

Integrated Impact Assessment (IIA) of the Lewisham Local Plan

IIA Report

November 2022

Quality information

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Revision history

Revision	Revision date	Details	Signed-off by
V1	June 2022	Draft	LB Lewisham Officer
V2	Sept 2022	Final draft for M+C	LB Lewisham Officer
V3	Sept 2022	Updated draft for M+C	LB Lewisham Officer

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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Integrated Impact Assessment (IIA) in support of the emerging Lewisham Local Plan. Once in place, the Local Plan will establish a spatial strategy for growth, identify locations for development to deliver upon the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 IIA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. IIA involves undertaking the legally required Sustainability Appraisal (SA)¹ process alongside: Equality Impact Assessment (EqIA), which is undertaken in order to discharge the Public Sector Equality Duty; and Health Impact Assessment (HIA) to have regard to health impacts and promote the reduction of health inequality.

1.2 IIA explained

- 1.2.1 It is a requirement that IIA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.
- 1.2.2 In-line with the Regulations, a report (**the IIA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be considered alongside consultation responses when finalising the plan.
- 1.2.3 More specifically, the IIA Report must answer the following **three questions** -
- What has Plan-making / IIA involved up to this point?
 - including with regards to consideration of 'reasonable alternatives'
 - What are the IIA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This IIA Report²

- 1.3.1 At the current time the Council is consulting on the final draft ('proposed submission') version of the local plan, under Regulation 19 of the Local Planning Regulations. This IIA Report is published alongside, in order to inform the consultation and subsequent plan finalisation (Section 10 discusses 'next steps').

N.B. this report supersedes the Interim IIA Report published alongside the early draft plan in 2020.

Structure of this report

- 1.3.2 This report considers the three questions (above) in turn. Before answering the first question, there is a need to further set the scene by answering two initial questions:
- What is the plan scope?
 - What is the IIA scope?
- 1.3.3 The IIA Report is structure as per the Interim IIA Report (2020).

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of IIA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an IIA Report is published for consultation alongside the 'Proposed Submission' plan document

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the IIA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2 What is the plan scope?

2.1 Introduction

2.1.1 The aim here is to explain more fully the context to plan preparation and the plan vision / objectives.

2.2 The plan area

2.2.1 Lewisham is an inner-London borough strategically located to the south of the River Thames, with connections to Canary Wharf and Central London. It has major centres at Lewisham and Catford, and two defined London Plan Opportunity Areas at the New Cross/ Lewisham/ Catford corridor and at Deptford Creek/ Greenwich Riverside. Lewisham has experienced rapid growth in both population and households over the last ten years and has a relatively young and very ethnically diverse population.

2.2.2 Many parts of Lewisham Borough have seen significant investment in recent years. This has been largely concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas.

2.2.3 However, Lewisham is the 7th most deprived borough in London. Life expectancy for male residents is below the national average, and there are significant differences in life expectancy across wards. Further, research points to the disparities in impacts of Covid-19 on health and wellbeing, with proportionally higher risks for BAME groups. A further key consideration is obesity, with 38 per cent of children in Year 6 obese, and children living in the Borough's most deprived areas *twice* as likely to be obese or overweight.

2.2.4 Lewisham's diverse history has led to a range of distinct places and neighbourhoods, each with its own unique character and identity. This is reflected in the historic environment that features 28 Conservation Areas as well as Lewisham's varied and vibrant cultural scene.

2.2.5 Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Whilst private rental prices have remained relatively low, median rental prices have risen from £99,995 in 2000 to £430,000 in 2020, an increase of 330% over 20 years.

2.2.6 Despite Lewisham's strategic inner-London location, its local economy is generally small and inward looking. A process of plan-led industrial land consolidation has occurred in recent years to facilitate regeneration in the north of the Borough, and the current situation sees employment sites under pressure for change of use to residential, despite strong demand for workspace.

2.2.7 The Creative and Digital Industries (CDI) is an emerging growth sector, and north Lewisham is home to one of London's first Creative Enterprise Zones. The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern.

2.2.8 Lewisham is one of the greenest Boroughs in London with around one-quarter of its area being green/open space. Despite this, there are parts of the Borough that are deficient in terms of public access to open space. This is often a result of natural and constructed features, which can act as a barrier to movements.

2.2.9 Whilst carbon dioxide emissions and total energy consumption have steadily fallen across Lewisham, emissions remain an issue and the Council declared a climate emergency in February 2019. The South East London Combined Heat and Power (SELCHP) plant offers potential to support a district heat network to supply low carbon heat (relative to gas boilers) to homes and businesses in the north of the Borough.

2.2.10 Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer connectivity. Large parts of the Borough are covered by an Air Quality Management Area, including along main and arterial roads.

2.2.11 The new London Plan (2021) identifies the proposed Bakerloo Line Extension (BLE) as a key strategic transport infrastructure project. The preferred route of the BLE proposes phase 1 stations at New Cross Gate and Lewisham; and a potential phase 2 of the BLE is being discussed that would run further south into the Borough. The BLE presents a key opportunity to bring major investment to the Borough.

Figure 2.1: LB Lewisham



2.3 Legislative and policy context

- 2.3.1 The Local Plan is being prepared under the Town and Country (Local Planning) Regulations 2012 and underpinning primary legislation. It must reflect current government policy, as set out in the National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015); and must also be prepared mindful of Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- 2.3.2 The Local Plan is also being prepared under the London Plan (2021) which, amongst other things, sets out housing and jobs growth targets for the two opportunity areas and housing growth targets for the Borough as a whole (an overall target and a target for homes from small sites).
- 2.3.3 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic policies of: the Greater London Authority (GLA); Transport for London; the NHS Lewisham Clinical Commissioning Group; London Economic Action Partnership (LEAP); and environmental bodies including the Environment Agency, Historic England and Natural England. LB Lewisham must also cooperate with neighbouring areas, particularly the immediately adjacent south London authorities of Southwark, Greenwich and Bromley.
- 2.3.4 Finally, it is important to note that the plan will be prepared mindful of any 'made' or emerging Neighbourhood Development Plans (NDPs), with two 'made' NDPs and two further in preparation. NDPs must be in general conformity with the Local Plan, which means that made and emerging NDPs may need to be reviewed to bring them into line with the emerging plan. However, it is equally the case that made and emerging NDPs will be a consideration when preparing the Local Plan.

2.4 Plan aims and objectives

- 2.4.1 Amongst other things, the Local Plan is being prepared in order to:
- Respond to significant changes to **the wider planning context** – since the Lewisham Core Strategy was adopted in 2011, the NPPF has been introduced and the London Plans has twice been updated.
 - Respond to the **climate emergency** – in February 2019 the Council declared a climate emergency, such that there is a need to focus on both mitigation / decarbonisation and adaptation / resilience, also mindful that climate change is an issue of social justice as the greatest impacts will be on the most vulnerable.
 - Realise the objective of **an Open Lewisham** – the Local Plan will reflect the aspirations and priorities of local communities and the Council's Corporate Strategy 2018-2022. It comprises a single document providing a clear planning and decision-making framework, with a renewed emphasis on Lewisham's distinctive neighbourhoods and places. This will be particularly useful to community groups preparing neighbourhood plans and others who are seeking to get involved with planning locally.
 - Meet **local needs** for genuinely affordable housing, jobs and community facilities, including high quality green spaces - the Core Strategy and its supporting plans have helped the Council and its partners to deliver a significant increase in homes along with investment in town centres, new workspace and infrastructure. Most of the key strategic development sites identified in the existing plan have now either gained planning consent, been built, or are under construction. With the London Plan and NPPF setting ambitious growth targets there is a pressing need to identify additional development sites.
 - Secure the delivery of the **Bakerloo Line extension** and other transport infrastructure – investment in transport infrastructure is needed to help tackle deprivation and improve health outcomes locally, as well as to accommodate and promote Good Growth. The London Plan confirms a commitment to upgrade and extend the Bakerloo line to Lewisham. The new Local Plan is needed to help secure the delivery of the tube line extension and set a framework to maximise the local benefits it can bring.
- 2.4.2 The objectives of the Local Plan are as follows:
- An Open Lewisham as part of an Open London
 - Sustain and create inclusive neighbourhoods and communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places. Coordinate investment in such a way as to promote equality of opportunity and for everyone to live, learn, work and relax in Lewisham.

- Housing tailored to the community with genuinely affordable homes
 - Proactively respond to population growth and help to meet London and Lewisham’s housing needs by positively managing the delivery of new homes across the Borough.
 - Ensure Lewisham’s existing and future residents benefit from good access to a wide range and mix of high quality housing, including genuinely affordable housing, which is tailored to meeting the varied needs of the community. This includes the needs of those from all age groups and at different stages of life, families and those with specialist housing requirements.
 - Foster and help to reinforce community cohesion through the provision of housing that enables people to both settle in the local area and remain rooted to it.
- A thriving local economy that tackles inequalities
 - Strengthen Lewisham’s role in the wider London economy by expanding the local business base. Steer investment to town centres and other employment hubs and support the growth of sectors in which the Borough maintains or is poised to perform a key role, including the cultural, creative and digital industries. Enable the development of green industry and promote the greening of existing industries to reduce their environmental impacts and support the transition to a low carbon, circular economy.
 - Increase the number and variety of local jobs and business opportunities by making the best use of employment land and providing suitable space to support businesses of all sizes, along with securing affordable workspace and workplace training opportunities.
 - Ensure town and local centres remain the focus for community activity and harness their unique attributes to support growth, including in retail and other commercial, leisure and cultural activities whilst promoting a thriving evening and night-time economy. Coordinate investment to secure Lewisham Major Centre’s future role as a regionally important Metropolitan Centre, enable the regeneration in Catford Major Centre into London’s greenest, and to support the vitality and viability of town centres elsewhere.
- A greener Borough
 - Build on London’s National Park City status and ensure all people in Lewisham, including local residents, benefit from access to high quality green spaces by protecting, enhancing and connecting the Borough’s network of parks, open and water spaces. This includes the delivery of a Green Grid which improves linkages to and between these spaces.
 - Promote and protect the ecological, biodiversity and amenity value of the Borough’s natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise. Address the decline in the number and distribution of species and deliver Biodiversity Net Gain across the Borough.
 - Manage waste responsibly by prioritising implementation of the most sustainable options in the waste hierarchy and safeguarding appropriate sites for the Borough to meet its strategic waste apportionment requirement.
- Responding to the climate emergency
 - Realise long-term reductions in energy use and carbon emissions in helping London to become a zero carbon city by 2050, by increasing the use of sustainable transport modes (including walking and cycling) and ensuring that new development is designed to reduce car use, maximise energy efficiency, and integrate greening measures to limit the urban heat island effect.
 - Manage flood risk by ensuring that new development is appropriately located, implementing Sustainable Drainage Systems, retaining and enhancing flood defences including through river restoration works. Improve the ecological and water quality of the rivers Thames, Ravensbourne, Quaggy and Pool and their corridors.
- Celebrating local identity
 - Retain, reinforce and help shape the distinctive character and identity of Lewisham’s neighbourhoods and communities, including townscapes, by ensuring that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment. Ensure new development is designed, constructed and maintained to a high quality standard.

- Make the optimal use of land and where possible facilitate the regeneration and renewal of localities within the London Plan Opportunity Areas at Deptford Creek / Greenwich Riverside and New Cross / Lewisham / Catford, and at key growth locations elsewhere, and through this process manage change to reinforce and build upon local character, whilst delivering transformational improvements to the environment including in the wider Thames-side area.
- Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it. Work with local communities and community groups, neighbouring authorities and other stakeholders to sustain the value of local heritage assets and their setting, along with the Outstanding Universal Value of the Maritime Greenwich World Heritage Site.
- **Healthy and safe communities**
 - Address the wider determinants of physical and mental health and deprivation in an integrated and systematic way to improve the wellbeing of the population, to reduce health and other inequalities particularly where these are geographically concentrated, and to give children and young people the best start in life.
 - Create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution.
 - Promote cohesive and mixed communities along with walkable and liveable neighbourhoods by ensuring development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
 - Create safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.
- **Securing the timely delivery of infrastructure**
 - Provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely delivery of new infrastructure, including through the use of Community Infrastructure Levy funding and planning contributions.
 - Work in partnership with central government, the Greater London Authority, Transport for London, Network Rail and other stakeholders to reduce car use and increase public transport capacity and accessibility across the Borough, as well as to unlock the development potential of specific localities and strategic sites, including through delivery of the Bakerloo Line Extension.
- **Ensuring high quality education, health and social care**
 - Ensure that all Lewisham residents benefit from access to high quality education, health and social care by protecting and planning for facilities to meet local needs and working with stakeholders, including the NHS, to support innovative approaches to delivering services.

What is the Plan not seeking to achieve?

- 2.4.3 There is a need to be clear that the Local Plan will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they can be addressed at subsequent stages of the planning process, including at the planning application stage. The scope of the Local Plan is reflected in the scope of the SA.

3 What is the IIA scope?

3.1 Introduction

- 3.1.1 The IIA scope refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan.
- 3.1.2 The aim here is to introduce the reader to the *broad scope* of the IIA. **Appendix II** presents further information; however, it is not possible to define the scope of the IIA comprehensively. Rather, there is a need for the IIA scope to be flexible, responding to the emerging plan and the latest evidence base.

3.2 Consultation on the scope

- 3.2.1 The Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the IIA Report], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.³ As such, these authorities were consulted on the IIA scope in 2015 (N.B. at this stage the intention was to progress an SA process, as opposed to an IIA process).
- 3.2.2 In 2019 the decision was taken to revisit the IIA scope to reflect significant changes to policy context and understanding of key issues and evidence since the time of the scoping consultation. There was then the ability for consultees to comment on the IIA scope in 2020, at the time of the draft plan consultation, and comments were received from the Environment Agency – see discussion in Appendix II.

3.3 The IIA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the IIA framework established in 2019, and which builds upon the IIA framework established through dedicated scoping work, including consultation, in 2015. This framework is *as per* that previously presented in the 2021 Interim IIA Report.

Table 3.1: The IIA framework

Topic		Objective
Air quality and pollution		Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.
Biodiversity and green infrastructure		Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.
Climate change adaptation		Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.
Climate change mitigation		Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).
Communities	Accessibility	Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.
	Housing	Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.
	Wider issues	Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.

³ In-line with Article 6(3) of the SEA Directive, these bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.*’

Topic	Objective
Economy	Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.
Historic environment, heritage, character and culture	Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.
Land and natural resources	Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.
Transport	Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.

Integrating Equalities Impact Assessment

- 3.3.2 The Equality Act 2010 (the Act) introduced a Public Sector Equality Duty. It covers the following protected characteristics: age, disability, gender re-assignment, marriage / civil partnership, pregnancy, maternity, race (including nationality and ethnicity), religion or belief, sex (male/female) and sexual orientation.
- 3.3.3 Under the Duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.
- 3.3.4 Equalities issues and impacts are considered under all of the IIA framework topic headings presented within Table 3.1, and a stand-alone discussion (integrated with health considerations) is presented under the "Communities (Wider issues)" heading. A further stand-alone discussion – giving consideration to each of the protected characteristics covered by the Act – is also presented in **Appendix III**.
- 3.3.5 However, it is inherently challenging to identify a cause-effect relationship between Local Plan interventions on one hand and equalities issues on the other, given uncertainty regarding the 'on the ground' implications of strategic interventions and uncertainty in respect of how equalities issues vary spatially. In many cases there is a lack of evidence to show how groups with protected characteristic groups are geographically spread/concentrated, or to show that groups have a particular association with one or more of the types of land use being addressed through the Local Plan.
- 3.3.6 It follows that many equalities issues are more appropriately considered at the development management stage, when detailed decisions are made on matters including masterplanning and design, and evidence-gathering can be undertaken to understand the specific local issues and opportunities that exist.
- 3.3.7 One important step that can be taken through the Local Plan is to focus efforts on addressing areas and smaller pockets of relative deprivation, which can be identified using readily available data sources. This approach reflects an understanding that there is a strong link between relative deprivation and equality of opportunity for groups with protected characteristics under the Equalities Act 2010.

Integrating Health Impact Assessment

- 3.3.8 As with EqIA, health issues and impacts are discussed under all of the IIA framework topic headings presented within Table 3.1 as appropriate, and a stand-alone discussion (integrated with equalities considerations) is presented under the "Communities (Wider issues)" heading.

Habitats Regulations Assessment (HRA)

- 3.3.9 Finally, please note that a stand-alone process of Habitats Regulations Assessment (HRA) is being undertaken alongside preparation of the plan. An HRA Report is published as part of the current consultation, in addition to this IIA Report.

Part 1: What has plan-making / IIA involved up to this stage?

4 Introduction to Part 1

- 4.1.1 The aim here is to introduce the information set out in this part of the report, i.e. provided in order to answer the question: *What has plan-making / IIA involved up to this stage?*

4.2 Overview

- 4.2.1 Plan-making has been underway since 2015; however, the focus here, within Part 1, is not to relay the entire 'story' of plan-making to date, but rather the work undertaken to examine **reasonable alternatives** in 2022 (aligning closely with work completed in 2019 and 2020, as discussed further below).

- 4.2.2 Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Chapter 5**
- present an assessment of the reasonable alternatives - see **Chapter 6**
- explain the Council's reasons for supporting the preferred approach - see **Chapter 7**

- 4.2.3 Presenting this information is in accordance with the regulatory requirement to present an assessment of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'.

Reasonable alternatives in relation to what?

- 4.2.4 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives of the plan,⁴ which are introduced above, within Section 2.4. Following a review of these objectives, ahead of the Draft Plan consultation (2020), it was determined appropriate to focus on **spatial strategy**, i.e. the approach to site allocation, including supported density / yield at specific sites. Establishing a spatial strategy is clearly something of an overarching objective of the Local Plan.⁵ The decision was made to refer to the spatial strategy alternatives as **growth scenarios**, and an assessment of growth scenarios was a focus of the Interim SA Report (2020). No concerns were raised with this approach, and so in 2022 the decision was taken to focus attention on reasonable alternative growth scenarios once again.

- 4.2.5 Additionally, Appendix IV of the Interim SA Report (2020) explored RAs for ten development management (**DM**) policy areas. This work has been revisited since the Draft Plan / ISA Report - see **Appendix IV**.

Whose responsibility?

- 4.2.6 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (LB Lewisham), with AECOM acting in an advisory capacity; assessing the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.2.7 Comments are welcomed on:

- the decision to focus on growth scenarios (first-and-foremost) and select DM policy alternatives;
- the reasonable growth scenarios selected, with reference to the selection process (Section 5);
- assessment findings in respect of the growth scenarios (Section 6);
- the Council's reasons for supporting the preferred option (Section 7); and
- work undertaken in respect of DM policy alternatives (Appendix IV).

⁴ Regulation 12(2) requires that reasonable alternatives are defined in light of "the objectives and geographical scope of the plan".

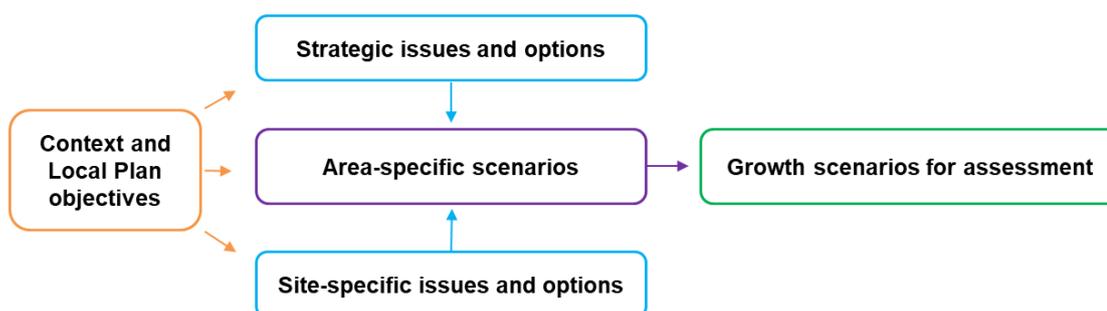
⁵ It was also considered appropriate to focus on 'spatial strategy' given the potential to define alternatives that are meaningfully different, in that they will vary in respect of 'significant effects', in terms of the IIA framework. National Planning Practice Guidance is clear that IIA "should only focus on what is needed to assess the likely significant effects of the plan". More broadly, spatial strategy has implications for all or most Local Plan objectives and, correspondingly, generates a high degree of interest.

