks such as the Waterlink Way...'

Sustainability Appraisal – key issues summarised below:

Overall outcomes of the SA

In a built up urban area like Lewisham land will always be a scarce resource, especially due to the increasing demand for homes, employment opportunities and other supporting community and infrastructure facilities needed to support the existing and future population growth. It is important to seek a balance to promote a range of land uses to create sustainable and balanced communities.

Overall the findings of the SA process indicates that the implementation of the Core Strategy will lead to higher levels of sustainability in Lewisham through improved economic, environmental and social outcomes over the duration of the plan period. The appraisal has shown that **the Core Strategy would provide a wide context for regeneration and would particularly benefit the most deprived wards** located in the north of the borough (Evelyn and New Cross). The **redevelopment opportunities of larger sites could radically improve the physical and socio-economic environment.**

QWAG comment: What about the natural environment?

The relatively small economy of Lewisham indicates the **necessity to protect employment sites and provide for employment growth sectors in order to retain and grow a workforce within the borough.**

Issues related to **flooding, climate change, waste generation and the efficient use of natural resources are very much dependent upon how development takes account of such factors** at the design, construction and operation stages. **Implementation will need to be monitored to ensure effective delivery.**

QWAG comment: The SA is not at all certain that development will be beneficial without rigorous action by all concerned including enforcement bodies.

Development within the **Regeneration and Growth Areas is likely to increase road traffic and add pressure to the public transport system, which will increase traffic related air pollution and noise, impacting health.** Cumulative impacts of development on air quality and traffic flow will need to be addressed with planning proposals.

QWAG comment: Impacts of air quality, noise and traffic volumes on amenity and biodiversity seems to being passed of a necessary, acceptable and entirely manageable, which is not safe.

It is expected that new development will be constructed to the highest standards of sustainable design and construction as proposed by the Core Strategy. There are opportunities available to provide on-site renewable energy, decentralised energy systems, promote the Code of Sustainable Homes and BREEAM 'very good' to 'excellent' standards in **LDF Sustainability Appraisal – Core Strategy Proposed Submission Version 5** new buildings, and ensure the efficient use of energy and other natural resources. This approach will help reduce the dependency on conventional fuel types for electricity and heating needs and will contribute towards achieving regional and national CO2 reductions targets, hence mitigating climate change.

In all circumstances, the **risk of flooding must be considered as a priority** and any necessary mitigation and adaptation measures taken into account. The Council has produced a **Strategic Flood Risk Assessment (SFRA) and Sequential Test**, which has informed the preparation of the Core Strategy and will assist when considering planning applications. **It is anticipated that the amount of public open space per 1,000 population will be reduced as a result of higher density housing and the increase in population. The suggested policy approach for open space focuses on improving the quality of existing spaces rather than just seeking an unrealistic increase;** and improving the accessibility of open spaces and connectivity to and between open spaces. It will still be **necessary to protect any existing open space and make provision for additional open space where feasible**, particularly in areas identified as deficient in provision.

QWAG comment: why is extra provision unrealistic as stated / claimed? There is plenty of scope to incorporate natural conservations in new areas. (also see SA page 45)

The **increased development may lead to habitat loss, particularly on sites that are derelict and vacant.** The demand for development, and in particular housing is unlikely to prioritise these habitats. However, mitigation measures include introducing 'living roofs and walls' in new development and requiring on-site green open space in large scale development proposals. Some temporary impacts have been identified on the natural environment during the construction phase particularly for air quality, noise, and vibration, which could be mitigated by introducing site specific measures.

Core Strategy Objectives

Below are the objectives for two of the five themes most related to QWAG's aims: *Environmental management* and *Building a sustainable community*.

Core Strategy Objective 5: Climate change

5.8 The Council with its partners will take action to ensure that climate change is adapted to and mitigated against, including those measures necessary to create a low-carbon borough and reduce carbon emissions by:

- a. promoting resource and water efficiency
- b. maximising generation and use of renewable energy and locally distributed energy, particularly for major development sites
- c. building to high standards of sustainable design and construction
- d. reducing waste generation
- e. supporting environmental protection and enhancement including establishing ecological networks**
- f. minimising the environmental impacts of development including water, noise and air pollution.**

Core Strategy Objective 6: *Flood risk reduction and water management*

5.9 The Council with its partners will take action 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 by:**

- a. using the Environment Agency's sequential and exception tests to allocate land for development
- b. requiring river restoration and appropriate flood defences as part of development proposals, where appropriate**
- c. ensuring appropriate local flood defences are maintained and provided for and
- d. requiring sustainable urban drainage systems in new development, wherever feasible.

Core Strategy Objective 7: *Open spaces and environmental assets*

5.10 The important environmental, ecological and biodiversity features of Lewisham will be protected and capitalised to promote health and well-being by:

- a. protecting all public open space including Metropolitan Open Land**
- b. protecting Sites of Nature Conservation Importance and supporting and promoting local biodiversity**
- c. requiring green roofs and walls where appropriate
- d. implementing the Street Tree Programme
- e. improving the quality of, and safeguarding access to, all public open space**
- f. providing accessible and varied opportunities for health, leisure and recreational activities including the South East London Green Chain Walk, the Green Grid, the Waterlink Way and the Thames path.**

QWAG comment:

This policy currently misses the opportunity to expressly refer to the role of local rivers, especially in restored condition, in providing a range of natural, social and economic amenity benefit in recreation, education, bio-diversity restoration and so on.

Insert reference to the role of local rivers in clause f).

Core Strategy Objective 10: *Protect and enhance Lewisham's character*

5.14 Lewisham's distinctive local character will be protected through sensitive and beneficial design, in particular those areas requiring managed change and protection such as the borough's conservation areas and listed buildings, yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross. This will mean:

- a. ensuring that new development achieves high standards of urban design and residential quality and contributes to a sense of place and local distinctiveness**
- b. ensuring that new development and alterations to existing buildings are sensitive, appropriate to their context, and make a positive contribution to the urban environment**

c. preserving or enhancing the borough's conservation areas, listed buildings and the other identified elements of the historic environment including archaeological remains.

QWAG comment:

The thrust of this draft policy appears to be the built environment which we agree should be addressed but not to the exclusion of other policies covering other aspects of the locally distinctive environmental. In this case the the borough's rivers are distinctive features to be restored, maintained and made central to the strategy and the vision for the borough.

Where matters relate to what makes the borough distinctive there is no need to create a divide between built amenity and those which are natural / semi natural environment features.

Suggested revised wording:

"Lewisham's distinctive local character will be protected through sensitive and beneficial design, in particular those areas requiring managed change and protection such as the borough's conservation areas, local rivers and listed buildings, yet at the same time creating and improving the environment within the key regeneration and growth areas of Lewisham, Catford, Deptford and New Cross.

The suggested change being the insertion of 'local rivers' after 'conservation areas,' and before 'and listed buildings'.

Core Strategy Objective 11: *Community well-being*

5.15 The Council with its partners will provide and support measures and initiatives that promote social inclusion and strengthen the quality of life and well-being for new and existing residents of the borough by:

- a. addressing deprivation and health inequalities particularly within the wards of Evelyn, New Cross, Lewisham Central, Whitefoot, Bellingham and Downham
- b. creating safer and stronger communities by reducing crime and the fear of crime through innovative design and land use policies**
- c. providing physical, social and green infrastructure**, including high quality health and education facilities, that are accessible and suitable to all of Lewisham's residents, to foster independent community living.

Spatial Policies

Key extracts of Policy 1 (*Lewisham Spatial Strategy*) are:

...**Development will be resisted on open space, including Metropolitan Open Land and Sites of Nature Conservation Importance, and a net gain of open space across the borough will be sought, particularly through on-site provision.**

5. All new development will need to **ensure the principles of good design are addressed and incorporate high standards of sustainable design** and construction, including maximising energy efficiency and the provision of on-site renewables.

6. Development may be required to **carry out certain works, or to provide or contribute towards the provision of measures to mitigate any negative impacts of the development, including appropriate physical, social and green infrastructure**, in accordance with a planning obligation.

Key extracts of Policy 2 (*Regeneration and growth areas*) are:

...The Council, working with its partners, will **secure the necessary infrastructure to support the planned levels of growth and will maximise the physical, social and environmental regeneration opportunities new development will bring** for the benefit of existing and future residents, to address deprivation issues, particularly health inequalities, to improve well-being.

The Regeneration and Growth Areas will support the creation of a more sustainable borough by being the prime location for new development comprising **at least 14,975 new homes**, 100,000 sq.m of new and reconfigured employment floorspace (light industry, workshops, offices), and **62,000 sq.m of new retail** floorspace by 2026.

The above policies (1 and 2) will be delivered through a range of more detailed policies including the following of particular relevance to QWAG:

QWAG comment:

As stated in previous comments the proposed regeneration of central Lewisham is promoted by the authors as restoring the unique town centre role of local rivers when in fact this opportunity has not been taken in ways which will deliver the necessary benefits arising from proper restoration.

The proposed redevelopment of Lewisham town centre presents the opportunity to maximise the natural restoration of the borough's rivers to ensure that they play their natural bio-diversity role and, in doing so, contribute to a renewed sense of place consistent with locally distinctive development.

3B. Reducing flood risk and water management

Para 6.51 "Significant areas of the Regeneration and Growth Areas are located within the Environment Agency's Flood Risk Zones 2, 3a and 3b. This strategy area includes the borough's short stretch of frontage to the River Thames and is also characterised by Deptford Creek (where the River Ravensbourne, having joined the River Quaggy just north of Lewisham, meets the Thames), **the Ravensbourne and Quaggy rivers through Lewisham Town Centre and the Ravensbourne near Catford Town Centre.**"

Para 6.52 "While the Thames poses a potential risk of flooding to properties within this area of river frontage, property is currently protected from flooding by the River Thames Tidal Defences (TTD), up to the 1 in 1,000-year event and flood defences along Deptford (*sic*) Creek and the River Ravensbourne. **As there are no greenfield sites in the borough all development will take place on previously developed land or brownfield land, with a large proportion of available and deliverable sites located within the identified flood zones**, and a large proportion of this strategy area situated within Flood Zone 3a (High Probability).

Para 6.53 "In order **to meet housing targets, regenerate the local area and meet sustainability objectives it will be necessary to develop these sites, subject to adequate mitigation to reduce flood risk.** In consultation with the Environment Agency, the Council's Strategic Flood Risk Assessment and the Sequential Test have been used to ensure suitable land uses and will be used to guide development. This area is also generally the most sustainable location for development within the borough given higher levels of public transport accessibility and the existing mix in land uses."

3C. Open space and environmental assets

Para 6.54 "As the most densely populated part of the borough and the main focus for further development, the provision and accessibility of open space, its **management and the protection of environmental assets within the Regeneration and Growth Areas plays a key part in the success of place making. The Council will focus efforts on improving the accessibility and quality of existing open spaces, while taking opportunities to increase its quantity to address current deficiencies.**"

Para 6.55 "This strategy area has significant open spaces including Pepys Park, Deptford Park, Bridgehouse Meadows, Folkestone Gardens, Fordham Park, the green spaces around St Paul's Church in Deptford, and Brookmill Park, some of which also house Sites of Nature Conservation Importance. Brookmill Park has Metropolitan Open Land status. There are a number of other smaller green spaces and green corridor areas along railway lines. The River Thames and Deptford Creek are significant open space and leisure resources and are Sites of Metropolitan Importance for Nature Conservation."