5 Defining growth scenarios

5.1 Overview

- 5.1.1 The legal requirement is to explore reasonable alternatives “*taking account of the objectives and geographical scope of the plan*”. From this starting point, and also from the starting point of the evidence base and understanding generated over the course of the plan-making process stretching back to 2015, the Council and AECOM went through a process of exploring strategic issues/options alongside issues/options associated with specific sites and areas within the Borough, before drawing upon this understanding to arrive at reasonable growth scenarios. Figure 5.1 summarises the process.

Figure 5.1: Selecting reasonable growth scenarios



When was this work undertaken?

- 5.1.2 A considerable amount of work, in respect of defining / selecting reasonable growth scenarios for assessment and consultation, was undertaken in 2020, as reported in Section 5 of the Interim IIA Report (2020). Limited comments were then received on the growth scenarios work through the draft plan / Interim IIA Report consultation. Subsequent to the consultation, the Council and AECOM were open to the possibility of making significant adjustments to the reasonable growth scenarios; however, on balance, the conclusion was reached that the reasonable growth scenarios at the current time remain broadly as per those previously appraised and published for consultation in 2020. As such, there is strong consistency between the information presented below and the equivalent information presented in Section 5 of the Interim SA Report (2020). However, the whole section has been refreshed and updated.
- 5.1.3 In summary, the reasonable growth scenarios defined, appraised and consulted upon in 2019/20: A) reflected three Bakerloo Line Extension (BLE) scenarios; and B) under each BLE scenario, explored two growth scenarios. It was considered reasonable to take a similar approach in 2022, mindful of the following comment received from the GLA through the Draft Plan consultation: “*As set out in detail in the consultation response by TfL, there is concern about the lack of a clear and consistent differentiation between the upfront Preferred Approach in the draft Plan, which does ‘align’ with a scenario without the BLE being delivered, and scenarios supporting the BLE in other parts of the draft Plan and its evidence.*”

Structure of this section

- 5.1.4 This section firstly covers: A) ‘top down’ analysis of strategic issues and options with a bearing on the selection of reasonable growth scenarios; and B) ‘bottom up’ analysis of the pool of sites that might feature as allocations within the reasonable growth scenarios.
- 5.1.5 The next step is then analysis of individual sub-areas within the Borough, drawing upon the preceding strategic and site-specific analysis, with the aim of reaching a conclusion, for each sub-area, on whether a single growth scenario emerges that is firmly evidenced, or there is a need to examine alternatives.
- 5.1.6 The final section then draws matters together to define Borough-wide reasonable growth scenarios for assessment (Section 6) and consultation.

5.2 Strategic issues and options

5.2.1 The first step in the process involved the consideration of strategic issues/options in terms of:

- Quantum – how many additional new homes should the Local Plan provide for?
- Distribution – which broad areas within the Borough are more suited and less suited to growth?

Quantum

5.2.2 The London Plan (2021) sets a target of **1,667 homes** per annum for the period 2019/2020 to 2028/2029.

5.2.3 There is also a need to give consideration to Local Housing Needs (LHN) following application of the Government's standard methodology, which considers demographic projections and an adjustment for affordability. As set out in the Lewisham Strategic Housing Market Assessment (SHMA, 2022), LHN is 3,336 homes 'uncapped' or **2,334 homes** if capped at 40% above the 1,667 target in London Plan. The GLA consultation response received in 2020 set out that it is "unnecessary and confusing" to include reference to LHN within the plan document itself; however, from a perspective of defining reasonable growth scenario for assessment and consultation, it is considered important to raise the matter.

5.2.4 These figures provide a starting point, when considering the level at which to set the housing requirement (which is the number of homes committed to for monitoring and evaluation purposes, including calculation of a five year housing land supply, and measurement of performance against the Housing Delivery Test).

5.2.5 There are two further considerations:

- Affordable housing need – the Government's Planning Practice Guidance (PPG) states: "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*" Affordable housing needs in Lewisham are considered to be quite acute, with the SHMA identifying a need for 2,818 affordable dwellings per year.

However, the Local Plan does not need to meet this in full, as PPG says: "*... the total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, taking into account the probable percentage of affordable housing to be delivered by eligible market housing led developments*".

Also, calculating a figure at which affordable housing needs would be met in full is fraught with difficulty, including as there is a need to consider the implications of households leaving the private rented sector (PRS) to access newly available affordable housing (thereby driving down prices in the PRS, leading to landlords selling PRS properties, leading to downward pressure on the price of market housing locally).

- The London Plan target – only applies up to 2028/2029, but the NPPF is clear on the need to plan for at least a 15 year plan period. As such, there is a need for Local Plans for London Boroughs to give consideration to the approach to supporting growth beyond 2028/29.

Paragraph 4.1.11 of the London Plan states: "*If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the [2017 SHLAA](#) findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.*" However, the risk is that this approach could lead to an unduly low growth strategy, with [Table 10.2](#) of the 2017 SHLAA identifying just 4,710 homes supply from large sites in phase 4 (2029/30 to 2033/34) and phase 5 (2034/5 to 2040/41).

Another option is to simply roll forward the 1,667 figure for the latter years of the plan period (2020/2021 – 2029/2035). The GLA recently raised a concern with this approach in the case of the Enfield Local Plan (see the second paragraph of page 4 [here](#)); however, the GLA supported this approach through the Lewisham Draft Plan consultation (2020), stating: "*The Mayor welcomes the borough's intention to meet its London Plan housing target of 1,667 units/year. For the 15-year Plan period it has identified Site Allocations delivering 25,000 units. Over 27,000 units could be achieved, if sites in Bell Green/ Lower Sydenham supported by Phase 2 of the Bakerloo Line Extension [BLE] are included.*"

Also, this approach was recently supported in the cases of the Westminster Local Plan (see paras 56 and 58 [here](#)) and Havering Local Plan (see paras 60 and 63 [here](#)).

5.2.6 In **conclusion**, it is reasonable to focus attention on growth scenarios that would enable the housing requirement to be set at 1,667 homes per annum over the entirety of the plan period (N.B. there is also a need to consider a 'supply buffer' over-and-above the housing requirement, to ensure the requirement is delivered in practice, given the inevitability of unforeseen delivery issues). Additionally, there is a need to consider the possibility of setting the housing requirement at a higher figure, mindful of LHN and affordable housing needs. However, it is clear that higher growth scenarios are only 'reasonable' where there is confidence regarding additional delivery of infrastructure capacity which, for Lewisham, means the BLE, which is supported by the London Plan. It seems likely that the GLA would not support higher growth in the absence of the BLE. The following quotes from recent Inspectors Reports are also of note:

- Westminster (paragraph 56): *“Fundamentally, the [PPG] makes it clear that local planning authorities should use the local housing need figure in the spatial development strategy and should not seek to revisit their local housing need figure when preparing new strategic or non-strategic policies.”*
- Havering (paragraph 60): *“I have considered whether [housing need] should be the housing requirement in the Plan. However, the LP2021 makes clear that London should be considered as a single housing market area and that boroughs are not required to carry out their own housing needs assessment. The approach of the Plan as modified to seek to meet the LP2021 housing target is therefore sound.”*

Broad distribution

5.2.7 This is the second of two sections examining 'strategic issues and options' with a bearing on the selection of reasonable growth scenarios. A discussion is presented under the following headings:

- Supporting opportunity areas
- Supporting regeneration areas
- Supporting town and district centres
- Focusing on transport corridors
- Delivering strategic infrastructure
- Exploring density / building heights
- Reflecting changing employment needs
- Respecting and enhancing local character
- Respecting and enhancing the local environment

Supporting opportunity areas

5.2.8 The London Plan identifies two Opportunity Areas within Lewisham that have significant potential to accommodate growth in homes and jobs and where neighbourhoods, businesses and residents stand to benefit from focused regeneration and urban renewal. The Opportunity Areas are: the New Cross / Lewisham / Catford corridor; and Deptford Creek / Greenwich Riverside.

5.2.9 In recent years there has been a significant amount of investment in these areas, and a number of strategic development sites have now been delivered or have been granted planning consent, alongside new strategic infrastructure. It follows that the potential to identify further development capacity in these areas, in order to contribute to the required step-change in housing delivery discussed above, is limited.

5.2.10 Finally, the Council considers that there may be an opportunity to designate a new Opportunity Area at Bell Green and Lower Sydenham. This area currently exhibits some of the highest levels of deprivation locally and suffers from low levels of public transport accessibility; however, it also features a number of large sites offering significant development potential if brought forward in a coordinated way, and supported by strategic transport and other infrastructure.

Supporting regeneration areas

5.2.11 It is vitally important that everyone is able to enjoy a good quality of life in Lewisham irrespective of their background, age or ability. In particular, there is a need to ensure that local residents and others are able to benefit from good access to high quality and genuinely affordable housing, education and training, and job opportunities, as well as a wide range of community facilities, such as parks and health services.

- 5.2.12 On this basis, there is a need to direct new investment to the south and southeast of the Borough, where there is widespread need for regeneration. A partnership approach must be pursued in order to ensure coordination of public and private sector investment in collaboration with local communities.
- 5.2.13 A related consideration is the need to ensure that existing dwellings are brought up to good standard, including within Lewisham's housing estates. As well as meeting housing needs, this is important from a perspective of improving living environments and ensuring integrated, safe and healthy communities.
- 5.2.14 The Decent Homes programme provides one mechanism for housing improvement and has been successfully delivered recently.⁶ However, for large scale regeneration schemes funding is limited and this type of investment may not always be feasible or viable for some houses or estates.⁷

Supporting town and district centres

- 5.2.15 There is a need to promote a vibrant and diverse multi-centred Borough by directing new residential, commercial, community, leisure and cultural development to Lewisham's town and local centres in order to support their vitality and long-term resilience. Specifically, there is a need to:
- enable Lewisham town centre to cement its position as a centre of sub-regional significance and achieve metropolitan centre status;⁸
 - facilitate the comprehensive regeneration of Catford major town centre to reinforce its role as the principal civic and cultural hub within the Borough; and
 - ensure the district town centres at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham retain their distinctive features whilst evolving in their function as key hubs.
- 5.2.16 These are locations that already benefit from higher levels of public transport accessibility and transport interchanges along with a core of services and community facilities. Furthermore, there are opportunities to secure the long-term viability of these centres through the introduction of a wider range of uses, including housing, workspace and community facilities, potentially alongside a reduced retail focus.
- 5.2.17 There is also a need to consider the three out-of-town retail parks at Bell Green, Bromley Road and Southend. Lewisham's Retail Capacity Study Update (2019) identifies that retail capacity can be accommodated within the town centre network, and forecasts a reduction in the need for out-of-town retail.

Focusing on transport corridors

- 5.2.18 The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor is largely centred on the A21 (Lewisham High Street, Bromley Road).
- 5.2.19 Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary, including the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon).
- 5.2.20 At present these strategic roads prioritise vehicular flows, or their 'link' function, above any 'place' function, and can appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development serves to develop more of a place function, including with safe space for pedestrians and cyclists in line with Healthy Streets principles.
- 5.2.21 An A21 Development Framework was approved by Mayor and Cabinet 9 March 2022, and is available [here](#). It is drawn upon extensively within Section 5.4 and the subsequent assessment sections.

⁶ The proportion of residential units meeting the Decent Homes standard increased from 41% to 94% between 2007 and 2017.

⁷ Housing estates have been developed in the Borough over many decades. Their age and condition varies and therefore so too does the programme of maintenance required for each. The layout and design of some older estates constrain opportunities for improvements, whilst other estates may be associated with options to deliver more affordable housing and improved living environments, either through incremental infill or comprehensive redevelopment. All strategic estate renewal and regeneration schemes will be carried out in consultation with existing residents and the local community, in line with the London Mayor's Good Practice Guide to Estate Regeneration (2016) and the Council's adopted Statement of Community Involvement.

⁸ The London Plan indicates that Lewisham major centre has the potential to be designated as a metropolitan centre in the future. This is owing to its growing influence as a transport interchange, commercial centre and community hub.

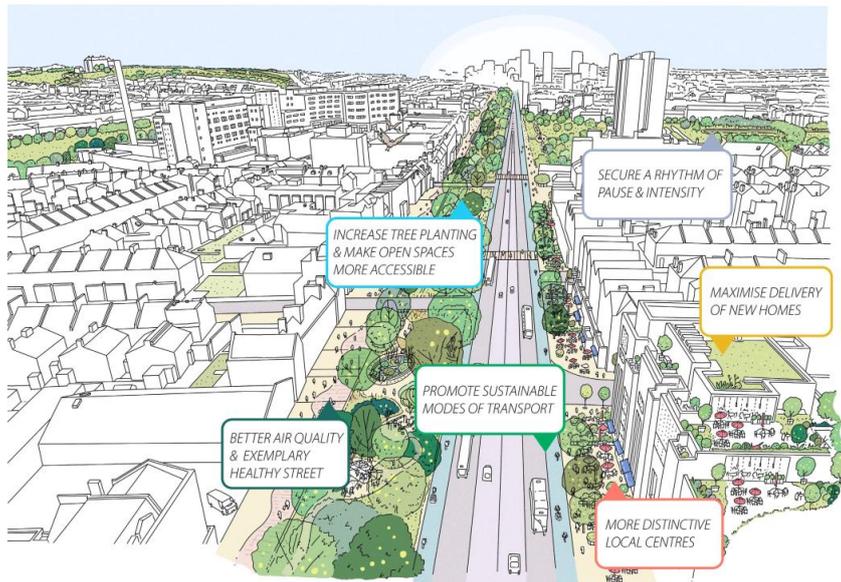
Figure 5.2: The A21 Framework Area, also showing potential development sites



The A21 Development Framework Study Area

- Study area boundary
- Potential development sites

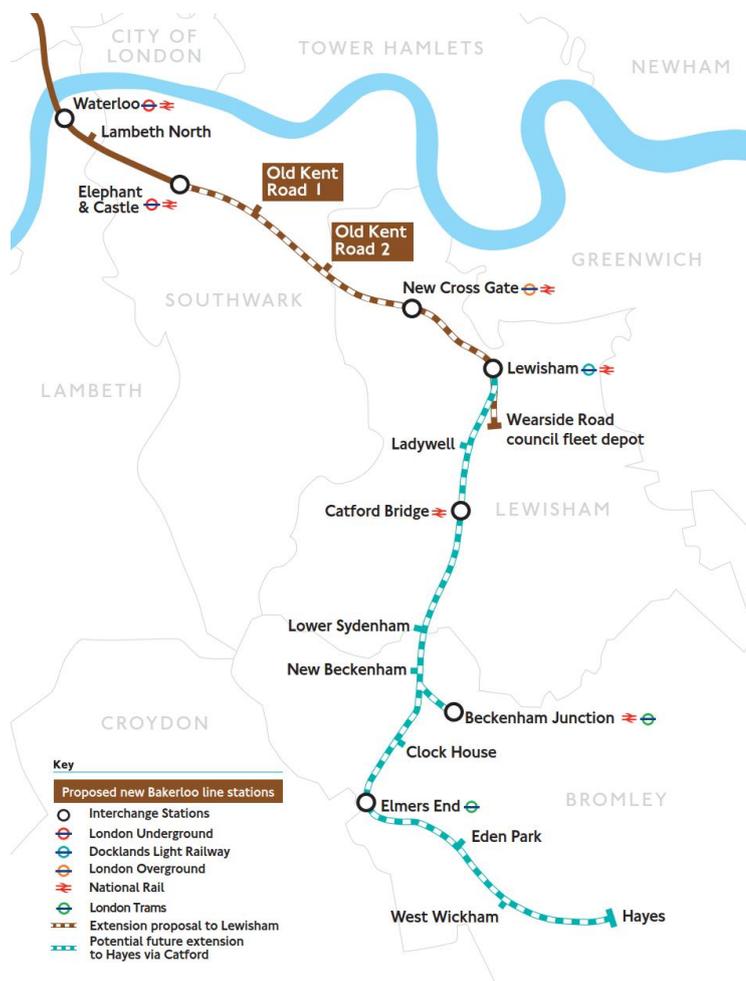
Figure 5.3: A vision for part of the A21 corridor



Delivering strategic infrastructure

- 5.2.22 There are strategic opportunities in respect of facilitating new and improved community and strategic transport infrastructure, particularly in the London Plan Opportunity Areas and Lewisham’s southern areas, where interventions and transformational change can positively address inequalities and local deprivation.
- 5.2.23 Of key significance is the Bakerloo Line extension, which is supported by the London Plan. It is proposed that the line is extended from Elephant and Castle to Lewisham via New Cross Gate. This would enable a further extension beyond Lewisham town centre, potentially bringing the Bakerloo Line to Hayes over the long-term, with stations at Ladywell, Catford Bridge and Lower Sydenham.
- 5.2.24 A Bakerloo Line Local Economic Impact Assessment was completed in 2020, focusing on impacts within a 1km key zone of influence. It includes a focus on the improvement that would likely be made to the Healthy Streets (HS) score in the vicinity of each of the new BLE stations (north to south):
 - New Cross Gate – has a middling HS score of 51; there will be opportunities to improve this score, but significant improvement is dependent on surrounding development sites.
 - Lewisham – has a relatively high score of 60, and this could increase to 70
 - Ladywell – has a middling HS score of 51; the impact of a BLE station would be more limited, given the constrained nature of the station site, but the HS score could increase to beyond 60.
 - Catford – has a lower HS score of 49, largely due to the problematic South Circular; an upgraded Catford Bridge station could assist with increasing the score to at least 65, with an improved interchange (Catford Station and busses), better use of the river and improved connection to the Broadway and town centre.
 - Lower Sydenham – has a low HS score of 42; the Study finds that a BLE station would lead to a transformational change and a dramatic rise in the Healthy Streets score to approximately 65.