Para 6.56 “The development of the MELs in Deptford and New Cross will place increasing pressure on open space, particularly the district park deficiency areas. This includes Convoys Wharf and the MELs located at Oxestalls Road, Arklow Road and Childers Street. It may not be physically possible to remedy the district park deficiency due to the dense urban form of this area, however, the Council will contribute to open space by:

- using the North Lewisham Links Strategy to prioritise investment to improve connections and the quality of open space
- Opening new green links through the Oxestalls Road MEL through to the Plough Way MEL, to create an accessible public route along the alignment of the former route of the Surrey Canal to increase permeability, accessibility, and health and recreational opportunities for new and existing residents
- creating new areas of green space for residents within all MELs
- creating new civic spaces and water features at Convoys Wharf
- increasing the connectivity of this area with the rest of the borough, which will improve access to small local parks, and larger local and district park facilities in adjacent areas.”

Para 6.57 “The MEL at Surrey Canal Road is adjacent to Bridgehouse Meadows, which will form the most significant local open space for the use of residents of the new development which is likely to be high density. The area of this open space will be reduced when Phase 2 of the East London Line extension (London Overground) is built. It will require enhancement to provide an adequate open space resource. (Note: Currently this scores low over a range of indicators as shown in the Lewisham Leisure and Open Space Study)

4C. Protect and enhance Lewisham's character

Para 6.71 “**The Lewisham and Catford town centres present development opportunities that have the potential to transform the face of these areas and result in an upgrading of the environment.** In using the density matrix from the London Plan, ‘central’ density levels will be achievable within the Lewisham Major Town Centre while developments in Catford Town Centre will be at ‘urban’ density levels. Tall buildings are considered suitable where they improve and add coherence to the skyline, and where their impact is judged to be acceptable, and of the highest design quality.”

Para 6.72 “In the Deptford and New Cross area, urban design policy will aim to establish visual links with the Thames, increase the connectivity of the street network, improve the streetscape, and create a sense of place. **All riverside development should address the River Thames as an important part of the public realm.** Development within the MELs will create new places in areas that currently lack identity and will build on existing landscape features to preserve local distinctiveness. An example of this will be the landscape treatment along the route of the former Surrey Canal passing through the Oxestalls Road and Plough Way MELs.”

Para 6.73 “The strategy seeks to **benefit local residents who suffer from some of the highest levels of socio-economic deprivation** in the borough. New development will be high quality; it will need to address **severance issues and improve connectivity to parks, shops, schools and local neighbourhoods.** Upgrades to the overall environment will be in line with the design aims of the Core Strategy.”

Para 6.74 “Subject to the detailed considerations set out in Policy 18, the Lewisham and Catford town centres, and the Strategic Site Allocations in Deptford and New Cross, are in principle considered appropriate for **the location of tall buildings** to mark the scope and scale of regeneration that the policies in the Core Strategy will deliver.”

The Spatial Strategy 6

Para 6.75 “The protected vistas, London panorama and the local view that traverse the area will continue to be protected as will the conservation areas, for which any development will need to protect or enhance their characteristics.”

And,

QWAG comment:

Core Strategy Policy 7 (climate change) on page 91 does not expressly cover the role of the natural environment in helping to build in resilience to climate related changes.

Insert a new clause d) as follows:

"d) deploy a range of policies related to the role of the natural environment in aiding resilience to climate-related changes."

7.3.2 Waterways and flooding

7.53 The Core Strategy policy relates to implementing strategic objective 5 by addressing climate change strategic objective 6 by contributing to flood risk reduction and water management.

Overview

7.54 **Planning policy needs to be informed about the risk posed by flooding. This will need to be considered by the Council when it determines how to allocate land, particularly when meeting the development pressures for additional housing while at the same time preserving and managing water resources.**

7.55 The River Thames, Deptford Creek and the Ravensbourne River network define the eight kilometres of waterways within the context of the borough. These **rivers offer biodiversity benefits, good recreation and health benefits** such as the South East London Green Chain, Thames Path National Trail, Waterlink Way and Route 21 of the London Cycle Network.

7.56 The **rivers and waterways play a part in the visual amenity of the borough by creating a natural break in the urban environment.** The rivers also provide the setting for Lewisham's historical past, which can be observed through Deptford's early 19th-century industrial buildings, the preserved residential buildings in St Mary's Conservation Area located to the south of Lewisham Town Centre and Beckenham Place Park. The River Thames itself is London's largest archaeological site.

QWAG comment:

The rivers serve not just as buffer and visual amenity – they are vital to biodiversity as well. Paragraphs 7.55 and 7.56 are weak in that they do not adequately address this role.

7.57 The Core Strategy policy appraises, manages and reduces flood risk in accordance with PPS25 to ensure that flood risk is taken into account through all stages in the planning process:

- to **avoid inappropriate development in areas at risk of flooding**
- to **direct development away from areas at high risk of flooding**
- where new development is **exceptionally necessary in such areas, make it safe** without increasing flood risk elsewhere and, where possible, to reduce risk overall.

7.58 The Local Implementation Plan (Transport), South East London Green Chain, Lewisham Biodiversity Action Plan and the Lewisham Leisure and Open Space Study, all seek to **reinforce the use of waterways in the borough as an asset for environmental, social and economic needs.** PPG13, the Mayor's Blue Ribbon Network and Transport Strategy set out the aspirations for protecting and enhancing the multi-functional nature of waterways so that those uses and activities which require a water or waterside location are enabled and supported.

7.59 The policies supports the implementation of PPS25, the London Plan and is evidenced through Lewisham's Strategic Flood Risk Assessment (SFRA) and Sequential Test.

Core Strategy Policy 10

Managing and reducing the risk of flooding

1. The Council will use the requirements detailed in PPS25 and the London Plan while at the same time implementing the spatial planning and development control recommendations of the Strategic Flood Risk Assessment and the Sequential Test in order to:

- a. sequentially allocate land to guide development into areas least at risk from flooding
- b. **prevent new development from adding to the risk of localised flooding**
- c. reduce the flood risk to people and the built environment and to the development itself and elsewhere by **ensuring the highest design standards contributing to flood reduction and mitigation**
- d. demonstrate that the most sustainable drainage system that is reasonably practical is being incorporated to reduce flood risk, improve water quality and achieve amenity and habitat benefits
- e. conserve water resources by using water saving devices and rainwater harvesting systems.

2. Applicants will need to **demonstrate that their proposal will deliver a positive reduction in flood risk to the borough**, whether that be by reducing the frequency or severity of flooding (for example, through the introduction of SUDS and/or living roofs and walls), or by reducing the impact that flooding may have on the community (for example, through a reduction in the number of people within the site that may be at risk). This will need to be reflected through the inclusion of a positive statement within the detailed Flood Risk Assessment (FRA) for the site that clearly and concisely summarises how this reduction in flood risk will be delivered.

3. The use of the London Plan SPG on Sustainable Design and Construction will be used where relevant.

Core Strategy Policy 11

River and waterways network

1. The Council will **work closely with the Environment Agency to ensure the River Thames, Deptford Creek and the Ravensbourne River Network are preserved and enhanced**. This includes their water quality, landscape, biodiversity, amenity and historical value and wider recreational and health benefits.

2. **Development adjacent to rivers and the waterway network should contribute to their special character by improving the urban design quality and vitality of the river frontages, improve access to the foreshore and naturalise flood defences**, where appropriate.

3. The **Ravensbourne River Corridor Improvement Plan**, in conjunction with the London Plan policies relevant to climate change and water, will be used to guide works and development along this waterway.

QWAG comment:

Core Strategy Policy 11 is weak for two reasons.

Firstly, the role of the Environment Agency is recognised but not the role of other players in the restoration and maintenance of rivers. It is a requirement for the core strategy to involve statutory bodies and it would be fitting given the council's statements elsewhere about community involvement for the strategy to make explicit reference to the role of community bodies with a pivotal role in river restoration.

Secondly, regarding paragraph 2 above, design should be required to add to quality of natural rivers.

We recommended change to the current wording as follows:

"The Council will work closely with the Environment Agency and community organisations to ensure the River Thames, Deptford Creek and the Ravensbourne River Network are preserved and enhanced. This includes their water quality, landscape, biodiversity, amenity and historical value and wider recreational and health benefits."

And,

"Development adjacent to rivers and the waterway network should contribute to their special character by improving the urban design quality and natural ability of the rivers and waterways to function, the vitality of the river frontages, improve access to the foreshore and naturalise flood defences, where appropriate."

Policy justification

7.60 The policy helps to **reduce flood risk through the appropriate location, design and construction of development and the sustainable management of surface water run-off. The policy seeks to ensure that new development should be seen as an opportunity to reduce the causes and impacts of flooding by measures such as provision of flood storage**, use of SUDS, and re-creating the functional flood plain.

7.61 In consultation with the Environment Agency, **flood risk in Lewisham has been appraised by identifying flood risk areas and the level of risk** in accordance with PPS25 through a local Strategic Flood Risk Assessment (SFRA). The SFRA has considered the risk of flooding throughout the borough and has informed the allocation and distribution of land uses for future development. This was discussed in the Spatial Strategy in Section 6.

1. Strategic Flood Risk Assessment

7.62 In accordance with PPS25 and the London Plan, **a Strategic Flood Risk Assessment (SFRA) has been produced, in consultation with the Environment Agency (EA), to better understand where and how flooding occurs in the borough and to offer potential design recommendations to influence new development.** All new developments will need to take into account the risk of flooding, and where applicable, apply the Sequential Test and Exception Test.

7.63 Lewisham's SFRA identifies that **at least one-fifth of all residential and non-residential properties in the borough are at some risk of flooding** as well as the risk to people. The properties generally lie within areas outlined for major regeneration and growth and range from Deptford and New Cross, near the Thames and Deptford Creek; to Lewisham, Catford, Lee Green, Southend and Downham, which run along the River Ravensbourne, River Quaggy and the Pool River corridor.

7.64 The results are based on existing data currently held by the EA. The EA adopts a Flood Zone methodology, namely, 1, 2 or 3, with 3 being at greater risk of flooding, to properties and endangering human life than Flood Zone 1. The SFRA has outlined specific development management recommendations that should be applied to development within Flood Zone 3a High Probability to minimise the damage to property, the risk to life in case of flooding, and the need for sustainable drainage systems (SUDS). It is essential that the applicant carries out a detailed Flood Risk Assessment (FRA) to consider the site-based constraints that flooding may place on the proposed development.

7.65 Properties and infrastructure within the borough are also at risk of flooding from other sources. These include **groundwater flooding, the surcharging of the underground sewer system, the blockage of culverts and gullies (which results in overland flow), and surface water flooding.**

2. Sequential Test

7.66 The PPS25 Practice Guide advocates the application of a sequential approach when allocating land, taking into consideration all sources of flooding. From a spatial planning perspective, with the exception of areas known to be susceptible to regular (and problematic) groundwater flooding, it is

generally considered unreasonable to restrict future development to areas that may have suffered a localised flooding incident in years past.