Figure 5.4: The proposed route of BLE Phases 1 and 2⁹

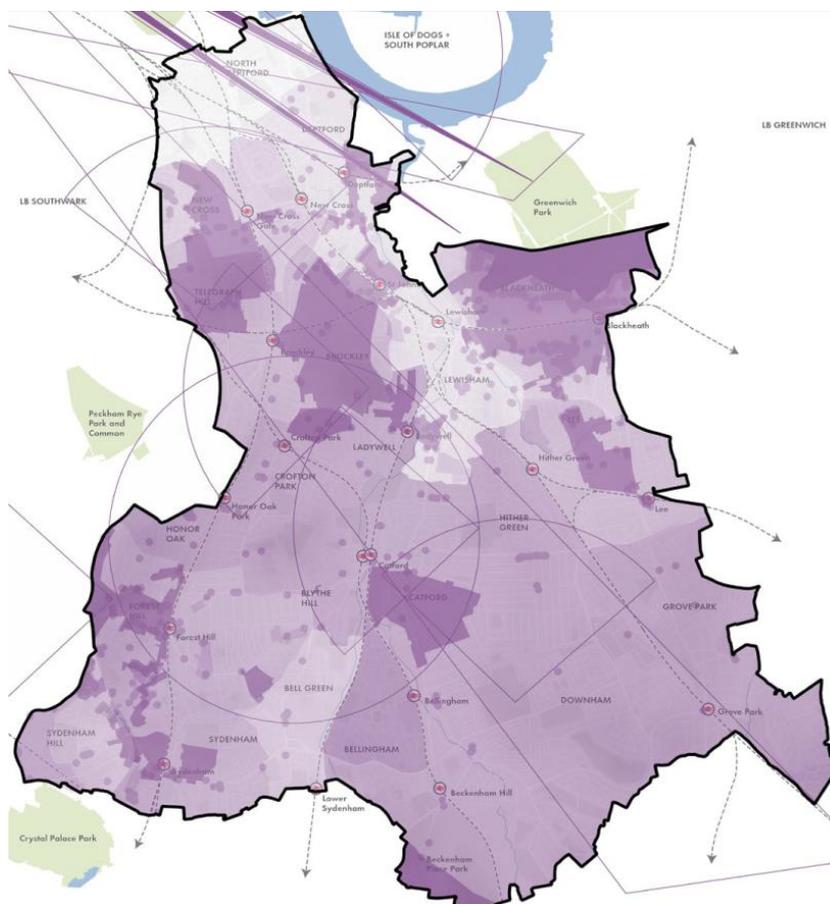


⁹ See <https://consultations.tfl.gov.uk/tube/c5ee9ab6/>

Exploring density

- 5.2.25 Making the best use of land will help to ensure a critical mass of residents and businesses to generate and support investment, such as for community facilities and public realm enhancements. This includes high density mixed-use development in appropriate locations.
- 5.2.26 These locations are principally Lewisham's Opportunity Areas and town centres along with the strategic corridors for movement that connect these places. A Tall Buildings Study (2019) served to inform the identification of locations considered suitable for tall buildings in the Draft Local Plan, and a Tall Buildings Study Addendum was then published for consultation in May 2022.
- 5.2.27 A related matter is the development of smaller sites throughout the Borough, including to achieve the sensitive intensification of lower density suburban areas. Such schemes - including backland sites, infill sites and extensions - will be important to meeting future housing needs, but there is limited availability and these sites are often constrained, e.g. by irregular plot forms and access issues. It is in light of these challenges that the London Plan Examination Panel Recommendations (2019) reduced the Borough's small sites target from 829 dpa to 379 dpa (the figure then included in the final London Plan, 2021). A small sites SPD was recently adopted, see: <https://lewishamsmallsites.co.uk/>.

Figure 5.5: Tall building sensitivity (from the Tall Buildings Study, 2019)



Reflecting changing employment needs

- 5.2.28 It is helpful to recap the final London Plan position on industrial land, including Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as set out in [Policy E7](#): Industrial intensification, co-location and substitution. The supporting text explains:

“In collaboration with the Mayor, all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses... There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses...”

5.2.29 The Policy itself more specifically explains:

“Development Plans... should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation... or as part of a co-ordinated masterplanning process... In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered.

5.2.30 There are strong precedents for successfully achieving co-location of light industry with homes and offices, and this approach can be seen to reflect shifts in modern commercial practices (e.g. traditional office sectors can increasingly use ‘hybrid’ space in industrial premises). However, there can also be challenges (see discussion of reasonable alternatives in Appendix IV). Box 5.1 introduced the Borough’s SIL.

5.2.31 A related priority is to address the shortage of low-cost and affordable workspace, which is identified as a significant issue by Lewisham’s Employment Land Study (2019) and Local Economic Assessment (2019). In Lewisham it has a key local role in supporting the cultural, creative and digital industries. Low-cost workspace has typically been scattered across town centres and areas such as New Cross and Deptford, and clusters are also present along the East London Line (Overground) corridor.

Box 5.1: Strategic Industrial Land (SIL) in Lewisham

Lewisham contains two designated SILs at Surrey Canal Road, in the north, and Bromley Road, in the south. Lewisham’s SILs make up a significant proportion of the Borough’s industrial capacity and are key areas for business activity and local jobs. Lewisham lost 33% of its total industrial land between 2001-2015, and neighbouring Southwark lost 28% of total industrial land between 2001-2015.

The London Plan requires boroughs to proactively manage and sustain SILs, and the two Lewisham SILs are well-positioned to play a more integral role in supporting the London CAZ, which is a driver of the regional economy. This includes industrial capacity for logistics and last mile distribution and ‘just-in-time servicing’.

Surrey Canal Road SIL is the largest of the two Lewisham SILs, and links most closely to the CAZ. It covers 28.7 ha of employment uses. The area accommodates 560 businesses and over 4000 jobs. The New Cross Area Framework and Lewisham Employment Land Study (2019) identify opportunities to consolidate and intensify employment uses at Surrey Canal Road SIL, and the Draft Plan (2020) proposed three allocations within the SIL where there would be support for colocation of existing industrial and new non-industrial uses.

The figures below, from the Area Framework, show: the SIL in context; the key challenges to be addressed; and the proposed strategy. The strategy is summarised as follows:

Safeguard substantial SIL designation whilst exploring options for consolidation, intensification and co-location, which supports creative activity and includes affordable workspace.

- Promote and support creative uses within the northern employment areas by seeking opportunities for low cost/low threshold workspaces for small businesses in vacant spaces.
- Ensure any relocation of existing businesses occurs within local area.
- Promote the distinctive creative and industrial identity of Surrey Canal Road through effective placemaking interventions which ensure the employment areas act as better neighbours to their surroundings.
- Better connect local neighbourhoods and employment areas by creating healthier environments for pedestrians and cyclists, whilst mitigating the impact of industrial traffic. This includes the reconfiguration of Cold Blow Lane to enhance the safety of pedestrians and cyclists.
- Identify potential heritage assets or features which contribute to local character which have potential to inform the design of new development.

The new proposal, discussed further below, is to de-designate three parts of the SIL – namely the three sites proposed for allocation in the Draft Plan – and to redesignate these sites as LSIS, so as to allow flexibility for colocation. In turn, there is a need to allocate a new site – Bemondsey Dive-under – as replacement SIL.

Figure 5.6: Surrey Canal Road SIL in context

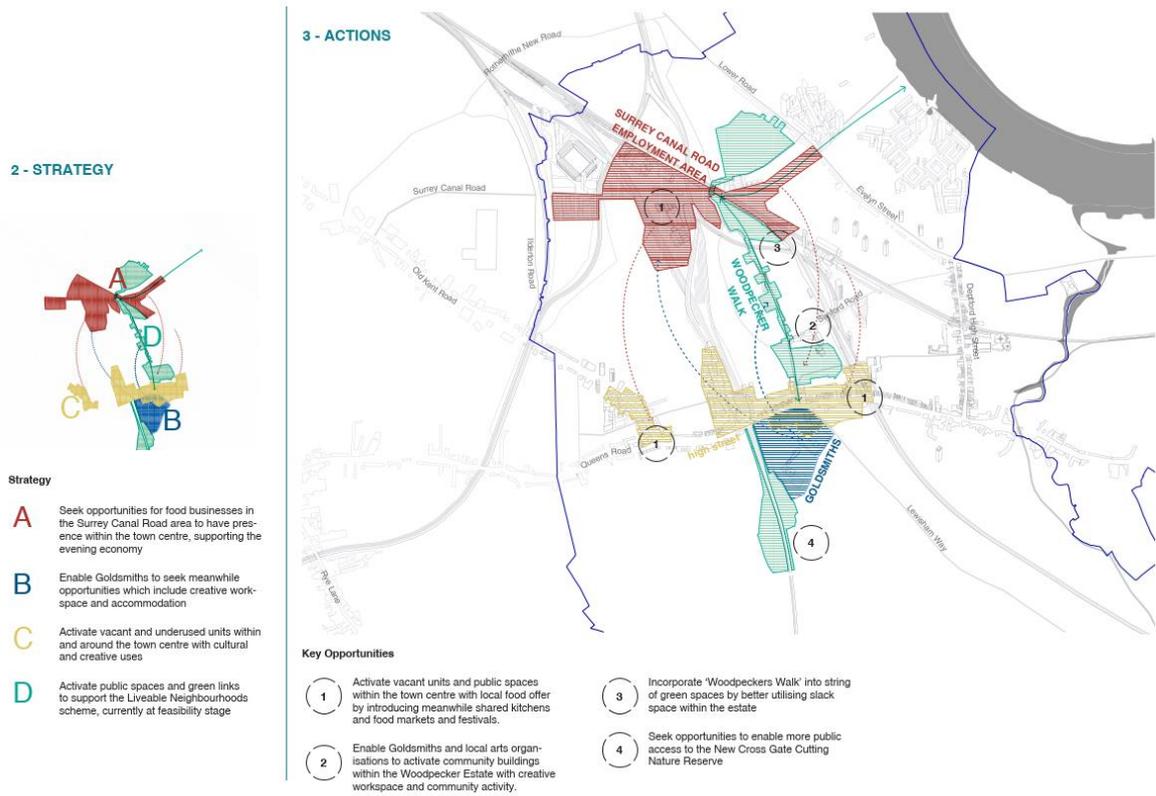


Figure 5.7: Challenges at Surrey Canal Road SIL

Challenges



1 - Blank frontages on Surrey Canal Road



2 - Waste management adjacent to residential



3 - Employment area is low density and at capacity



4 - Poor quality environment of waste management uses

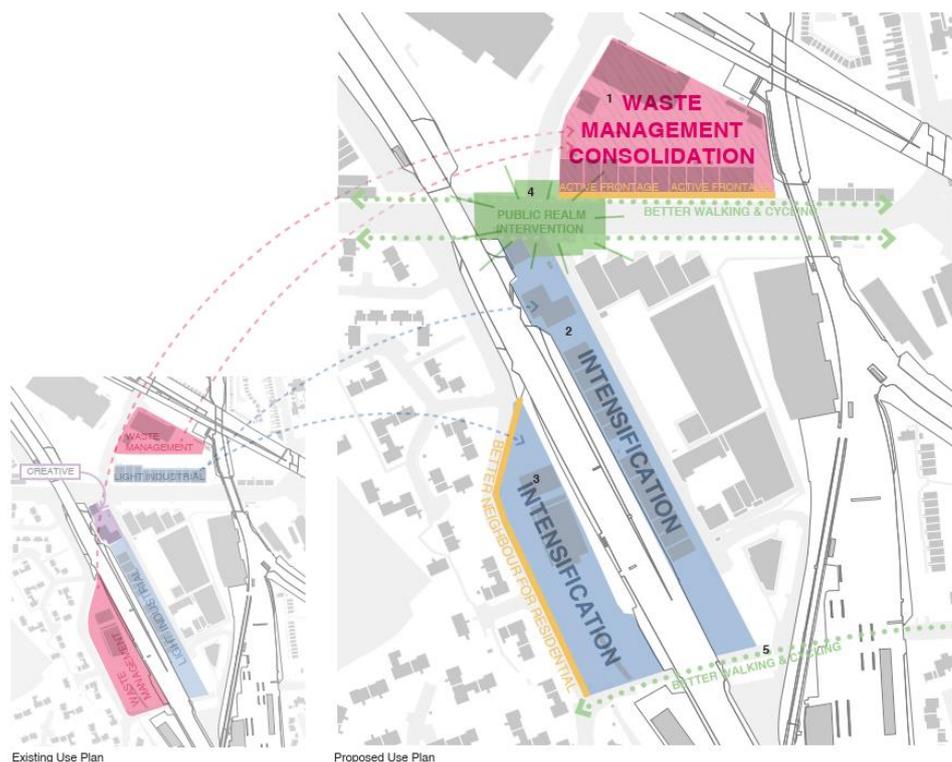


5 - Large volumes of HGV traffic



6 - Blank walls surrounding waste management

Figure 5.8: The New Cross Area Framework proposed strategy for Surrey Canal Road SIL



Respecting and enhancing local character

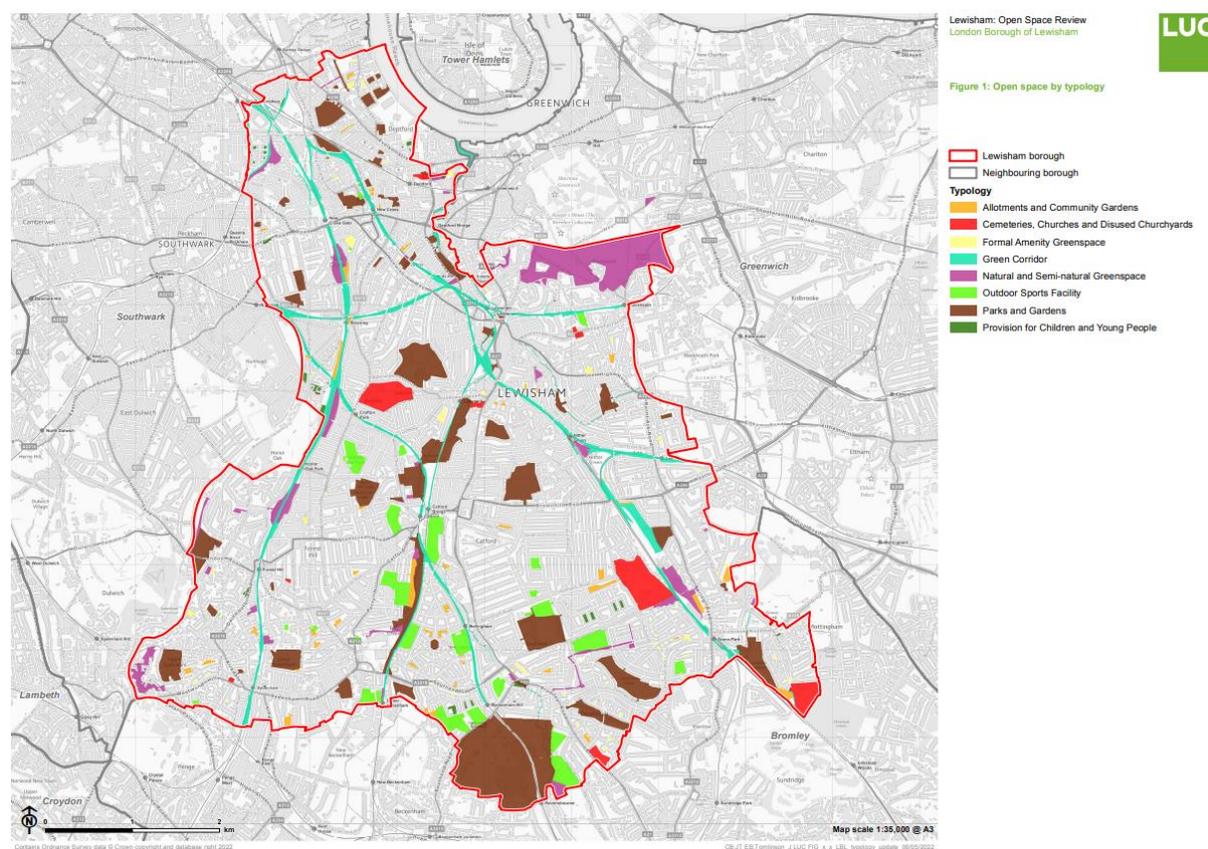
- 5.2.32 Lewisham comprises many neighbourhoods and places, all of which have distinctive features. The historic, cultural, natural and built environment contributes significantly to shaping local character. It also influences how people experience the Borough and informs their sense of place and identity. There is, therefore, a need to support integrated place making, which necessitates development delivered through a design-led process based on an understanding of site context. A Characterisation Study (2019) has been prepared in collaboration with the local community and sets out key defining features of the Borough.
- 5.2.33 A related consideration is the portfolio of strategic views in the Borough, including London Strategic Views and Lewisham Local Views, which help to define the character of London and contribute to local distinctiveness. These strategic views, including their Protected Vistas, must be designated and positively managed in line with the London Plan and associated London View Management Framework.
- 5.2.34 A further related consideration is the recent clustering of Houses in Multiple Occupation (HMOs) in Lewisham's southern wards, which has led the Council to implement an Article 4 Direction to remove the Permitted Development rights for the conversion of dwellings into small HMOs within certain wards. There are wide-ranging issues associated with HMOs, including in respect of meeting housing needs; however, a stand-out concern relates to impacts to local character and amenity, e.g. due to parking and bins.

Respecting and enhancing the local environment

- 5.2.35 There is a need to protect and enhance the local network of green infrastructure, open spaces, the water environment and biodiversity, noting that Lewisham is strongly associated with the valley of the River Ravensbourne (also its tributaries the Quaggy and Pool). A value figure of £2.1 billion has recently been assigned to Lewisham's green infrastructure (Open Spaces Assessment, 2019), which helps to put into perspective the importance of protection and enhancement, and further context is provided by the draft London Plan objective to make London 50% green by 2050, in line with London's National Park City status.
- 5.2.36 Open spaces form a vital component of Lewisham's green infrastructure. Lewisham benefits from a wide range of good quality open spaces, which total around one-fifth of the area of the Borough; however, as the Borough's population increases the pressure on open spaces will rise. The Lewisham Open Spaces Assessment (2019) found that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term; however, there will be limited opportunities to create new open space. It is therefore vitally important that open spaces are protected, measures are taken to improve their functional quality, and that public access to open space is enhanced.

5.2.37 An Open Spaces Review was recently published for consultation, including the figure below.

Figure 5.9: Open space by typology



5.2.38 Also, and importantly, the spatial strategy must serve to minimise per capita greenhouse gas emissions and ensure the Borough is resilient to the consequences of climate change. There is a need to support modal shift away from use of the private car, in light of the London Plan target for 80% of all journeys in London to be made by non-car modes by 2041, including by supporting a more compact urban structure with a well-linked network of places and finer grained integration of land uses. Delivering economies of scale and the conglomeration of uses necessary to enable heat networks is another clear opportunity.

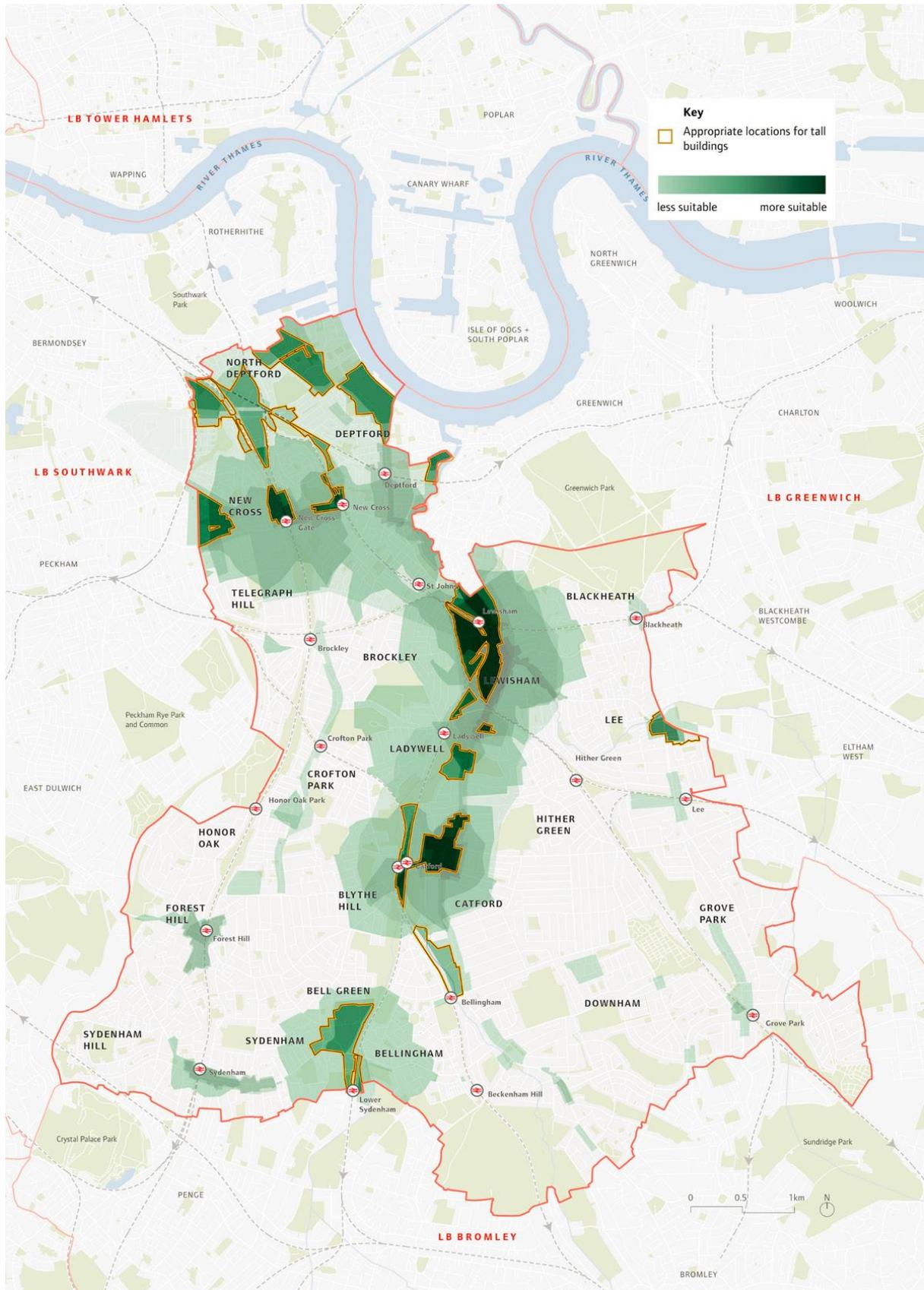
5.2.39 In respect of access to public transport, this varies across the Borough. New Cross, Deptford, Lewisham and Catford generally well served, including by stations with frequent services on the Docklands Light Railway (DLR), National Rail and London Overground networks; however, other parts of the Borough do not benefit from the same level of provision and connectivity. Furthermore, bus and rail orbital routes are somewhat limited, making radial movements typically faster than orbital trips. The main orbital road links, such as the South Circular Road, contribute to orbital trips being more attractive by car. Lewisham's southern areas currently have the highest levels of dependency on car use.