7.67 The Council's Sequential Test has informed and justified the allocation of land as part of the Spatial Strategy contained in Section 6. The Sequential Test sequentially guides development into areas least at risk from flooding (Flood Zone 1). Only after sites in Flood Zones 1 and 2 have been discounted should the suitability of Flood Zone 3 sites be considered. The Exceptions Test is the second step in the sequential approach and gives greater consideration to proposals.

7.68 However, implementation remains critical and land use acceptability will be improved subject to the approved mitigation techniques outlined in the SFRA. The potential risks of localised flooding cannot be overlooked during the design process. Although the identified risks will not typically result in widespread damage or disruption, a proactive approach to risk reduction through design (such as raising floor levels, raising electrical wiring, basement design, sustainable drainage) can mitigate the potential for damage, both to the development itself and elsewhere.

3. River Ravensbourne and River Quaggy

7.69 The Rivers Ravensbourne and Quaggy are key features of the borough and properties within the vicinity of the river corridors are subject to a potential risk of fluvial (river) flooding. Investment has been made into flood defence to reduce the risk of flooding, particularly within Lewisham Town Centre. However, fluvial flooding remains a threat to property (and potentially life).

7.70 Both the Council and the Environment Agency are encouraging a more sustainable planning-led approach to further reducing flood risk in the future. Investment has been made in flood risk management along the Rivers Ravensbourne and Quaggy. This has included the construction of raised flood defences within Lewisham, and the development of dedicated landscaped areas for flood storage as part of ongoing regeneration. This is of particular note in Manor Park, Ladywell Fields, Lewisham Town Centre at Cornmill Gardens and proposals for the Lewisham Gateway scheme. These successful schemes have demonstrated that it is possible to put the river back at the heart of new development and our open spaces.

7.71 The Council and the EA are working in partnership to prepare a River Corridor Improvement Plan for the Ravensbourne River. The aim is to use the opportunities from regeneration and other local initiatives to bring the River Ravensbourne back to the heart of Lewisham, as an attractive focal point for local communities. This is a design-led spatial improvement plan to maximise the principles of 'Making Space for Water' and the Blue Ribbon network.

4. Localised flood risk

7.72 A potential risk of flooding from other (non-river related) sources exists from possible sewer surcharging and surface water flooding as a result of heavy rainfall and/or blocked gullies. With changing climate patterns, it is expected that intense storms of heavy rainfall will become increasingly common. It is vitally important therefore that planning decisions recognise the potential risk that increased runoff poses to property and plan development accordingly so that future sustainability can be assured.

7.73 The overloading of the sewer system due to inflows exceeding the underground system capacity (i.e. resulting in surcharging) is a potential problem in any urban area. It is important to recognise that surface water networks are typically designed to cater up to a 1 in 30 year event. Surface water flooding will occur when the sewer system is overloaded and/or a system blockage occurs.

Impacts of climate change

7.74 The SFRA (Strategic Flood Risk Assessment) notes that climate change will not markedly increase the extent of river flooding within most areas of the borough. Consequently, few areas that

are currently situated outside Zone 3 High Probability will be at substantial risk of flooding in the foreseeable future. This is an important conclusion from a spatial planning perspective.

7.75 However, those properties (and areas) that are currently at risk of flooding may be susceptible to more frequent, more severe flooding in future years. It is essential therefore that the development management process (influencing the design of future development within the borough) carefully mitigates against the potential impact that climate change may have on the risk of flooding to property.

7.76 It is of particular importance to note that the information on the **risk of flooding is based on the rivers Thames and Ravensbourne over topping their banks in times of high river surging or extreme rainfall events and the assumption that there are no flood defences present**. This is a point made explicit in the SFRA. It should also be noted that the likelihood of this happening is rare but not impossible and the EA has remedial measures such as the Thames Barrier, which performs extremely well in keeping the North Sea out of the River Thames catchment area. This does not diminish the ongoing risks expected from more frequent storms and the cumulative impacts of increased development within the catchment making local rivers more susceptible to flooding.

7.3.3 Open space and biodiversity

7.77 The Core Strategy options relate to implementing:

- strategic objective 5 by addressing climate change issues
- strategic objective 6 by contributing to flood risk reduction and water management
- strategic objective 7 by protecting and enhancing the borough's open spaces and environmental assets and strategic objective 11 by contributing towards community well-being.

Overview

7.78 The **biodiversity of our environment is an essential system on which we and wildlife depend**. The public parks, gardens and **open spaces within Lewisham support areas of biodiversity importance, play a major role as spaces of recreation and valued landscape, and contribute to climate regulation**. Well-designed and managed open spaces can help bring communities together and provide a place to meet and relax or enjoy sport and active recreation. This has benefits of its own as it provides space for healthy lifestyles and contributes to well-being.

7.79 The Spatial Strategy showed the distribution of open space across the borough and the role this played within each strategy area. Collectively open space in Lewisham, in public and private ownership, makes up almost 20% of the borough's land area, of which:

- 373 ha are classified as parks
- 72 ha are classified as semi-natural greenspace
- 90 ha are classified as green corridors (rail side land)
- 521 ha are designated as Sites of Importance (natural and semi-natural conservation Importance)
- 25 ha are classified as allotments and community gardens
- 53 ha are classified as cemeteries and churchyards.

QWAG comment:

We note that rivers are not identified as a feature in the list of amenity. This is of concern because of the locally distinctive role which rivers can and do play which is mentioned by the authors for example, in describing the redevelopment of Lewisham town centre.

Rivers should be included as a measured space as has been done for amenity types mentioned above; it is mentioned in supporting paragraph 7.8.

Revised wording as follows:

"7.79 The Spatial Strategy showed the distribution of open space across the borough and the role this played within each strategy area. Collectively open space in Lewisham, in public and private ownership, makes up almost 20% of the borough's land area, of which:

- 373 ha are classified as parks
- 72 ha are classified as semi-natural greenspace
- 90 ha are classified as green corridors (rail side land)
- 521 ha are designated as Sites of Importance (natural and semi-natural conservation Importance)
- **xxx are local rivers and waterways (natural and semi natural conservation importance and potential especially in the interaction with other amenity)**
- 25 ha are classified as allotments and community gardens
- 53 ha are classified as cemeteries and churchyards."

7.80 This creates a **network of spaces** from the large expanses of Blackheath in the north and Beckenham Place Park in the south, with a network of smaller parks and open spaces, playing fields, both public and private, and green routes in between. The River Thames itself provides a valuable open space resource. Other types of open spaces are also important in the context of a densely built-up area, such as roof terraces, wildlife gardens, allotments, gardens and amenity areas around housing estates. Civic spaces and squares, such as Cornmill Gardens, also form part of the open space network.

7.81 The borough hosts part of the **South East London Green Chain**. This is a network of inter-linked open spaces that extend through Lewisham and the neighbouring boroughs of Bexley, Greenwich and Bromley. The Green Chain has a network of recreational walking and cycle routes and it forms part of the 'Capital Ring', a strategic walking route linking inner London boroughs by a network of paths through open spaces, green links, canals and rivers. Proposals exist to extend the Green Chain walk within Lewisham via parks on the western side of the borough (Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park), linking to Crystal Palace Park in the London Borough of Bromley. **This will involve redesignation of these Local Public Open Spaces as Metropolitan Open Land to reflect the strategic significance of the new Green Chain Link.**

7.82 Lewisham's rivers (a short section of the Thames, Deptford Creek, 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 and are important links to sustain biodiversity**. The **naturalisation of waterways is a priority for the Council** and a suitable buffer zone around watercourses can help to maintain the character of rivers and provide refuges for wildlife, as well as pleasant and practical recreational routes such as the Waterlink Way and the long distance Thames Path. These routes are referred to further in section 7.4.1, as they form part of the recognised strategic cycle network.

7.83 The borough also has a number of London squares that provide a locally distinctive feature, particularly the sequence of small open spaces on Rushey Green between Catford and Lewisham following the line of a former watercourse, and two Grade II Historic Gardens at Horniman Gardens and Manor House Gardens.

7.84 The Core Strategy policy **ensures that areas of open space are protected and conversely that areas of deficiency are identified and addressed. The policy reflects the Council's proactive approach to the protection, promotion and management of biodiversity**. This can be achieved by resisting development that would have a significantly adverse impact on the population or conservation status of protected species or priority species identified in the UK, London and borough biodiversity action plans.

7.85 Government policy guidance is contained in a number of documents. PPG2 discusses the protection of Metropolitan Open Land. PPS9 seeks to promote sustainable development by ensuring that biological and geological diversity are conserved, enhanced and restored. PPS17 focuses on supporting urban renaissance, promoting social inclusion, community cohesion, health and well-being. The Core Strategy will seek to **prevent the development of open space unless an assessment of open space otherwise dictates**.

7.86 The Core Strategy policy covers: **the protection of existing open space areas within the borough deficient in open space the creation of new open space in large developments the quality and maintenance of public open space the protection of natural habitats and**

biodiversity, including ancient woodlands (,) the river network London Squares and Historic Parks and Gardens.

7.87 The policy has been prepared in accordance with PPG2, PPS9, PPG17, the London Plan and has been evidenced through the Lewisham Leisure and Open Space Study assessing the borough's open space, sport, leisure and recreation facilities.

Core Strategy Policy 12

Open space and environmental assets

1. In recognising the strategic importance of the natural environment and to help mitigate against climate change the Council will:

- a. conserve nature
- b. green the public realm
- c. provide opportunities for sport, recreation, leisure and well-being.

use the opportunities from regeneration and other local initiatives to bring the River Ravensbourne back to the heart of Lewisham, as an attractive focal point for local communities

2. This will be achieved by:

- a. protecting Metropolitan Open Land, public open space, **urban green space and green corridors from inappropriate built development to ensure there is no adverse effect on their use**, management, amenity or enjoyment in accordance with the principles of PPG2 and the London Plan
- b. maintaining and improving the **publicly accessible open space network**, such as the Waterlink Way, the Thames Path, the South East London Green Chain, the East London Green Grid, parks and gardens, playing fields, nature reserves, allotments, community gardens, amenity green space, cemeteries and churchyards as well as smaller open spaces that have townscape quality
- c. designating additional Metropolitan Open Land in accordance with the London Plan definitions, in particular Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park due to the role they perform in the South East London Green Chain
- d. improving the quality of **accessibility to existing open space** by public transport, cycle and foot
- e. preserving or enhancing the **local biodiversity and geological conservation** interests in accordance with national and regional policy, in the form of PPS9 and the London Plan by designating Sites of Nature Conservation Importance
- f. protecting trees and preventing the **loss of trees of amenity value**
- g. **seeking new on-site provision as part of new development and/or improved accessibility to existing areas of public open space in the identified areas of open space deficiency within the wards of Brockley, Catford South, Lee Green, Perry Vale and Telegraph Hill**
- h. seeking exemplary design for **new, and improvements to existing, public open space** to ensure publicly accessible and usable open space is considered in the context of the local character and its distinctive historical qualities working with the Environment Agency (EA) where appropriate
- i. maximising opportunities for sport and **recreation through well-designed and managed spaces**, which takes into account the Mayor's Children and Young People's play space requirements in a safe environment
- j. promoting living roofs and walls in accordance with London Plan policy and Core Strategy Policy 8
- k. promoting and supporting local food growing and urban agriculture.