5.2.40 Finally, there is a need to consider the six designated air quality management areas (AQMAs), which cover all of the Borough north of the A205 (South Circular) together with major roads in the south. In addition to AQMAs, there are also ten air quality focus areas (AQFAs) in the Borough.

Conclusion on broad distribution issues and options

5.2.41 The discussion above has served to highlight a wide range of broad distribution issues and options that must feed into work to establish reasonable growth scenarios. A wide range of mapped information is presented within the Local Plan itself to support the discussion above; however, for the purposes of this report there is a particular need to highlight the outcome of the Tall Building Study Addendum (2022) – see Figure 5.10.

Figure 5.10: Tall buildings suitability



5.3 Site specific issues and options

5.3.1 Having considered strategic (or ‘top down’) issues and options with a bearing on the establishment of reasonable growth scenarios, the next step was to explore site specific (‘bottom up’) options, i.e. options in respect of the pool of sites that are available and potentially in contention for allocation.

5.3.2 Specifically, this section considers:

- Sifting site options leading to the identification of sites for allocation;
- exploring use mix options at specific sites; and
- exploring density options at specific sites (a function of factors including heights/massing and use mix).

Identifying sites for allocation

5.3.3 Work on identifying sites for allocation was primarily undertaken prior to the Draft Plan consultation (2020), as reported in the Interim SA Report (2020).

5.3.4 Firstly, an initial list of site options was identified from various sources, including:

- the London Strategic Housing Land Availability Assessment (SHLAA) – this exercise, led by the GLA, identified potential development sites across London (and informed the Borough’s housing target);
- ‘calls for sites’ – two calls for sites, prior to the Regulation 18 consultation, invited the public (including landowners and developers) to submit sites for consideration in the new Local Plan;
- existing site allocations – i.e. allocations in the adopted Local Plan but have not been fully delivered;
- development pipeline – a number of consented major schemes were identified that require an allocation, in order to provide certainty over the future use of land;
- pre-application sites – these are sites at the advanced stage in the pre-application process, to the extent that they can be considered part of the ‘development pipeline’; and
- other sites – identified by the planning policy team through the technical evidence base, site investigations and in liaison with internal and external stakeholders.

5.3.5 All identified site options were then subject to a sifting exercise, as part of which officers assessed sites against criteria to establish whether they were suitable for allocation – see Table 5.1.

5.3.6 In total, at the time of the Draft Plan consultation (2020), 81 out of a total pool of 378 sites were identified as suitable for allocation by the Council following application of this criteria-based methodology. Detailed reasons for progressing / excluding sites were presented within a Site Allocations Background Paper, at the time of the Regulation 18 consultation (and that paper has now been updated).

5.3.7 The latest situation (2022) is as follows:

- Seven sites have dropped out for quite clear cut reasons, namely: four sites have now been completed; one site is unavailable (McDonalds Ashgrove Road); one site has recently gained consent for an employment use (Travis Perkins and Citroen Garage); and Riverside Youth Club and 2000 Community Centre now has planning permission for redevelopment as a youth centre with sports facilities.
- A further three sites are no longer considered suitable for allocation for reasons that are perhaps less clear cut (i.e. reasons that relate more to a policy choice), namely: Molesworth Street LSIS Car Park (needed as a flood storage site); Land at Bromley Road and Randlesdown Road SIL (mixed use development is not deemed suitable or deliverable on this SIL land, without compensatory SIL being provided elsewhere, in line with the London Plan); and Havelock House, Telecom Site and Willow Tree House (following objections raised relating to the loss of green infrastructure). These three ‘omission sites’ are discussed further as part of the ‘whole plan’ assessment in Section 9.
- Four new sites are identified as suitable for allocation, although in two cases (Thurston Road Bus Station and South Circular) the allocation aims to safeguard strategic infrastructure, and in a third case (Silwood Street) the allocation reflects a recent planning consent. The final new allocation, since the Draft Plan stage (2020) is Bermondsey Dive Under SIL and LSIS, which is an important site that is discussed further in Section 9. The allocation is for new SIL to allow for the de-designation of some sites at Surrey Canal SIL and to provide flexibility for arches by designating them as LSIS.

- Eleven sites submitted through the call for sites held in parallel to the Regulation 18 consultation (2020) were not considered further by the Council on the basis that there was known to be sufficient housing supply from housing sites previously consulted-on (plus Silwood Street, discussed above), in light of latest understanding of the borough-wide need / supply reasonably under consideration.¹⁰

5.3.8 In total, therefore, the latest situation is that 75 sites (81 - 7 - 3 + 4) have been identified as suitable for allocation. Table 5.2 presents further summary information, whilst Box 5.1 elaborates on reasons for excluding sites through the site selection process (N.B. unchanged since the Interim SA Report).

5.3.9 Ultimately, in 2022 (as per 2020), the Council and AECOM determined that the 75 sites identified as suitable for allocations should be **held-constant** across the reasonable growth scenarios. This leaves the possibility of reasonable growth scenarios varying in terms of density and use mix, as discussed below.

Table 5.1: Site sifting criteria applied by the Council

Criteria	Details
Existing site allocation or consented scheme	Existing site allocations, or consented schemes, where development has been fully delivered, or those which have planning consent and are expected to be delivered by the start of the new Local Plan period (i.e. 2020), were excluded.
Site size	Sites less than 0.25 hectares in size are not considered strategic in scale and were therefore excluded. However, limited exceptions were made for small sites where there were good planning reasons for allocation (e.g. important sites in the local context).
Open space	Sites on protected open space are not considered appropriate for development and were therefore excluded. However, limited exceptions were made where the site was demonstrably necessary to facilitate the delivery of strategic infrastructure (e.g. release of small portion of MOL at Catford to enable the re-alignment of the South Circular).
Biodiversity	Sites on protected nature conservation sites.
Social housing estates	Social housing estates were excluded. This is owing to the requirement for residents' ballots on regeneration and renewal schemes, and the resultant uncertainty regarding deliverability of the site allocation. Exceptions were made for sites where there is an extant planning consent for estate regeneration, or future site regeneration has been supported in-principle through a formal ballot.
Other housing	Sites with HMOs were excluded in line with the London SHLAA methodology. Sites with gypsy and traveller provision were excluded.
Employment land	Designated employment sites were excluded. However, limited exceptions were made for sites identified in the Employment Land Study Update (2019) as suitable for alternative uses (on the provision of no net loss of industrial capacity).
Community infrastructure	Sites containing strategic community infrastructure (such as education and health care facilities) were excluded. However, limited exceptions were made for sites which landowners considered suitable for inclusion as part of the management of the public sector estate, with clear mechanisms or proposals for future delivery. ¹¹
Cultural asset	Site containing strategic cultural institutions (e.g. Horniman Museum and Gardens).
Heritage assets	Where asses would pose a significant constraint to redevelopment.
Strategic infrastructure	Sites were included, or land use designations proposed, where land is required to be safeguarded to facilitate the delivery of strategic infrastructure (transport, waste management, utilities, flood defences). This is particularly for transport infrastructure associated with the Bakerloo Line extension and station interchanges.
Public safety	Sites including public safety infrastructure and services (such as fire stations).

¹⁰ By way of further explanation, it is helpful to contrast the discussion of reasonable 'quantum' options from [Section 5.2](#) of the Regulation 18 Interim SA Report to the equivalent discussion presented in Section 5.2 above.

¹¹ Where site allocations include community infrastructure, future development proposals will be required to safeguard and/or enhance this infrastructure, in line with the draft Local Plan policies.

Table 5.2: Summary of the site selection process (adapted from the Site Allocations Background Paper)

Status	Reason	Unchanged since Regulation 18	New since Regulation 18
Sites proposed for allocation	Has planning permission	12	1
	Existing allocation	15	-
	SHLAA 'potential development site'	16	3
	SHLAA 'low probability site'	10	-
	Not supported by SHLAA	9	-
	Not considered by the SHLAA	9	-
Total sites proposed for allocation		71	4
Excluded sites (more clear-cut)	Fully delivered	52	-
	Expected to be delivered in 2020	6	-
	Not strategic in scale	19	-
	Deliverability issues	11	-
	Strategic infrastructure	18	-
	Reg 18 (2020) call for sites (see above)	-	11
	Site removed since Reg 18 (see above)	-	7
Excluded sites (less clear-cut)	Community infrastructure	93	-
	Open space and/or biodiversity	24	-
	Safeguarded employment land	24	-
	Heritage assets	24	-
	Social housing estate	15	-
	Public safety	4	-
	Other housing	4	-
	Cultural institutions	3	-
	Site removed since Reg 18 (see above)	-	3
Total excluded sites		297	21
Total sites		368	25

Box 5.1: Further detail on reasons for excluding sites

As discussed, the Council completed a criteria-based site selection process ahead of the Draft Plan consultation (2020), which identified 81 sites as suitable for allocation and, conversely, ruled out 297 sites.

106 sites were excluded for relatively “clear-cut” reasons.

The following bullet points explore “less clear cut” reasons for excluding sites:

- Community infrastructure – the GLA London SHLAA identified a wide range of sites comprising existing community infrastructure. The SHLAA identified a large number of sites as unsuitable for housing or having low probability of delivering housing in the plan period. These sites are relatively straightforward to dismiss as unsuitable for allocation in the Local Plan. However, the SHLAA also identified three community infrastructure sites as potentially suitable for housing - namely Lewisham Hospital; South Lewisham Health Centre; and Honor Oak Community Centre – which the Council does not propose to allocate. The Council identified these sites as unsuitable taking account of the potential for effective re-provision of the community infrastructure (and noting that DM policies will be included in the plan that allow flexibility for windfall development options to be considered on a case by case basis).
- Safeguarded employment land – the Employment Land Study (2019) explored all existing designated employment sites in the Borough with a view to identifying those that might potentially be suitable for allocation in order to facilitate enabling mixed-use development (i.e. employment plus residential), to include new modern workspace and an overall ‘no net loss’ of employment floorspace. The study applies a range of criteria, including relating to walking, cycling and public transport accessibility, with a view to identifying sites more/less suited to mixed use redevelopment. The conclusion reached was that ten sites, totalling 11.3ha (out of a total employment land resource of 78.1 ha) are potentially suitable for mixed use development.
- Social housing estates – a total of 15 identified sites currently comprising all or part of a social housing estate were ruled out as unsuitable for allocation. The majority of these were identified by the SHLAA as having low probability of delivering housing in the plan period; however, the SHLAA did identify two sites in Lewisham as having ‘potential to deliver housing’. The Council has considered these sites closely, but does not consider that it is suitable for allocation in the plan period given the requirement for a ballot on regeneration schemes and uncertainty over site deliverability.
- Heritage – 23 sites were ruled-out by the SHLAA (i.e. identified as unsuitable for housing), which serves as an indication that the reasons were quite clear cut. One additional site that came forward through the Lewisham Call for Sites (Master Shipwrights House) was additionally ruled-out. This is a grade II* listed building.
- Flood risk – no sites were ruled out as unsuitable on flood risk grounds; however, the decision was made to change the proposed use at one of the proposed allocations - Molesworth Street Car Park – from mixed use to employment to reflect the flood risk constraint.¹²



Modern units at Bromley Road SIL, which is the only SIL outside of Deptford/New Cross and identified as requiring safeguarding for employment uses by the Employment Land Study (2019)

¹² N.B. the latest situation is that this site is no longer an allocation as it is needed for flood storage.

Exploring use mix options

- 5.3.10 The second 'bottom-up' input to the process of selecting reasonable growth scenarios involved exploring the mix of uses to be delivered by specific sites / types of site.
- 5.3.11 There has been considerable work undertaken to adjust the approach to assigning each allocation an indicative use mix since the Regulation 18 consultation stage, taking account of consultation responses received, further evidence and ongoing discussions. A key consideration was an identified need to be less prescriptive, i.e. introduce greater flexibility to take account of site specific considerations. Table 5.3 compares the Regulation 18 approach to the new proposed approach. Notable changes include:
- Sites requiring re-provision of employment/commercial uses (i.e. SIL/LSIS and non-designated employment) – recognition that certain sites are less suited to residential / more suited to employment.
 - Sites requiring re-provision of high value retail uses or community facilities – recognition that certain sites are less suited to residential / more suited to town centre uses, specifically where there is a need to reprovide large footprint uses such as health centres or retail stores.
 - Mixed use development in major, district and local centres – new flexibility for additional employment to ensure a good mix of uses in town centres.
 - Bell Green / Lower Sydenham masterplan area – reduced employment given the location and the size of the sites in question.
 - Other sites suitable for mixed-use - new flexibility for less residential / more employment for a few specific sites, notably Engate Street, Place Ladywell and Ravensbourne Retail park.
- 5.3.12 Ultimately, the conclusion was reached that the matter of use mix could reasonably be **held-constant** across the reasonable growth scenarios, i.e. need not be considered further as a potential variable (as per the matter of site selection, but unlike the matter of development density).

Table 5.3: Assigning an indicative use mix to each allocation (red indicates lower)

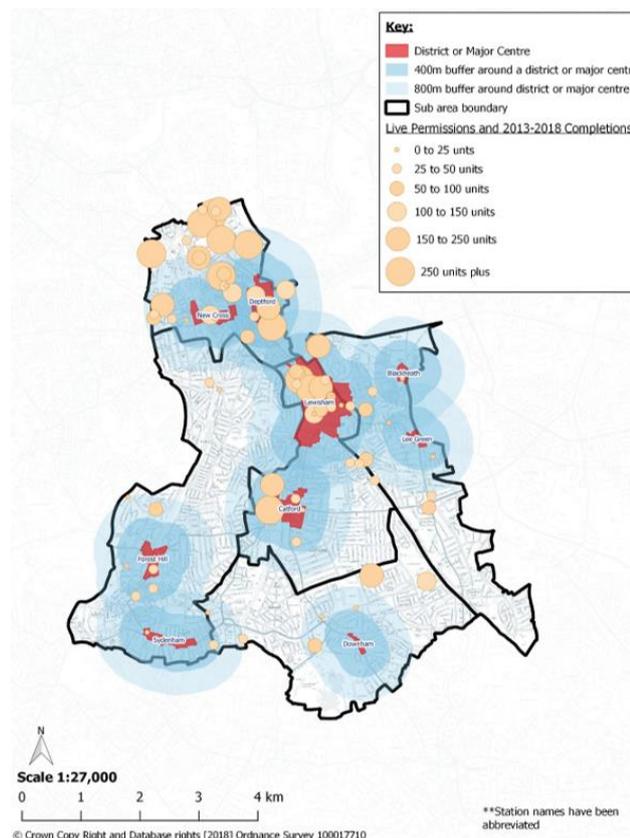
Type of site	% Residential		% Town centre uses		% Employment	
	Reg 18	Reg 19	Reg 18	Reg 19	Reg 18	Reg 19
Sites requiring re-provision of employment/commercial uses	67	40-67	0		33	33-60
Sites requiring re-provision of high value retail uses or community facilities	67	45-67	33	33-50	0	0-5
Mixed use development in major, district and local centres	75	70-75	20	20	5	5-10
Bell Green / Lower Sydenham area	70	75	20%	20	10	5
Other sites suitable for mixed-use	85	47-90	10	0-20	5	0-33
Lewisham town centre core	60		30		10	
Newly designated SIL	N/a	0	N/a	0	N/a	100

Exploring density options

5.3.13 There is a standard methodology for calculating density based on the London-wide Strategic Housing Land Availability Assessment (SHLAA) methodology used to inform the draft London Plan. It involves consideration of: size of the site (site area); character setting of the site (e.g. suburban, urban, highly urban); GLA assumptions on density in these character typologies; Public Transport Accessibility Levels (PTAL); mix of land uses; and existing housing units and non-residential floorspace.

5.3.14 Following application of the standard methodology there is also a need for a check and challenge exercise involving considering the indicative densities against actual densities recently achieved locally, as set out in the Development Density Background Paper (2020) – see Figure 5.11.

Figure 5.11: Density of recent completions and permissions



5.3.15 Where the standard method derived figure is called into question then the next step is to explore density in detail through a sensitivity analysis process. This involves taking detailed account of site sensitivities, including in respect of heritage assets and open spaces, and also giving consideration whether the site must contribute to the transition between two character areas, e.g. sites at the edge of a town or local centre.

5.3.16 Finally, it is important to note that detailed site specific information is available through:

- Planning consents - the agreed density for consented sites should be reflected in the Local Plan unless it is the case that there is an advanced pre-application discussion for a revised scheme.
- Submitted application or advanced pre-application discussions - where reliable information on capacity is available following pre-application discussions then it is appropriate to take this into account.
- Area frameworks / masterplans – account can be taken of design-led site capacity work set out within the area frameworks / masterplans for the New Cross Area, the A21 Corridor and Catford Town Centre.
- Bell Green / Lower Sydenham area – the Draft Plan (2020) presented density alternatives for six sites in this area, reflecting the potential for higher densities under a scenario whereby BLE phase 2 is delivered in the plan period, and it remains appropriate to take a similar approach at this current stage.

5.3.17 Table 5.4 presents the route taken to arriving at an indicative density for all proposed allocations.

5.3.18 Ultimately, the Council and AECOM determined that, whilst for the great majority of sites the density figure that emerges following application of the methodology discussed above is robust, there is the potential to explore **higher density options** at certain sites through the assessment of reasonable growth scenarios. As such, the matter of development density is considered further below, within Section 5.4.

A note on Table 5.4

5.3.19 The picture is complicated for a number of sites, in that there is a need to take a ‘duel approach’ to determining an indicative density. Firstly, this is the case for a number of sites that are part consented, or part at the application or pre-app stage. Secondly, this is the case for several sites where there is a need to apply separate methodologies to considering residential and non-residential uses, in order to arrive at an overall density figure. For example, the three frameworks (discussed above) provide good evidence in respect of residential uses, but less so in respect of non-residential.