3. Planning obligations will be sought to ensure the implementation of this policy where appropriate.

Policy justification

7.88 The national statutory guidance on **maintaining the supply of open space** is clear. PPS9 seeks to promote sustainable development by ensuring that biological and geological diversity are conserved, enhanced and restored. PPG17 states in paragraph 10 that open space should not be built on or developed without a robust and up-to-date assessment proving that the land is surplus to requirements. PPG2 contains further guidance on protecting MOL. In combination these national policies provide a sound framework for the protection of Lewisham's existing open space.

7.89 The Lewisham Leisure and Open Space Study found that per 1,000 population, Lewisham has 1.41 ha of open space per person. With population growth, to maintain this level in 2026, there would be a **requirement for an additional 63.55 ha of open space** across the borough.

7.90 Due to finite land and development pressures within the borough, **the opportunities to create additional open space are limited. The policy therefore emphasises protecting existing open space including allotments and open space along river and railway corridors.** Apart from provision of additional open space at MELs and supporting on-site provision as part of new development, the policy seeks to ensure qualitative improvements to open space and enhancements to accessibility and connectivity to and between open space. **Improvements to biodiversity should not be restricted to conventional habitats** but should extend to the increased use of living roofs and living walls in private development.

7.91 Traditional 'transport infrastructure' within the borough plays a major biodiversity role. Many of the railway corridors are of nature conservation value and this role can be designated to ensure a level of protection. In addition, the borough's streets have many roles, including that of linear park, with front gardens providing varied habitats, trees in those gardens or planted in the footway / carriageway giving shape to the street and all adding to the general attractiveness of the street.

7.92 The policy supports Lewisham's Biodiversity Action Plans. The Plans demonstrate the links that the **conservation of Lewisham's biodiversity can make to the Council's continuing programmes within various directorates.** Once embedded in Council policies, the Action Plans will serve as benchmarks against which we may monitor progress.

7.93 PPG17 informs local authorities that they should seek planning obligations here the quantity or quality of provision is inadequate or under threat, or where new development increases local need. Further advice on the process is available in PPG17 and in the associated good practice guide.

7.94 The London Plan seeks to protect and enhance open spaces, biodiversity and nature conservation in London, including the access to London's network of open spaces. Of particular importance is the **maintenance and protection of Metropolitan Open Land (MOL)**, which is considered to have strategic importance for the whole of London. The Council will add to MOL given the strategic role assigned to many of the parks within Lewisham.

7.95 The London Plan requires that where new development occurs, provision for play and informal recreation, based on the expected child population, should be allowed for. This needs to ensure they are of good quality and secure with safe access.

7.96 The policy supports the Mayor of London's Great Spaces for London Initiative which is intended to revitalise London's unique network of public spaces, streets, parks and riverside walks. This seeks to create or upgrade 100 public spaces in London in order to ensure that all in London can benefit from good public space. **Lewisham Town Centre transport interchange is identified in this document as requiring high quality design**, as is the Kender Triangle at New Cross Gate.

7.97 The policy is **further justified by the three broad aims of the Lewisham Physical Activity, Sport and Leisure Strategy (2006-2011) which aims to increase participation in physical activity** and sport, enable the Lewisham community to develop its potential in sport and develop an appropriate infrastructure of facilities.

7.98 The policy addresses the **aims of the Green Chain Policy document (1977)**, which are to improve public access to and through the area, and to create new public footpaths and enhance access where opportunities occur.

7.4.2 High quality design for Lewisham

7.132 The Core Strategy policies relate to implementing:

- strategic objective 1 by contributing to regeneration and securing physical and socio-economic change
- strategic objective 10 by protecting and enhancing Lewisham's character
- strategic objective 11 by improving community well-being.

Overview

7.133 High quality, well-designed new development is a key factor that will contribute to the long-term sustainability of communities in Lewisham. In order to be successful new development must meet the qualities required by national and regional policy and guidance and also reflect and be sympathetic to the local physical and social characteristics of the borough.

7.134 Lewisham has **distinctive topographical characteristics**, which will need to be considered as part of any development proposal. This was broadly outlined in the Spatial Strategy contained in Section 6 and has the following key characteristics:

The **Ravensbourne Valley** passes from north to south through the borough surrounded by low hills topped with open spaces which provide a framework of local views and panoramas which will continue to be protected. The major town centres of Lewisham and Catford are located in this valley where major development is proposed. **Lewisham Gateway is sited on the confluence of the rivers Ravensbourne and Quaggy, which should be enhanced in development proposals.**

Core Strategy Policy 15

Regeneration and Growth Areas

3. Development should achieve the following design aims:

- a. Achieve 'central' density levels within the Lewisham Major Town Centre.
- b. Achieve 'urban' density levels in Catford Town Centre.
- c. New developments in Lewisham and Catford town centres should result in a radical upgrading of the social and physical environment and, in order to be successful, will need to allow for tall buildings of the highest design quality where they improve and add coherence to the skyline, and where their impact is judged to be acceptable.
- d. In the Deptford and New Cross area, urban design policy will aim to establish visual links with the Thames, increase the connectivity of the street network, improve the streetscape, and create a sense of place with radical improvements to the social and physical environment. Tall buildings may be appropriate in certain locations subject to Core Strategy Policy 18.