Table 5.4: The route taken to determining development density at each of the proposed allocations

Sub-area	Site name	Consented or resolution to grant	App or pre-app	Framework area	Standard method	Standard method + sensitivity
Central Area	Lewisham Gateway	Yes				
	Lewisham Shopping Centre				Yes	
	Land at Engate Street			Yes		Yes
	Conington Road	Yes				
	Land at Conington Road and Lewisham Road (Tesco)					Yes
	Lewisham Retail Park, Loampit Vale	Yes				
	110-114 Loampit Vale				Yes	
	Silver Road and Axion House	Yes				
	House on the Hill, Slaithwaite Road			Yes		Yes
	Church Grove Self-Build	Yes				
	Ladywell Play Tower		Yes			
	PLACE/Ladywell (Former Ladywell Leisure Centre)		Yes			Yes
	Driving Test Centre, Nightingale Grove					Yes
	Land at Nightingale Grove and Maythorne Cottages	Yes*				Yes
	Land at Rushey Green and Bradgate Road (Aldi)			Yes		Yes
	Catford Shopping Centre and Milford Towers			Yes	Yes	
	Catford Island			Yes		
	Laurence House and Civic Centre			Yes		
	Wickes and Halfords			Yes		
	Ravensbourne Retail Park			Yes		Yes
North Area	Convoys Wharf MEL	Yes				
	Deptford Landings MEL and Scott House	Yes	Yes		Yes	
	Evelyn Court LSIS		Yes		Yes	
	Neptune Wharf MEL	Yes				
	Surrey Canal Road and Trundleys Road LSIS	Yes*				Yes
	Apollo Business Centre LSIS					Yes
	Silwood Street	Yes				
	Surrey Canal Triangle MEL	Yes*				Yes
	Besson Street Kender Triangle	Yes				
	Former Hatcham Works, New Cross Road			Yes		
	Goodwood Road and New Cross Road			Yes		
	Achilles Street		Yes			
	Former Deptford Green School (Upper School Site)	Yes				
	Albany Theatre					Yes
	N of Reginald Rd and S of Frankham St (Tidemill School)	Yes				
	Lower Creekside LSIS	Yes*				Yes
	Sun Wharf MEL		Yes			
	Creekside Village East, Thanet Wharf MEL	Yes				

* The sites highlighted with an asterisk are only *part* consented (or resolution to grant consent)

Sub-area	Site name	Consented or resolution to grant	App or pre-app	Framework area	Standard method	Standard method + sensitivity
East Area	Heathside and Lethbridge Estate	Yes				
	Blackheath Hill LSIS	Yes				
	Leegate Shopping Centre		Yes			
	Sainsbury's Lee Green				Yes	
	Land at Lee High Road and Lee Road				Yes	
	Southbrook Mews				Yes	
	Mayfields Hostel, Burnt Ash Road		Yes			
	Sainsbury Local and West of Grove Park Station				Yes	
South Area*	Former Bell Green Gas Holders and Memorial Hall					Yes
	Bell Green Retail Park				Yes	
	Sainsbury's Bell Green				Yes	
	Stanton Square LSIS				Yes	
	Sydenham Green Group Practice				Yes	
	Worsley Bridge Road LSIS					Yes
	Lidl, Southend lane				Yes	
	Land at Pool Court		Yes			
	Catford Police Station			Yes	Yes	
	Homebase / Argos, Bromley Road				Yes	
	Beadles Garage			Yes	Yes	
	Downham Co-op				Yes	
	Excalibur Estate	Yes				
	Bestway Cash and Carry				Yes	
West Area	111 - 115 Endwell Road				Yes	
	6 Mantle Rd				Yes	
	Jenner Health Centre				Yes	
	Land at Forest Hill Station East				Yes	
	Land at Forest Hill Station West				Yes	
	Perry Vale LSIS					Yes
	Clyde Vale LSIS					Yes
	Featherstone Lodge, Eliot Bank	Yes				
	Willow Way LSIS				Yes	
	74-78 Sydenham Road				Yes	
	Land at Sydenham Road and Loxley Close				Yes	
113 to 157 Sydenham Road				Yes		

* To reiterate, the six sites within the South Area highlighted with **bold text** are those where there is considered to be the potential to achieve higher densities under a BLE Phase 2 scenario.

5.4 Sub area issues and options

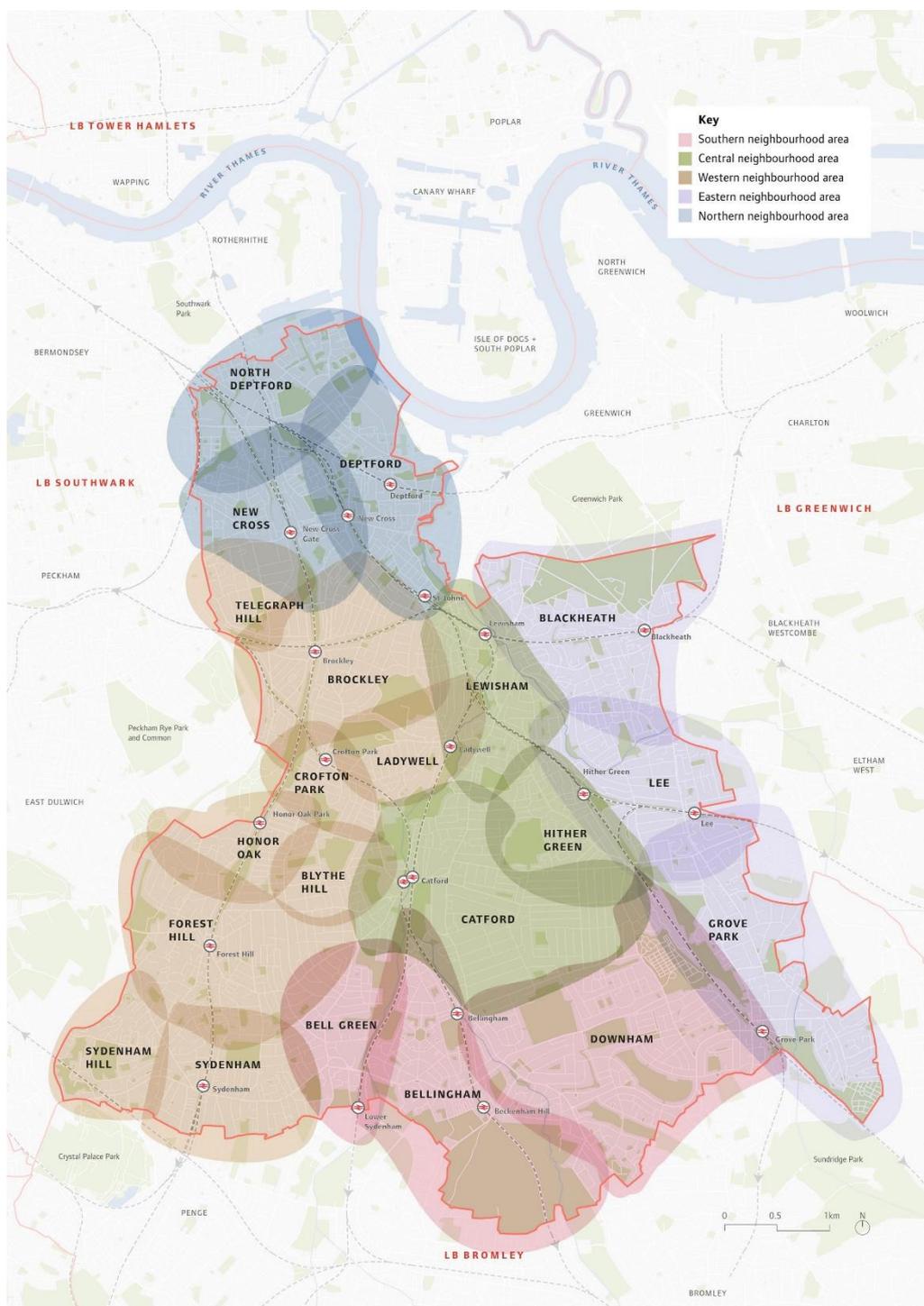
5.4.1 The third step in the process of arriving at reasonable growth scenarios involved exploring issues and options at each of the Borough’s five defined sub-areas in turn, drawing upon the ‘top-down’ and ‘bottom-up’ analysis presented within Sections 5.2 and 5.3 above.

5.4.2 For each sub-area, the aim to reach a conclusion on whether the approach to development:

- can reasonably be held **constant** across the reasonable growth scenarios; or
- needs to be a **variable** and, if so, what the **alternatives** are.

5.4.3 In practice, and reflecting the outcome of discussion in Section 5.3, for each sub-area the aim is to identify sites where there is the potential for higher **density** development over-and-above the preferred approach.

Figure 5.12: The five sub-areas



Central sub-area

- 5.4.4 Lewisham's Central Area contains the neighbourhoods of Lewisham, Hither Green and Catford. It has a strong relationship with the Ravensbourne, Pool, and Quaggy rivers and their river valley corridors. The housing character is generally varied as a result of post-WWII patterns of development, with conservation areas and listed buildings within and adjacent to the area.
- 5.4.5 For the purposes of IIA, it was considered appropriate to explore **four sub sub-areas**.

Lewisham

- 5.4.6 Within Lewisham many sites have recently been redeveloped with high quality designs. However much of the town centre remains fragmented and disconnected as a result of larger sites and blocks, with areas of poorer quality public realm including the pedestrian and cycle environment, particularly on Lewisham High Street. Many of the older sites have a poor quality retail and leisure offer.
- 5.4.7 The following sites (from Figure 5.13) fall within this area: 1, 2, 4, 5, 7, 8, 9, 10. There are two larger sites that are relatively non-advanced, in that there is no planning consent in place, nor is it the case that a proposed approach to density has emerged through pre-application discussions, namely Lewisham Shopping Centre and Land at Conington Road and Lewisham Road (Tesco).
- 5.4.8 Also, House on the Hill and 110-114 Loampit Vale are at a relatively non-advanced stage, but both are small peripheral sites, not associated with a strategic opportunity to explore higher density.
- 5.4.9 The BLE would further enhance the PTAL and could lead to some additional development opportunity, e.g. as pre-application discussions or planning consents are revisited. Also, the potential for new land to come forward, due to land-owners working together to assemble complex sites, can be envisaged. However, any uplift in homes delivered due to the BLE would be modest. On balance, and as per the view taken in 2020 (Interim SA Report, 2020), it is considered fair to assume an **uplift of c.10%**.

Catford

- 5.4.10 Catford comprises the civic hub of the Borough with a key focal point at the historic Broadway Theatre. Many key sites have recently been redeveloped to a high design standard. However, the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, has led to high levels of severance and poor permeability and legibility. Redevelopment opportunities exist alongside planned strategic transport investment that will allow the area to be 'reimagined', with the Catford Town Centre Framework setting out a vision for Catford to become London's greenest town centre.
- 5.4.11 The following sites (from Figure 5.13) fall within this area: 17, 18, 19, 21, 22. All bar site 22 fall within the area covered by the emerging Town Centre Masterplan, through which preferred indicative densities have been established. The overall approach seeks to strike a balance between suitability for tall buildings in transport terms but constraints to tall buildings in terms of townscape and heritage. The current proposal is support the densities set out in the Masterplan. However, as per the view taken in 2020, it is considered that it is reasonable to explore the option of creating a tall buildings cluster at Catford. The specifics would need to be explored further through a detailed study, but there might be potential for an **uplift of c.20%**.

A21 corridor (Lewisham to Catford)

- 5.4.12 The A21 corridor is currently dominated by traffic with a poor quality public realm and pedestrian and cycle environment. The High Street is generally not well connected with surrounding neighbourhoods and is dominated by larger sites and blocks leading to irregular east-west connections. Whilst the character of the corridor is well established around Lewisham Hospital (with opportunities to 'reinforce' the existing character), opportunities exist for intensification along the majority of the corridor.
- 5.4.13 The following sites (from Figure 5.13) fall within this area: 3, 11, 12, 13, 16. There are two sites that are relatively non-advanced. However, both sites have recently been examined in detail through the A21 Development Framework, such that it is difficult to envisage the potential for higher density development:
- Land at Engate Street – is located at the southern edge of Lewisham town centre. The Draft Plan (2020) proposed 193 homes, but the A21 Development Framework identifies capacity for 112 homes.
 - Land at Rushey Green and Bradgate Road (Aldi) – is located a short distance to the north of Catford. The Draft Plan (2020) proposed 119 homes, but the A21 Development Framework suggests 88 homes.

5.4.14 BLE Phase 2 would enhance the PTAL and could lead to some additional development opportunity, but any uplift in homes delivered would likely be modest. It is fair to assume an **uplift of c.10%**.

Hither Green

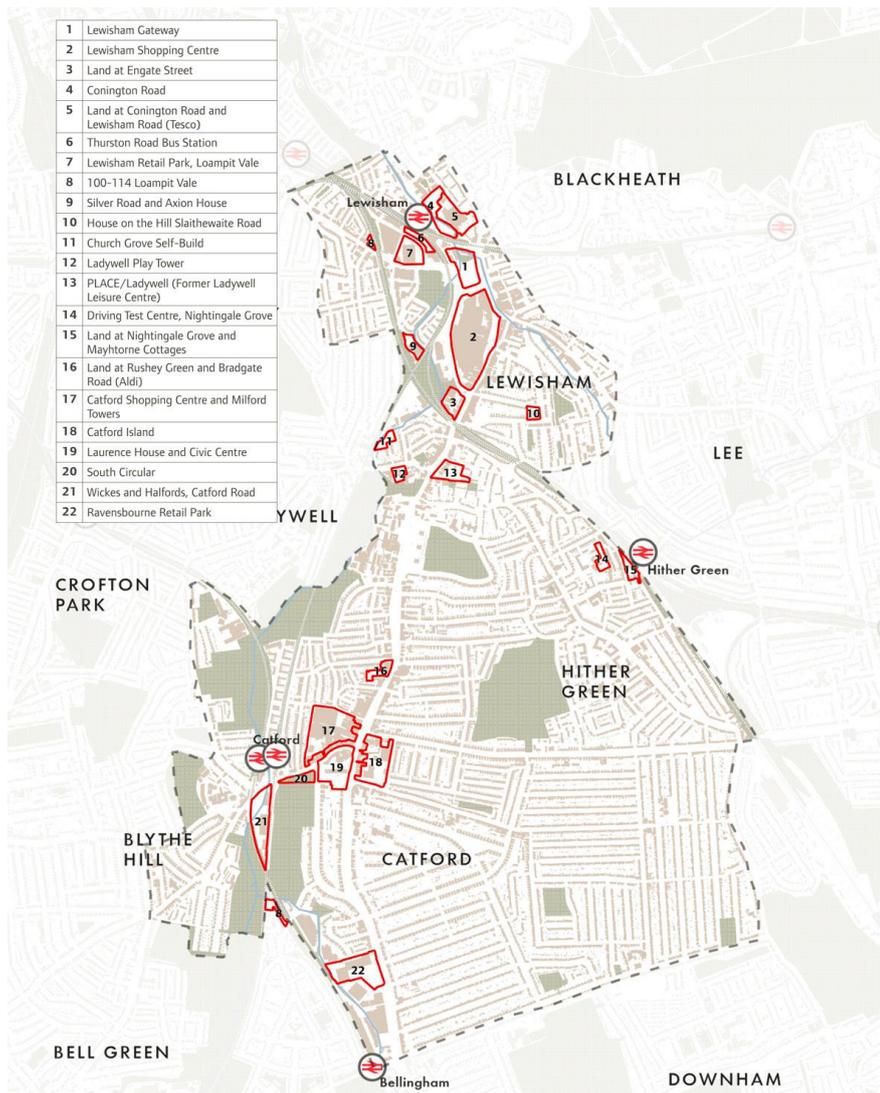
5.4.15 Hither Green is characterised by predominantly residential areas of a Victorian character which are serviced by local centres and parades, including near Hither Green station and along Hither Green Lane. The prominence of the rail lines creates severance and limits connectivity through the neighbourhood and east towards Lee. The station approach to the west of the station has poorer quality public realm. There are opportunities for the sensitive intensification of the area through small sites development to ‘reinforce’ the existing local character and enhance the vitality and viability of commercial areas.

5.4.16 The following sites (from Figure 5.13) fall within this area: 14 and 15. One of these, namely Land at Nightingale Grove and Maythorne Cottages, is now consented for 22 homes (with the Draft Plan having anticipated 42 homes), whilst the other site, namely Driving Test Centre, Nightingale Grove, is a small site and more peripheral, hence suited to application of the standard method (40 homes). A key message received through the Draft Plan consultation was the need for a clear strategy for Hither Green to address existing issues; however, it is not clear that this serves as an argument for higher density development.

Conclusion

5.4.17 In conclusion there is a need to explore the approach to growth at Lewisham, Catford and the intervening A21 corridor as a variable across the reasonable spatial strategy growth scenarios. Specifically, there is a reasonable need to explore both the approach to density that emerges following application of the Council’s methodology and the **density uplift options** identified above.

Figure 5.13: Proposed central area allocations



North sub-area

- 5.4.18 Lewisham's North area contains the neighbourhoods of North Deptford, Deptford, and New Cross. The waterway network helps to define the area, particularly the River Thames that establishes its northern boundary. The River Ravensbourne and Deptford Creek, the latter forming the boundary with Royal Borough of Greenwich, are also prominent physical features and contribute to a Thames-side character.
- 5.4.19 This area has a rich and varied historic environment with a number of conservation areas. Historic buildings and structures include churches, Georgian townhouses, Victorian terraces, industrial warehouses and railway viaducts. Local character is also strongly influenced by the historic dockyard and maritime industries. The area was heavily damaged in WWII and redevelopment through the subsequent interwar and postwar periods has given rise to a mixed urban character, with a number of large estates featuring large plots and mid-rise, medium density housing, including the Pepys Estate.
- 5.4.20 The character of this area is also strongly informed by the layout of historic roads and railway infrastructure that dissect much of the area. However these main routes are dominated by vehicular traffic and typically suffer from poor quality public realm, limiting their suitability for pedestrians and cyclists.
- 5.4.21 This area contains much of the Borough's employment land stock, giving it a distinctive industrial character. There are designated and non-designated employment sites situated throughout, including the Strategic Industrial Location (SIL) at Surrey Canal Triangle and clusters of locally significant sites around Deptford Creekside. Several larger industrial sites have recently undergone a plan-led process of regeneration, with mixed-use residential and employment schemes introduced. Renewal of older employment sites is an important component of the area's evolving character.
- 5.4.22 Recent changes to the local economy have also seen the area emerge as one of London's leading centres for the creative and digital industries, gaining recognition from the London Mayor as a Creative Enterprise Zone. The Council is committed to working in partnership with world class institutions such as Goldsmiths, Lewisham College, the Albany and Laban Centre, which are at the heart of this success.
- 5.4.23 The historic high streets at Deptford and New Cross offer provision of a rich and vibrant mix of shops, services and independent traders. Deptford market, situated at the heart of Deptford district centre, is a focal point for community activity and a well-known visitor destination. The town centres benefit from their proximity to important cultural and educational institutions.
- 5.4.24 The network of green infrastructure in this area, including parks and open spaces, are valuable natural and recreational assets within the predominantly urban context. Many newer developments have delivered public realm improvements, opening up access to and naturalising parts of Deptford Creek and the River Ravensbourne, as well as providing improved access to the River Thames. Many neighbourhoods however have a limited number of street trees and could benefit from urban greening.
- 5.4.25 The great majority of sites are consented or at an advanced stage of pre-application discussion. Three sites are now at the pre-application stage and supported for notably different densities than anticipated within the Draft Plan, which serves to illustrate the challenge of making accurate assumptions in respect of development density at the Local Plan stage. Specifically:
- Achilles Street - 363 homes versus 651 homes in the Draft Plan;
 - Evelyn Court LSIS - 102 homes versus 38 homes in the Draft Plan;
 - Apollo Business Centre LSIS - 98 homes versus 59 in the Draft Plan.
- 5.4.26 With regards to the remaining three sites:
- Former Hatcham Works, New Cross Road; and Goodwood Road / New Cross Road – are associated with New Cross Station and within a conservation area. Considered through the New Cross Gate SPD.¹³
 - Albany Theatre – is a sensitive site located within a conservation area. The current proposal is for 119 homes, with the Draft Plan having proposed 102 homes.