Strategic site and major regeneration areas

Lewisham Gateway – strategic site allocation 6

Para 8.43 **“Both the River Ravensbourne and River Quaggy pass through the site but are presently culverted and canalised. Comprehensive redevelopment of the site presents an opportunity to restore the historic role of these rivers as a focal point for the local community, improving both the natural environment and amenity for residents, workers, shoppers and public.”**

1. The Lewisham Gateway site is allocated for mixed use development. The Council will require a comprehensive phased approach to redevelopment in line with an approved Masterplan for up to 100,000 sq.m that delivers the following priorities:

- a. new road layout to establish direct pedestrian linkage between the public transport interchange and Lewisham High Street, parking, servicing, associated infrastructure and improvements to the public transport interchange, as well as open space, rivers and water features
- b. extends the prime commercial/retail area north of the existing town centre befitting a metropolitan town centre

- c. provides for a mix of retail uses to support Lewisham achieving metropolitan status (A1, A2)
- d. provides for a mix of restaurant, food and drink uses (A3, A4, A5)
- e. provides up to 8,000 sq.m of office use (B1)
- f. provides up to 3,000 sq.m of hotel space (C1)
- g. provides up to 5,000 sq.m of education and health space (D1)
- h. provides up to 5,000 sq.m of leisure use (D2)
- i. provides at least 3,500 sq.m of public open space**
- j. creates a sustainable high density residential environment at a density commensurate with the existing PTAL (public transport accessibility) rating of the site or the future PTAL rating achieved through investment in transport infrastructure and services
- k. provides for a mix of dwelling types accommodating, subject to an acceptable site layout, scale and massing, up to 800 new homes (C3) with a proportion of on site affordable housing.

2. The following urban design principles have been identified as key features of any masterplan for the site:

- a. Improve the transport interchange to allow people to make easy connections between buses, trains and the DLR and relocates the bus layover to Thurston Road.
- b. Revise the road alignment of part of Lewisham High Street, Rennell Street, Molesworth Street and Loampit Vale, including a permeable network of cycle and pedestrian routes to improve accessibility between the station and the town centre.
- c. Improve the river environments including the provision of a coherent public space to the heart of the development, which focuses on the confluence of the Rivers Quaggy and Ravensbourne. Provide high quality buildings and public spaces, providing active frontages on all key sides of the development including Molesworth Street and Lewisham Road.**
- d. Improve pedestrian and cycle connections to and through the site to surrounding neighbourhoods
- e. Ensure there are visual links to St Stephen's church.
- f. Reinforce and enhance the Quaggy River corridor and Waterlink Way to add visual amenity and provide a buffer between the site and St Stephen's Conservation Area.
- g. Establish a series of buildings, organised around high quality public realm, with varying footprints to incorporate a wide range of uses, offering the opportunity for flexible sub-division of retail units.
- h. Provide a clear visual and physical order to the layout; provide axial views of key buildings and features in order to make the overall environment legible.

QWAG comment:

Paragraph c) above the strategy does not mention the biodiversity value and the compound benefit of carrying out full and effective restoration.

We submit revised working as follows:

"c. Improve the river environments to be fully-functioning restored natural rivers, including the provision of a coherent public space to the heart of the development, which focuses on the confluence of the Rivers Quaggy and Ravensbourne. Provide high quality buildings and public spaces, providing active frontages on all key sides of the development including Molesworth Street and Lewisham Road."

9.2 Commitment to partnership working

9.6 The Council is **committed to working in partnership with a range of public, private and voluntary sector organisations** in order to ensure the delivery of the Core Strategy's vision, strategic objectives, spatial strategy and policies.

9.7 The Council is part of the Local Strategic Partnership (LSP), which has adopted a **Sustainable Community Strategy (SCS) and a Local Area Agreement (LAA) aimed at enhancing the quality of life for local residents**, based on the needs and aspirations of Lewisham's citizens.

The successful implementation of these strategies is vital if Lewisham is to achieve the Core Strategy's strategic objectives. Links between the SCS, the Core Strategy and LAA targets have been made to ensure consistency in delivery.

9.8 The Council works with key partners and will continue to develop these relationships to ensure the delivery of the Core Strategy. Key partners include:

- Lewisham Strategic Partnership (LSP)
- public organisations such as the Greater London Authority, London Development Agency, Thames Gateway Development Corporation, the Homes and Communities Agency and the Environment Agency
- Transport for London, Network Rail and transport operators
- landowners and potential developers
- registered social landlords
- existing businesses and business organisations
- **community and voluntary sector organisations**
- local residents
- NHS Lewisham
- the emergency services and
- South-east London Boroughs' (Bexley, Bromley, Greenwich, Southwark).

A key objective running through the Core Strategy is the desire to address **health inequalities** across the borough. The JSNA has directly informed the work of the LSP and its ambitions for the borough, which has been reflected through the Core Strategy. This is particularly important as it is estimated that as little as 10% of the causes of health inequalities fall within the direct influence of the NHS. Through the JSNA and the adoption of a 'big picture' approach to health, the work of NHS Lewisham and the Council can allow resources to be focused on those areas and population groups with the highest level of need.

9.12 The Council is actively working with NHS Lewisham to address **health inequality**. A key project is the implementation of the North Lewisham Health Improvement Plan as well as maintaining and enhancing access to services and facilities, across the borough, to facilitate a healthy lifestyle. This includes **access to fresh food, parks, open spaces, areas for walking and cycling and improving connectivity around the borough and the quality of such connections**. One means of measuring achievement will be through the targets established through the Local Area Agreement.