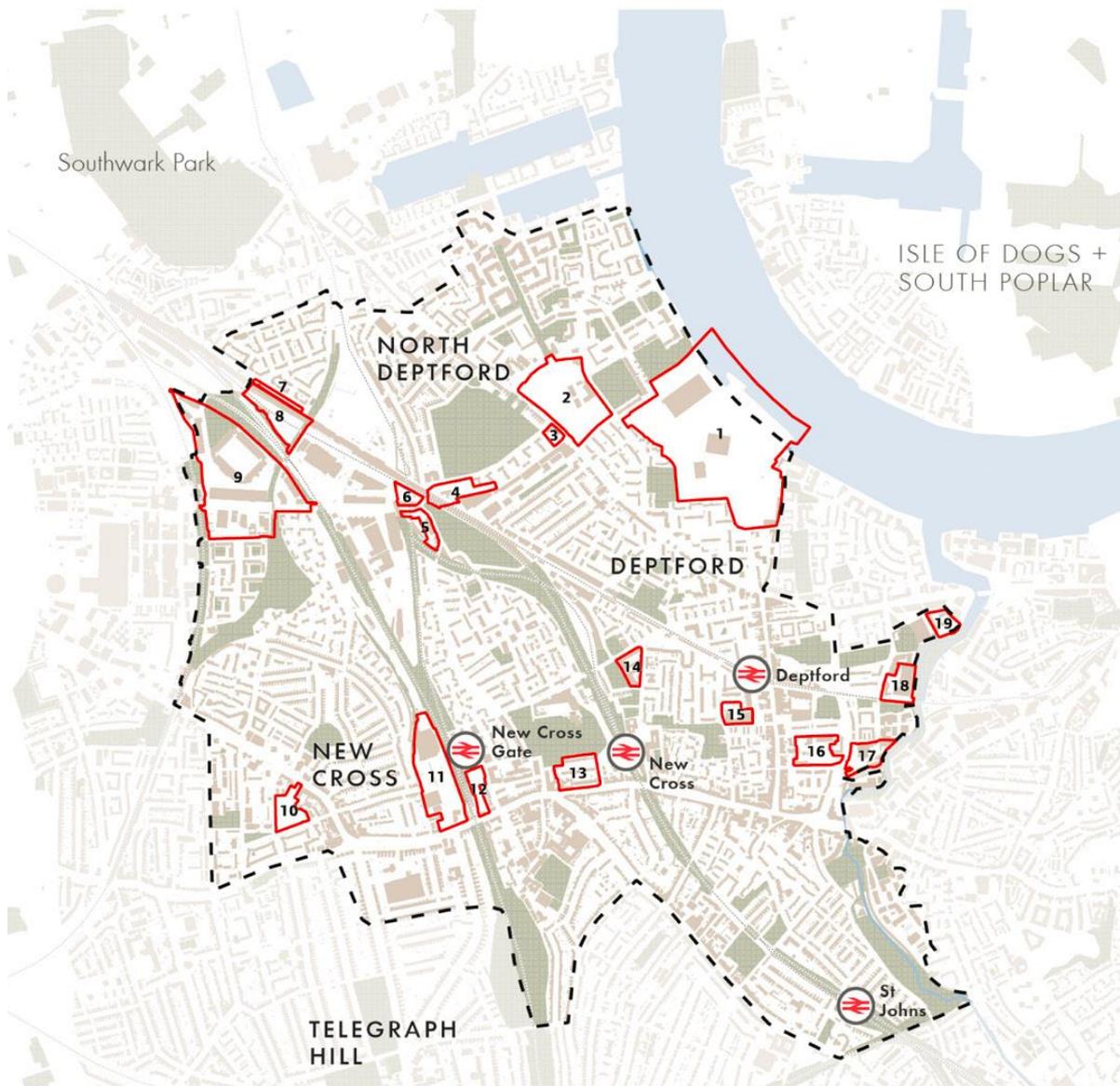
¹³ The capacity of these sites has been adjusted, since the Draft Plan stage, to bring the approach into line with the SPD. Specifically: Former Hatcham Works, New Cross Road was supported for 912 homes, now 800; and Goodwood Road and New Cross Road was supported for 121 homes, now 167).

5.4.27 It is difficult to identify reasons for exploring an approach to assigning density that differs significantly from the Council’s methodology. The BLE would further enhance the PTAL in the vicinity of New Cross Gate station; however, any uplift in homes delivered would be modest. It is fair to assume an **uplift of c.10%** in the New Cros Gate station area (sites 11 and 12 from Figure 5.14), as per the approach taken in 2020.

5.4.28 In **conclusion** there is a need to explore the approach to growth as a variable across the reasonable growth scenarios. Specifically, it is reasonable to explore both the approach to density that emerges following application of the Council’s methodology and the **density uplift option** identified above.

Figure 5.14: Proposed north area allocations

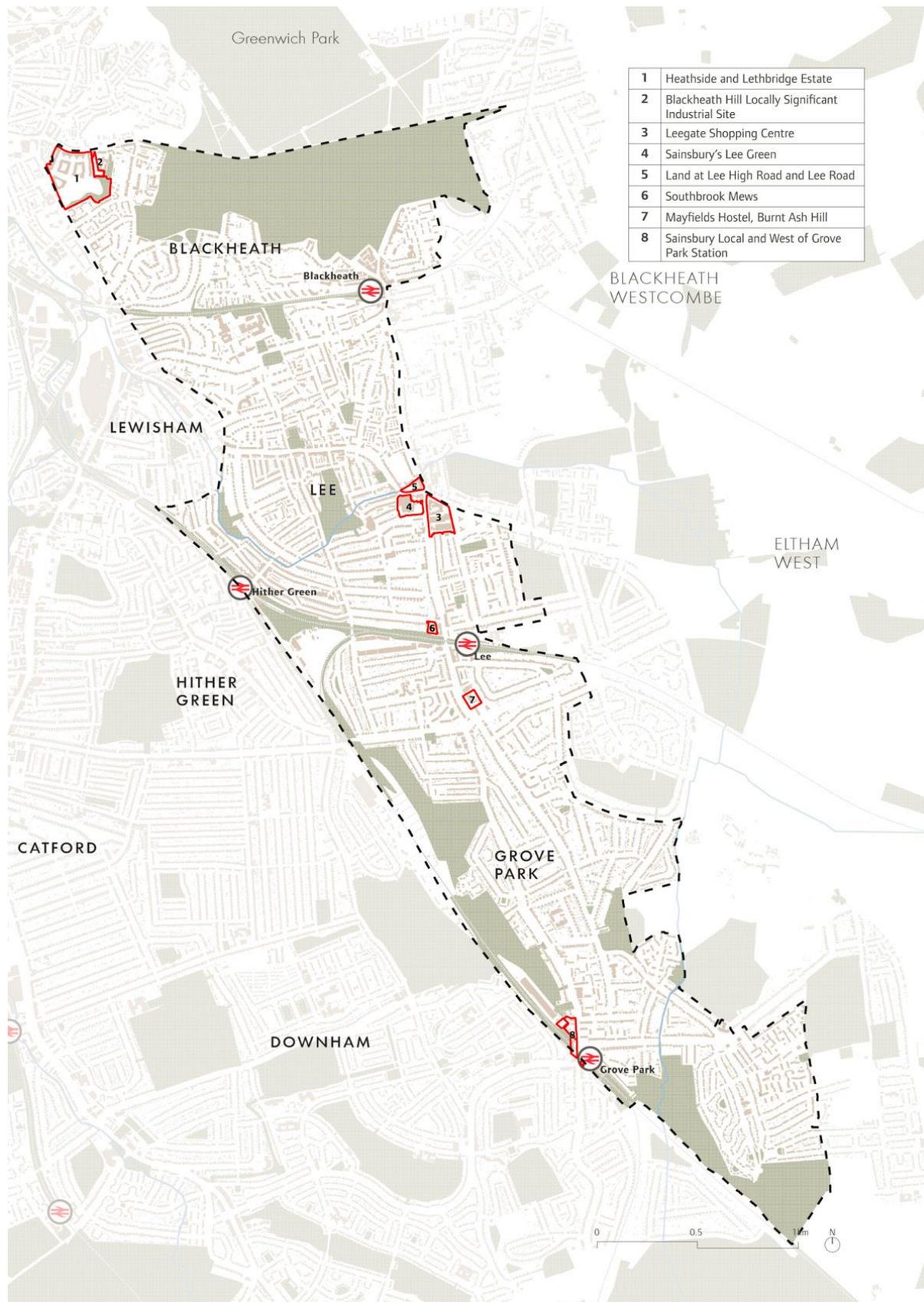
1	Convoys Wharf Mixed Use Employment Location	6	Apollo Business Centre Locally Significant Industrial Site	14	Former Deptford Green School (Upper School Site)
2	Deptford Landings Mixed Use Employment Location (formerly known as Oxestalls Road) and Scott House	7	Silwood Street	15	Albany Theatre
3	Evelyn Court Locally Significant Industrial Site	8	Bermondsey Dive Under	16	Land north of Reginald Road and south of Frankham Street (former Tidemill School)
4	Neptune Wharf Mixed Use Employment Location	9	Surrey Canal Triangle Mixed-use Employment Location	17	Lower Creekside Locally Significant Industrial Site
5	Surrey Canal Road and Trundleys Road Locally Significant	10	Besson Street (Kender Triangle)	18	Sun Wharf Mixed-use Employment Location (including Network Rail Arches)
		11	Former Hatcham Works, New Cross Road	19	Creekside Village East, Thanet Wharf Mixed-Use Employment Location
		12	Goodwood Road and New Cross Road		
		13	Achilles Street		



East sub-area

- 5.4.29 Lewisham's eastern area comprises the neighbourhoods of Blackheath, Lee and Grove Park. It is made up of historic villages that formed along the route to Greenwich, which expanded dramatically with the arrival of the railways. The area forms the eastern edge of the Borough and this is reinforced by the continuous stretch of green and open spaces that run from Blackheath in the area's north to Elmstead Wood in the south. Green infrastructure, including the Green Chain Walk, is a key defining feature.
- 5.4.30 This area has a predominantly suburban character. This is reflected by the built form and layout of the Victorian terraces, the formal historic village of Blackheath, Georgian and Regency villas, as well as 20th century housing, interwar homes and council estates. Residential developments typically feature wide plots, large gardens and generous street sections.
- 5.4.31 This area contains the district centres of Blackheath and Lee Green. Blackheath has a very strong historic character and is a visitor destination. Lee Green is one of the Borough's smallest district centres and serves its local catchment with a mix of shops and services. It includes several large format retail units and the Leegate Shopping Centre, which was built in the 1960s and, following a planning application, a resolution is in place for its redevelopment. The centre suffers from areas of poorer quality public realm.
- 5.4.32 Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular. Grove Park station and the local centre comprise a gateway and focal point in the neighbourhood.
- 5.4.33 The Quaggy River, the upper reaches of which are known as Kyd Brook, passes through parts of this area at Chinbrook Meadows, where the river channel has been naturalised with river banks reintroduced to encourage wildlife. Much of the subsequent length of the river to the boundary with the London Borough of Bromley is within concrete channels or has been culverted.
- 5.4.34 The majority of proposed sites are uncommitted, in that they are neither consented nor is there a pre-application discussions at an advanced stage. However, the two most significant sites are committed, with only one of the uncommitted sites likely to yield in excess of 100 homes. None of the uncommitted sites require a sensitivity-led process in order to arrive at a density figure, the BLE would not impact on PTAL in this area and there are no other strategic reasons for exploring higher density options.
- 5.4.35 In **conclusion** it is reasonable for the approach to growth in this area to be **held constant** across the reasonable growth scenarios. Specifically, it is reasonable to hold constant the approach to density that emerges following application of the Council's methodology.

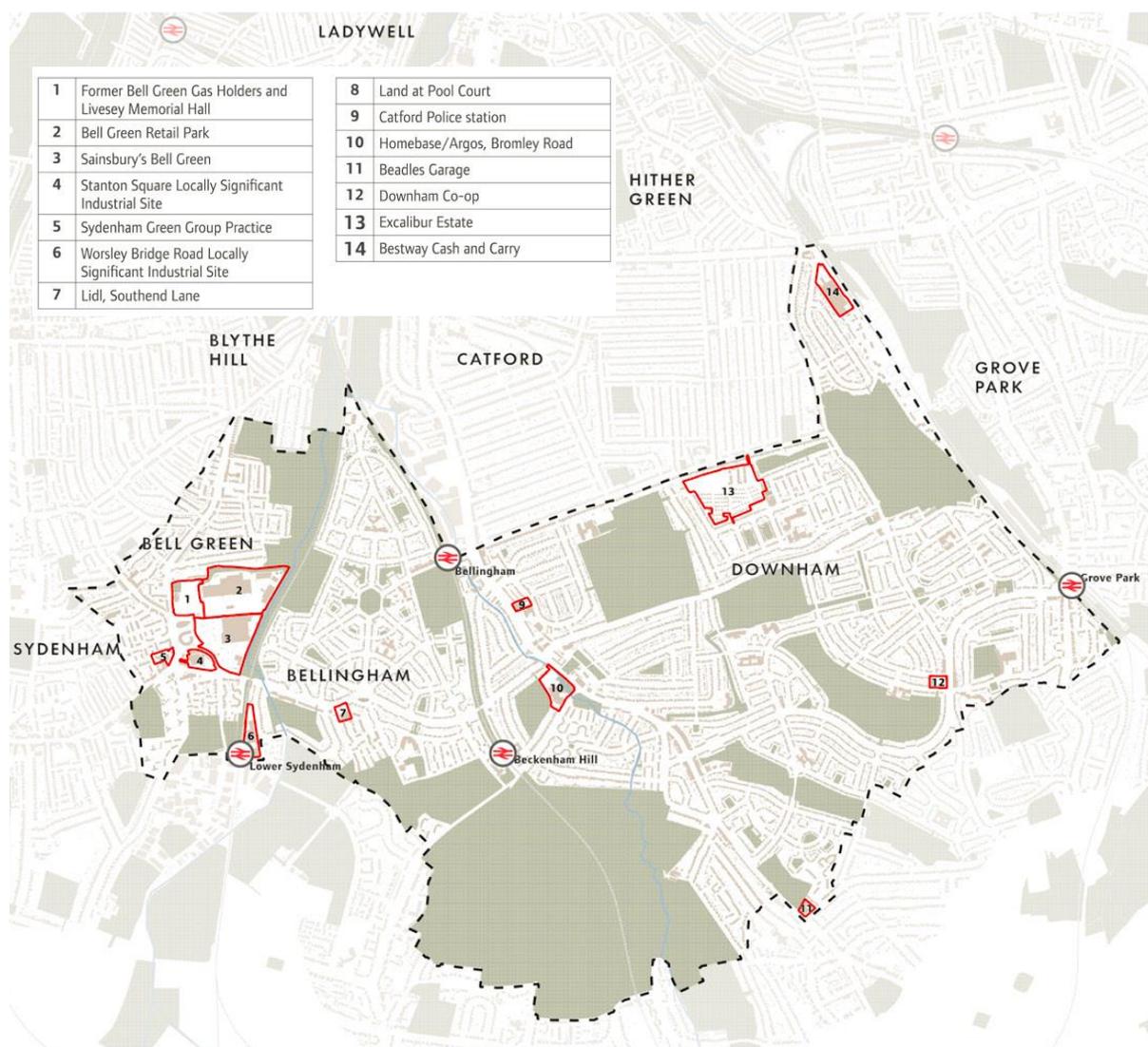
Figure 5.15: Proposed east area allocations



South sub-area

- 5.4.36 This area includes the neighbourhoods of Bellingham, Downham and Bell Green. It derives much of its character from the interwar homes constructed by the London County Council (LCC). These estates were influenced by 'garden city' principles and provide for a relatively homogenous form of low density housing throughout the area. There are clusters of higher density residential uses around Grove Park and Beckenham Hill stations, and pockets of Victorian housing in Bell Green.
- 5.4.37 This area includes the district town centre of Downham that serves the local catchment, however it has a limited range of services and convenience shopping compared to other district centres in the Borough. The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of development sites.
- 5.4.38 Many of the train stations and town centres in the South Area are poorly connected to their surrounding neighbourhoods. Good linkages between key destinations are limited, and the area suffers from low levels of public transport accessibility. Along many of the key movement corridors there is a poor public realm, with many of these routes dominated by vehicular traffic.
- 5.4.39 The Bell Green neighbourhood is known for its out-of-centre retail park, including a superstore and other large format outlets, as well as their associated surface car parking. These retail uses are adjoined by the site of two former gas holders, which have now been dismantled. Some contemporary blocks of flats have been developed; however new development has generally been piecemeal.
- 5.4.40 The area is characterised by its green and open spaces, including waterways. The Pool and Ravensbourne rivers run north-south through the area. The Pool River, in particular, is a key feature and provides a valuable natural corridor, along with public access along the Waterlink Way. Beckenham Place Park, which is emerging as a key visitor destination, and has recently seen significant investment.
- 5.4.41 The great majority of the proposed allocations are uncommitted, in that they are neither consented nor is it the case that there are pre-application discussions at an advanced stage. Two require a sensitivity-led process in order to arrive at a density figure, namely: Former Bell Green Gas Holders and Livesey Memorial Hall (standard density revised down); and Worsley Bridge Road LSIS (revised up).
- 5.4.42 As discussed, there is the potential to achieve higher densities at the six Bell Green / Lower Sydenham (BGLS) sites under a BLE Phase 2 scenario, including the two stand-out large sites, namely Bell Green Retail Park and Sainsbury's Bell Green. Specifically, the sites are: 1, 2, 3, 4, 5, 6 from Figure 5.16.
- 5.4.43 Initial work has been completed to suggest that under a BLE Phase 2 scenario (also assuming London Plan Opportunity Area status and funds to deliver infrastructure upgrades beyond rail) there could be potential to triple the number of homes delivered in this area (i.e. a **200% uplift**); and given uncertainties it is also considered reasonable to explore a notional **100% uplift**.
- 5.4.44 In **conclusion** there is a need to explore the approach to growth in this area as a variable across the reasonable growth scenarios. Specifically, there is a reasonable need to explore both the approach to density that emerges following application of the Council's methodology and the **density uplift options** identified above.

Figure 5.16: Proposed south area allocations



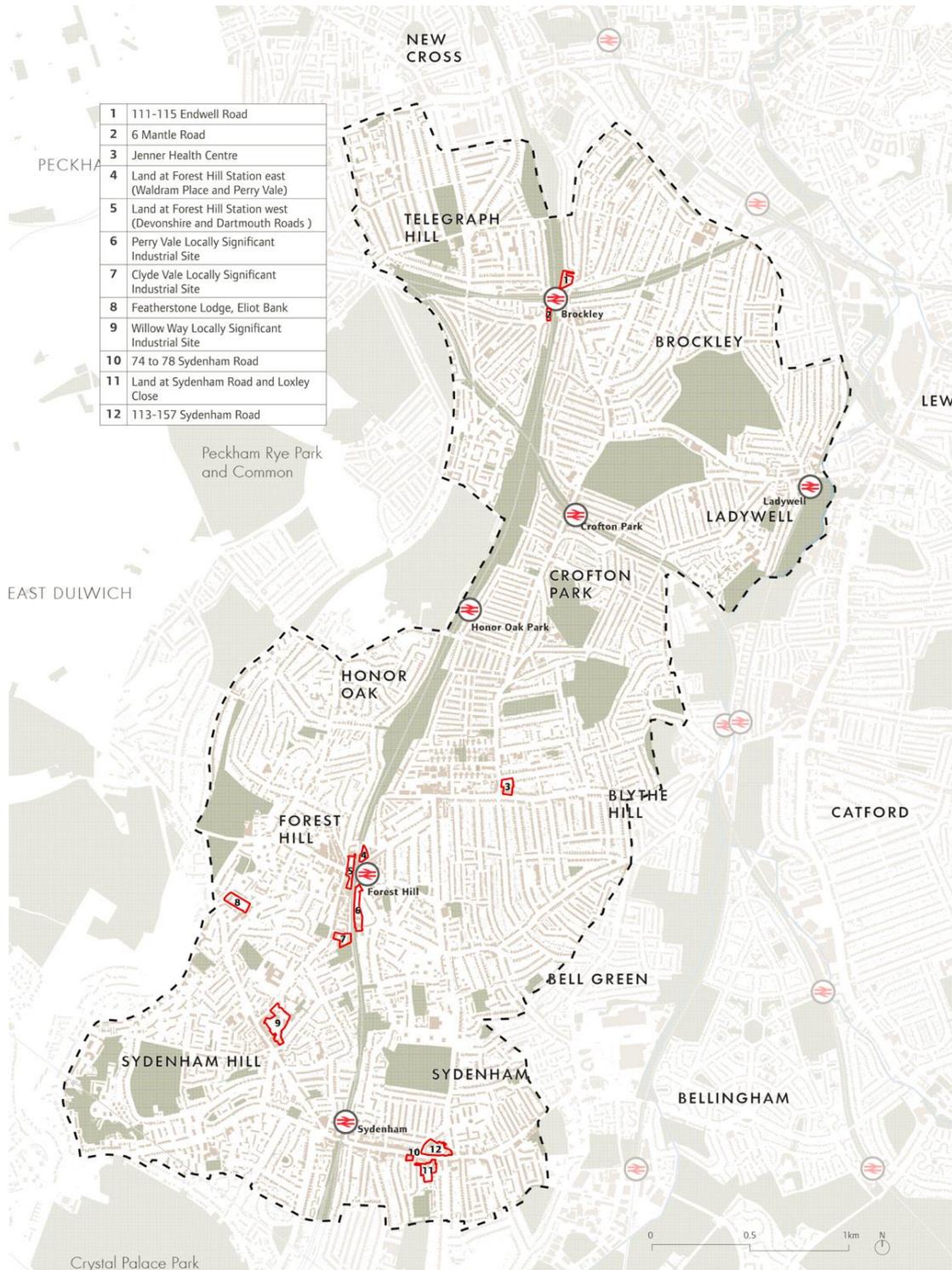
West sub-area

- 5.4.45 The area comprises nine distinct neighbourhoods, including: Telegraph Hill, Brockley, Crofton Park, Honor Oak, Blythe Hill, Forest Hill, Perry Hill, Sydenham, and Sydenham Hill. The area comprises a series of older villages that run north south, which developed around key railway stations.
- 5.4.46 The area is characterised by its topography and prominent green spaces with remnants of the Great North Wood. The railway line dissects the area and limits access between many neighbourhoods. The sidings and embankments also function as important habitat patches and biodiversity corridors. Whilst there are many parks and open spaces, the pedestrian and cycle links between these are varied.
- 5.4.47 The residential areas are predominantly low-rise with linear terraces and narrow street sections resulting in relatively high densities. The Western Area has a diverse built character that includes Victorian and Edwardian terraces, interwar 'garden city' inspired housing, post-war flats and council estates, and recent infill. The sub-area contains many conservation areas.
- 5.4.48 The district centres of Sydenham and Forest Hill have a diverse town centre offer and serve the wider neighbourhood. Some local centres (such as Ladywell) contain vacant and underused sites and have a poor quality public realm. The area has strong creative and digital industry clusters in Brockley and Forest Hill with links to Goldsmiths and Southwark College.

5.4.49 The majority of proposed sites are uncommitted, in that they are neither consented nor is it the case that there are pre-application discussions at an advanced stage. However, all bar two can safely be assigned a density figure using the standard methodology, as opposed to following a sensitivity-led process. Furthermore, BLE Phase 2 would not impact significantly on this area (whilst there would presumably be a BLE stop at Ladywell, there are no proposed allocations nearby (within this sub-area)) and there are no other strategic reasons for exploring higher density options.

5.4.50 In **conclusion** it is reasonable for the approach to growth in this area to be **held constant** across the reasonable growth scenarios. Specifically, it is reasonable to hold constant the approach to density that emerges following application of the Council’s methodology.

Figure 5.17: Proposed west area allocations



5.5 Establishing the reasonable growth scenarios

5.5.1 The final task was to explore ways of delivering the area-specific density uplift options in combination and determine those combinations that should be subjected to assessment (and consultation) as the reasonable growth scenarios. Table 5.5 summarises the sub-area options, serving to highlight that **the BLE is a prerequisite** for achieving an uplift in housing at all locations other than Catford.

Table 5.5 Summary of area-specific growth scenarios

Sub-area	Area	Potential to uplift growth over-and-above the baseline scenario ¹⁴
Central	Lewisham	The BLE (Phase 1) would enhance the PTAL, along with incentivising land assembly and site redevelopment, potentially leading to modest additional development opportunity (c.10%).
	A21 corridor	
	Catford	The baseline approach to density seeks to strike a balance between PTAL, regeneration objectives and constraints to tall buildings and is the direction of travel from the Catford Town Centre Masterplan. However, there is potentially the option of delivering a tall buildings cluster and, in turn, a c.20% uplift in homes delivered. This is not necessarily dependent on the BLE (Phase 2).
	Hither Green	No reasonable uplift option
North	New Cross area	The BLE (Phase 1) would enhance PTAL, along with incentivising land assembly and site redevelopment, potentially leading to modest additional development opportunity (c.10%).
	Elsewhere	No reasonable uplift option
East		No reasonable uplift option
South	Bell Green / Lower Sydenham (BGLS)	BLE (Phase 2) would greatly enhance PTAL and lead to significant additional development opportunity, potentially leading to a c.200% uplift in development densities. It is also considered appropriate to explore a c.100% uplift.
	Elsewhere	No reasonable uplift option
West		No reasonable uplift option

5.5.2 Combining these sub-area scenarios leads to **six growth scenarios**, which can be expressed either:

- in terms of a *baseline scenario*, involving indicative densities assigned to allocations as per the methodology set out in Table 5.3 (assuming no BLE) plus five higher growth scenarios defined in terms *percentage uplifts* on the baseline - see Table 5.6, Table 5.7 and subsequent maps; or
- in terms of the *total number of homes* delivered – see Table 5.8.

5.5.3 Box 5.2 recaps why these are the reasonable growth scenarios.

A note on other sources of supply

5.5.4 The growth scenarios vary in terms of the number of homes delivered through allocations only. However, other sources of supply over the plan period are from A) large delivered or consented sites that do not require an allocation; and B) small sites (both those that are delivered or consented, or those that can be anticipated to come forward as 'windfall'). With regards to (B), which in practice typically involves suburban infill, there is a need for an uplift on past rates (~350 annually) to 379 homes per annum, which is the target set by Policy H2 of the London Plan. In support of this, a Small Sites SPD was adopted in 2021, see: lewisham.gov.uk/myserVICES/planning/policy/adopted-local-plan/spds/small-sites-spd.

¹⁴ Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations, as per Table 5.3 (assuming no BLE).

A note on BLE assumptions

- 5.5.5 A key ‘driver’ of work to establish reasonable growth scenarios was recognition that the Council is continuing to work with the Mayor of London, Transport for London, adjoining local authorities and other key stakeholders to assess the potential impacts of BLE of supporting growth.
- 5.5.6 In turn, a key defining feature of the growth scenarios is the BLE assumption assigned to each. “No BLE” is the baseline assumption, but there is also a need to explore scenarios involving BLE Phase 1, which would extend to Lewisham, and BLE Phase 2, which would extend to Hayes via Lower Sydenham via potential stations at Ladywell and Catford Bridge.
- 5.5.7 It is recognised that the three BLE scenarios mean that the six scenarios are not all directly comparable, i.e. the six might alternatively be considered **three sets of two growth scenarios**. Uncertainty regarding the BLE creates an inherent challenge for local plan-making in Lewisham.

A note on spatial assumptions

- 5.5.8 Scenario 1 is the baseline scenario, i.e. a scenario involving the ‘baseline’ approach to assigning indicative densities to site allocations. The assumption, for the purposes of assessment, is that the uplift in homes under Scenarios 2 to 6 would be achieved by assigning higher indicative densities to certain of the proposed allocations (i.e. sites within New Cross, Lewisham, Catford and BGLS). However, it is only in BGLS where firm assumptions are made regarding the precise sites that would see higher densities (specifically, the Council is clear that all six of the sites in question could support higher densities under a BLE P2 scenario). Also, in practice, it is recognised that certainty regarding the BLE could lead to one or more new sites being made available and ultimately identified as suitable for allocation (for example, through the greater incentive for landowners to assemble and deliver sites), such that higher growth is delivered through additional sites instead (or in addition to) higher densities at the sites currently identified.

A note on sub-areas

- 5.5.9 To reiterate, there are five primary sub-areas within the Borough. However, for the purposes of IIA/ growth scenarios, it was considered appropriate to consider more fine grained sub-areas (Table 5.5).

Box 5.2 Summary explanation of the reasonable growth scenarios

Six reasonable alternative growth scenarios have been defined, and are the subject of assessment (Section 6) in light of the legal requirement to explore “reasonable alternatives” as part of the IIA process.

In order to understand the reasons for arriving at the reasonable growth scenarios there is a need to read Section 5 of this report as a whole, which describes a step-wise process (summarised in Figure 5.1).

In summary a three-step process was followed.

- The first step was to consider strategic issues/options (‘top down’ factors) in respect of: 1) housing quantum; and 2) and broad distribution.
- The second step was then to give ‘bottom-up’ consideration to: A) site options in contention for allocation; B) the approach to assigning an indicative density to each allocation; and C) the approach to assigning an indicative use mix to each allocation.
- The third step was to identify sub-area scenarios, and consider how these might be delivered in combination borough-wide, in order to form reasonable growth scenarios.

It is not possible to list out all unreasonable growth scenarios, but the following is a brief selection:

- Focus growth in the Opportunity Areas only – there are wide-ranging strategic objectives to be achieved through development of the identified site allocations outside of Opportunity Areas. Furthermore, there is a need to recall the stretching nature of the London Plan housing target, plus arguments for higher growth.
- Distribute growth more evenly across the Borough – this would involve higher densities and, in turn, taller buildings in locations that are relatively unsuitable for tall buildings. Also, the Opportunity Areas have been identified through the London Plan as suitable for concentrated growth and investment. Furthermore, the lack of identified potential development sites in some parts of the Borough compared to others (particularly in the East and West sub-areas), would significantly inhibit the deliverability of this approach.
- Meet LHN in full – a range of higher growth options have been identified; however, none would meet LHN in fully and most reasonable higher growth options are dependent on the BLE. Box 5.1 of the Interim SA Report (2020) explained: “The Council and AECOM will revisit the matter of closing the gap to LHN as far as reasonably possible subsequent to the consultation.” However, the current view is that there is a need to caution against planning for a level of growth in excess of the London Plan target in the absence of the BLE.

Table 5.6 The reasonable growth scenarios (summary)

Scenario	BLE assumption	Location for growth over-and-above the baseline*
1	No BLE	N/a
2		Catford (20%)
3	Phase 1	New Cross (10%); Lewisham (10%);
4		New Cross (10%); Lewisham (10%); Catford (20%)
5	Phase 2	New Cross (10%); Lewisham (10%); A21 corridor (10%); Catford (20%); Bell Green / Lower Sydenham (100%)
6		New Cross (10%); Lewisham (10%); A21 corridor (10%); Catford (20%); Bell Green / Lower Sydenham (200%)

Table 5.7 The reasonable growth scenarios (in terms of percentage uplifts on the baseline scenario)

BLE assumption		Approximate percentage uplift over-and above the baseline*					
		No BLE		Phase 1		Phase 2	
		Scenario	1	2	3	4	5
Allocations	New Cross	-	-	10%	10%	10%	10%
	Lewisham	-	-	10%	10%	10%	10%
	A21 corridor	-	-	-	-	10%	10%
	Catford	-	20%	-	20%	20%	20%
	Bell Green / Lower Sydenham	-	-	-	-	100%	200%
	Elsewhere in the Borough	-	-	-	-	-	-
Windfall		-	-	-	-	-	-
Total housing uplift		-	Increasing housing uplift →				

* Baseline describes a scenario whereby the Local Plan is adopted with a 'baseline' approach to assigning indicative densities to site allocations, as per Table 5.3 (assuming no BLE).

Table 5.8 The reasonable growth scenarios (in terms of total number of homes)

BLE assumption		No BLE		Phase 1		Phase 2	
Scenario		1	2	3	4	5	6
Allocations	New Cross	967	967	1064	1064	1064	1064
	Lewisham	3,752	3,752	4127	4127	4127	4127
	A21 corridor	444	444	444	444	488	488
	Catford	2,827	3,392	2827	3,392	3,392	3,392
	Bell Green / Lower Sydenham	1,641	1,641	1641	1641	3282	4923
	Elsewhere in the Borough	14,790	14,790	14,790	14,790	14,790	14,790
Other large delivered/consented sites		1,514	1,514	1,514	1,514	1,514	1,514
Small sites windfall ¹⁵		7,368	7,368	7,368	7,368	7,368	7,368
Total homes 2020/21 – 2039/40		33,303	33,868	33,775	34,340	36,025	37,666
Increasing growth →							

A note on possible supply beyond the plan period

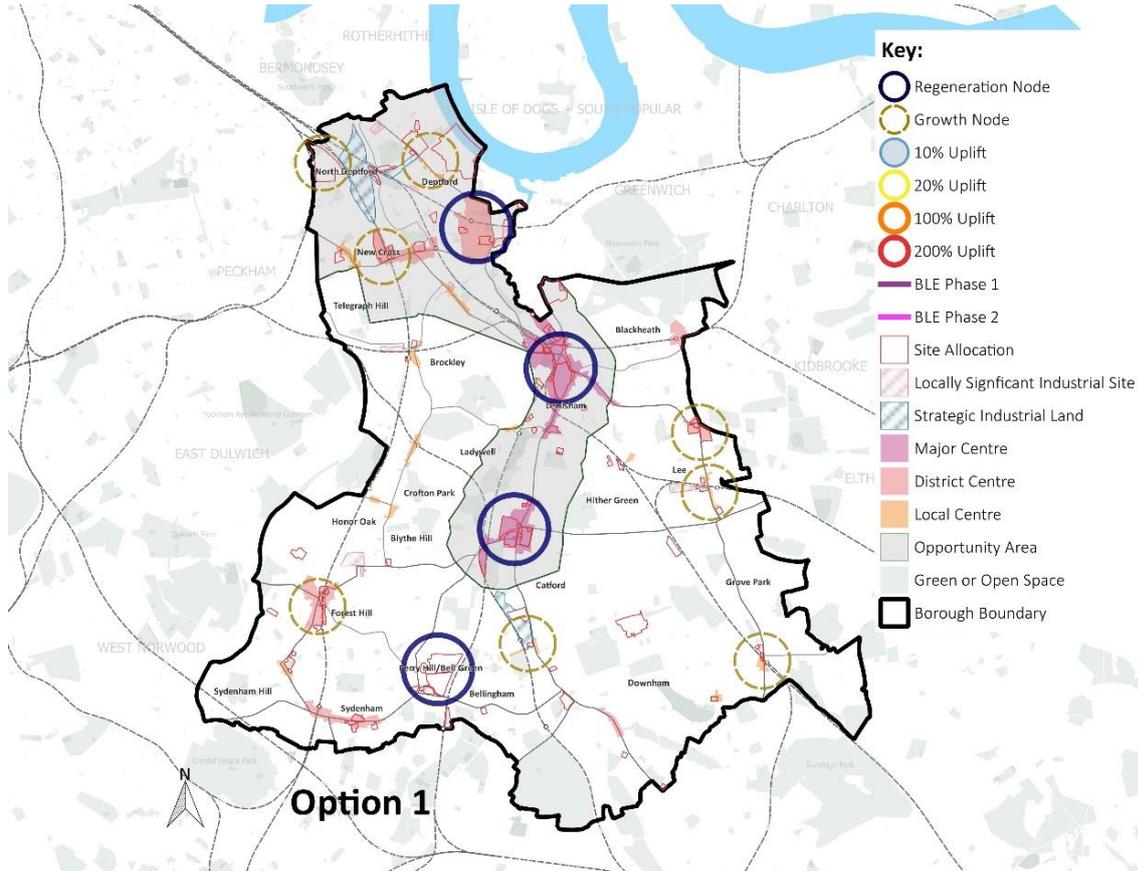
Under Scenarios 1 and 2, all allocations are anticipated to deliver in the plan period. With regards to Scenarios 3 to 6, whilst some sites could potentially come forward at higher densities once there is certainty that the BLE *will be delivered*, other sites (in particular at BGLS) might need to be delayed or phased so that they come forward once the BLE *has been delivered*. In turn, some of the growth might occur beyond the plan period, which does not give rise to a concern, given NPPF paragraph 22, which states: “Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments... form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years)...”

A note on the maps

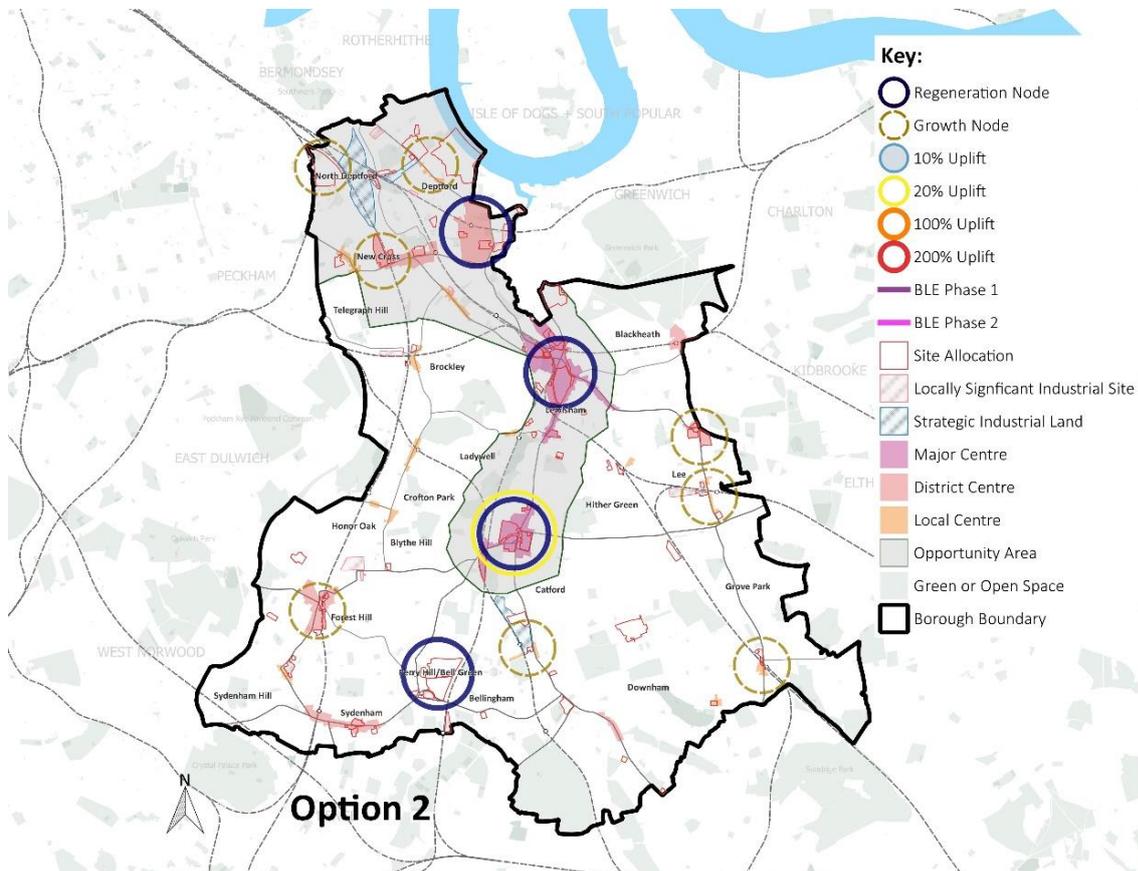
The maps presented below are unchanged from the Interim SA Report (2020). As such, the allocations presented on the maps are slightly out of date. Refer to paragraph 5.3.7 for changes to the site allocations. Site boundaries have also been amended for: Lewisham Gateway, Catford Island, Deptford Landings, Sun Wharf, Former Bell Green Gas Holders, Bell Green Retail Park, Endwell Road, Land at Forest Hill Station East and Land at Sydenham Road and Loxley Close. Up-to-date site red-line boundaries are shown across Figures 5.12 – 5.16.

¹⁵ Calculated as 133 homes for the year 2020/21 (i.e. the most recent monitoring year) plus 390 homes for the three subsequent years and then 379 homes for the remaining 16 years of the plan period.

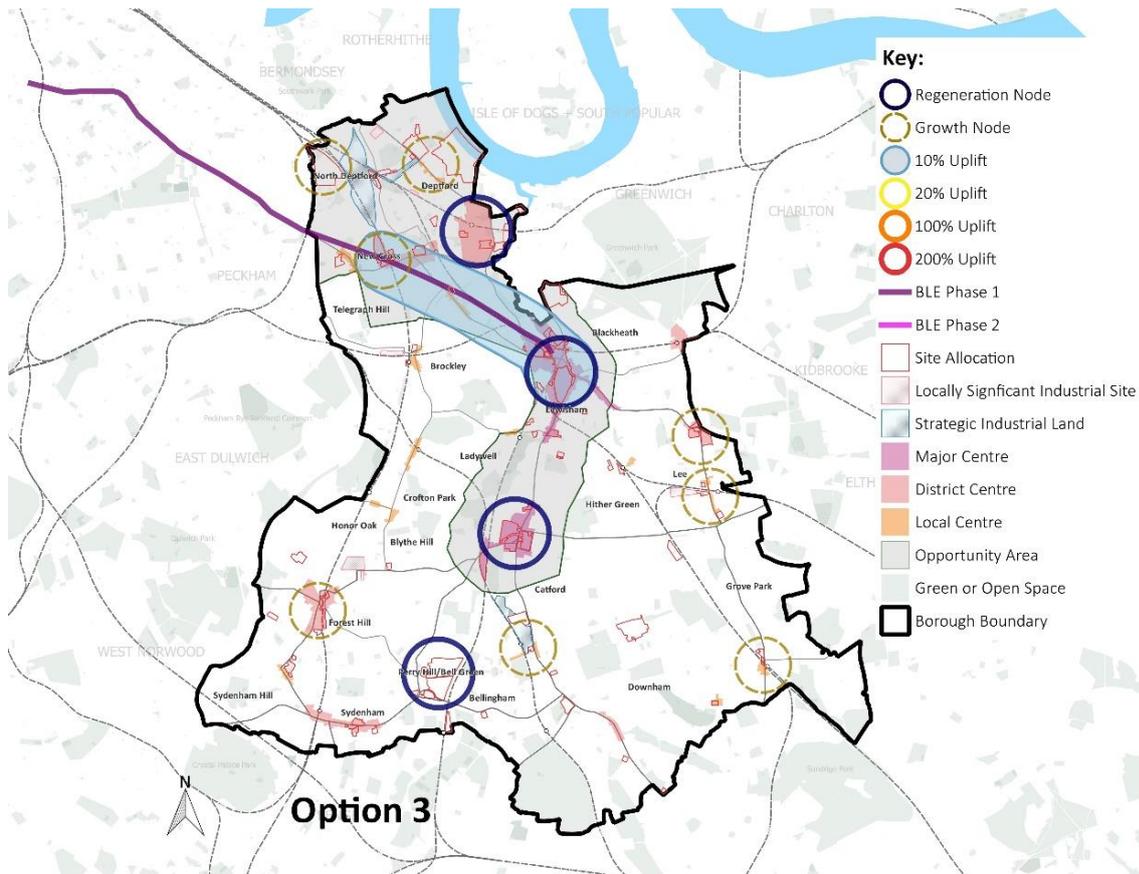
Scenario 1: No BLE; baseline approach to densities



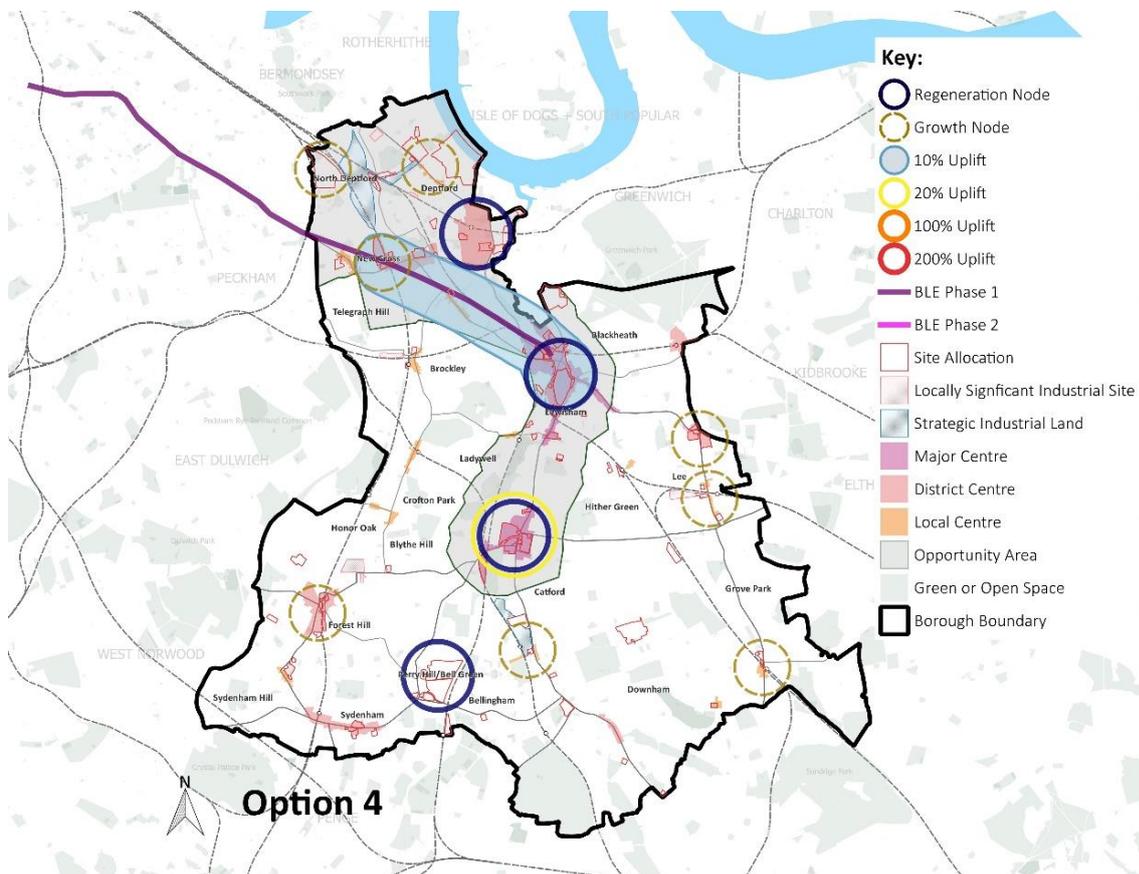
Scenario 2: No BLE; uplift at Catford (20%)



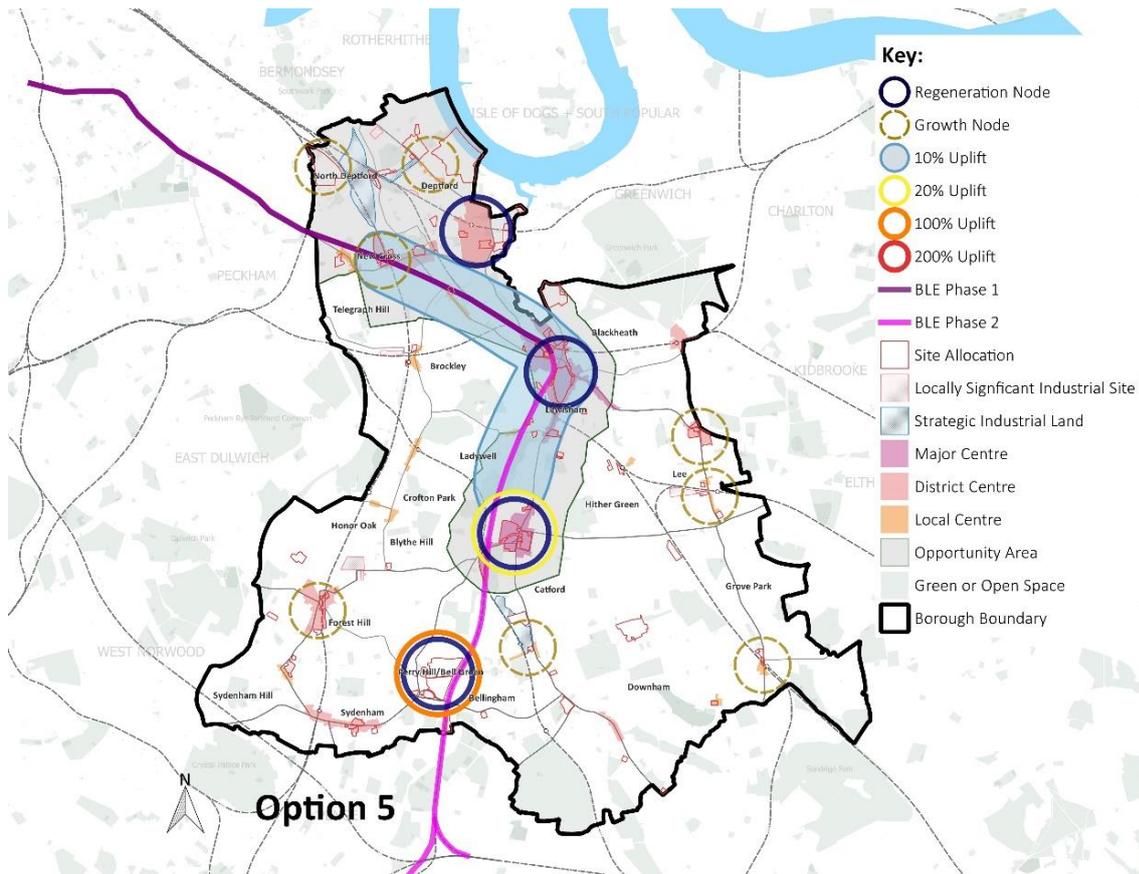
Scenario 3: BLE P1; uplift at New Cross and Lewisham (10%)



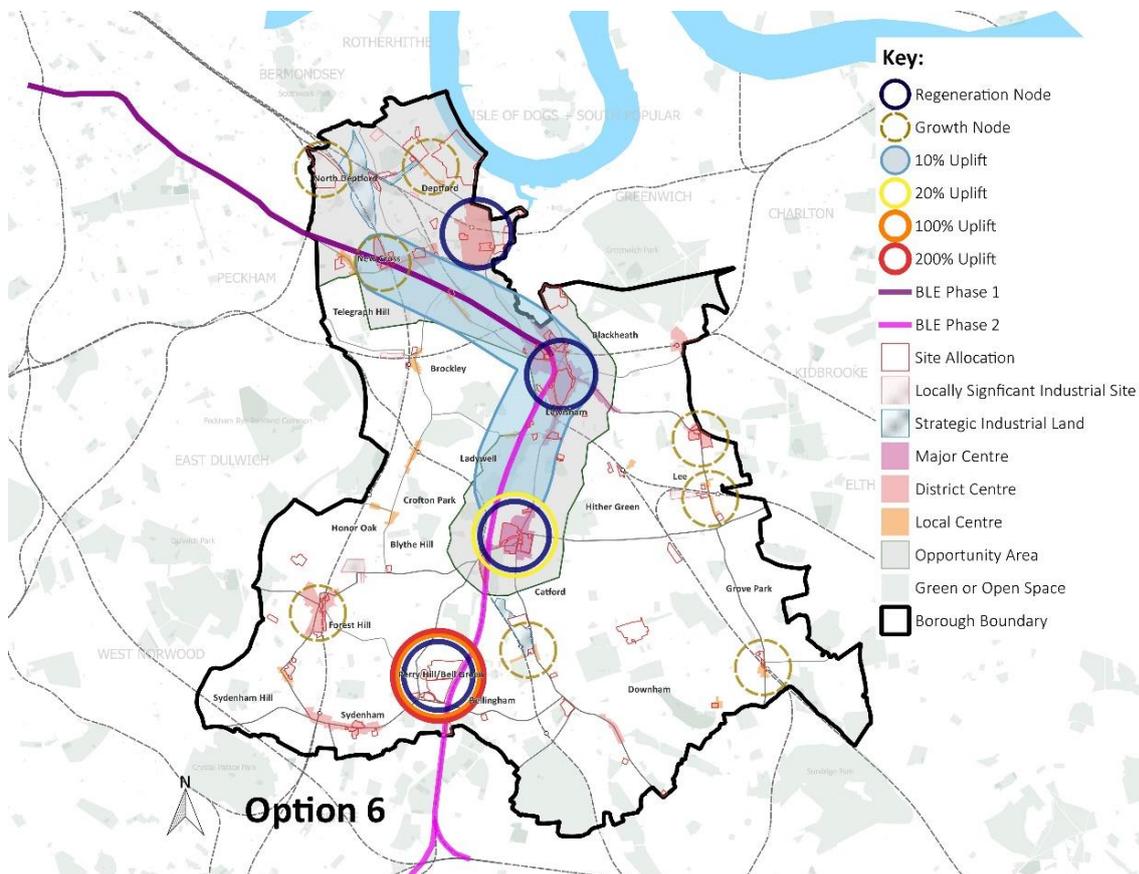
Scenario 4: BLE P1; uplift at New Cross and Lewisham (10%) and Catford (20%)



Scenario 5: BLE P2; uplift at New Cross and Lewisham (10%), Catford (20%) and BGLS (100%)



Scenario 6: BLE P2; uplift at New Cross and Lewisham (10%), Catford (20%) and BGLS (200%)



6 Growth Scenarios Assessment

6.1 Introduction

6.1.1 The aim of this section is to present an assessment of the growth scenarios introduced above.

6.2 Assessment methodology

6.2.1 Assessment findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the IIA framework) the columns to the right hand side seek to both: A) categorise the performance of each scenario in terms of 'significant effects', using **red** (significant negative effect), **amber** (moderate or uncertain negative effect), **no colour** (limited or no effect), **light green** (moderate or uncertain positive effect) and **dark green** (significant positive effect); and B) rank the scenarios in order of performance, where one (also highlighted by a gold star) is best performing. Also, '=' is used to denote where it not possible to differentiate the alternatives with any confidence.

6.2.2 Every effort is made to predict effects / differentiate the scenarios accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects / differentiate accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions this is made explicit in the assessment text.

6.2.3 Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the scenarios in combination with other planned or on-going strategic activities, including neighbouring Local Plans).

A note on BLE assumptions

6.2.4 It is important to note that the growth scenarios reflect three different BLE assumptions, namely no BLE in the plan period (Scenarios 1 and 2), BLE Phase 1 in the plan period (Scenarios 3 and 4) and BLE Phases 1 and 2 in the plan period (Scenarios 5 and 6).

6.2.5 It is fair to assume that a new BLE station (New Cross Gate and Lewisham under Phase 1; Ladywell, Catford Bridge and Lower Sydenham under Phase 2) would trigger a host of associated station upgrade work, infrastructure upgrades and investment, as discussed within the Bakerloo Line Economic Impact Assessment (2020), and recognising that current national rail stations would need to be upgraded to TFL standards. These upgrades are assumed *as part of the baseline*. It is not the aim of this IIA to assess BLE scenarios, reflecting the fact that a decision on the BLE will not be made through the Local Plan.

6.3 Assessment findings

6.3.1 Assessment findings are presented in the table below.

Table 6.1: Growth scenarios assessment (rank and effect categorisation)

BLE scenario		No BLE		BLE Phase 1		BLE Phase 2	
		Scenario 1: -	Scenario 2: Catford	Scenario 3: N' Cross Lewisham	Scenario 4: N' Cross Lewisham Catford	Scenario 5: N' Cross Lewisham A21 Catford LSBG	Scenario 6: N' Cross Lewisham A21 Catford LSBG+
Locations for 'above baseline' densities							
Topic							
Air quality and other pollution		3	4	3	4	2	★1
Biodiversity and green infrastructure		★1	3	2	4	5	6
Climate change adaptation		★1	2	3	4	5	6
Climate change mitigation		5	4	4	3	2	★1
Communities	Accessibility	3	3	3	3	2	★1
	Housing	5	4	4	3	2	★1
	Other issues	=	=	=	=	=	=
Economy		5	4	4	3	2	★1
Historic env, heritage, character and culture		★1	3	2	4	5	6
Land and natural resources		=	=	=	=	=	=
Transport		3	4	3	4	2	★1

Discussion

The assessment matrix above shows a mixed picture, with Scenario 1 performing well in certain respects (notably biodiversity, climate change adaptation (flood risk) and historic environment) and the “higher growth with BLE” scenarios performing well in other respects (notably air quality, climate change mitigation, accessibility, housing and transport). Scenario 2 which would involve an uplift in homes without the BLE is found to perform poorly in respect of all IIA topics other than ‘housing’.

Having made these initial points, set out below is a discussion under the eleven topic headings:

Air quality and other pollution

There are currently six AQMAs in Lewisham, comprising a blanket AQMA covering the north of the Borough (north of the A205 South Circular) together with AQMAs along major roads in the south. Higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4) would see new housing at densities considerably above that which application of the London Plan Strategic Housing Land Availability Assessment (SHLAA) standard methodology would suggest is appropriate, which potentially gives rise to a concern in respect of generation of private car movements;. However, growth would be delivered in the context of the Catford Town Centre Masterplan, which is exploring means of enhancing walking and cycling opportunities in the area and maximising the town centre offer (thereby minimising need to travel). Notably, realignment of the South Circular (A205) will address existing issues of severance and pollution, and another key opportunity is in respect of improving public access to the Waterlink Way by repairing the existing break in the path and extending the route to join with the River Pool Linear Park. A higher growth strategy could potentially assist with achieving these objectives.

With regards to **BGLS**, there is cautious support for a higher growth scenario (Scenario 6) from an air quality perspective. PTAL would be high given BLE P2 and there could be potential to deliver a new local centre with a considerable offer, which could go some way towards addressing current poor accessibility locally, which is associated with high car dependency. Growth could also facilitate investment in walking / cycling infrastructure (with major interventions to improve permeability across the Bell Green Gyratory, including through redevelopment of the Stanton Square LSIS), the urban realm, river re-naturalisation / greenspace and links between greenspaces (notably the Pool River, Beckenham Place Park and Crystal Palace), helping to address existing issues that dissuade people from walking/cycling and, in turn, supporting reduced car movements. However, there would be a need to ensure that the new centre does not compete with Catford, affecting its role as a higher order centre. In this regard, a preliminary assessment suggests a Local Centre is appropriate in terms of function and scale, and should principally serve demands generated by new development.

With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, there are limited implications, recognising that the uplift in densities would be in response to an increase in PTAL following the BLE. The A21 corridor, between Lewisham and Catford, is associated with a notable opportunity in respect of supporting walking / cycling, with the ambition being both to enhance the principal north-south route and develop a complementary network of legible, safe and accessible routes, including cycling Quietways, that link with the A21, enhancing connections between neighbourhoods and key destinations, including open spaces. However, it is difficult to conclude that a marginally higher growth strategy will have a significant bearing.

In **conclusion**, there is support for Scenarios 5 and 6, which would see BLE P2 alongside an uplift in development densities at Catford and BGLS, and there is a degree of concern associated with support for higher development densities at Catford in the absence of BLE P2 (Scenarios 2 and 4). There is insufficient evidence at this stage to enable a conclusion of significant negative effects, but this is uncertain, i.e. there is some risk.

Biodiversity and green infrastructure

As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher densities at the same package of sites that would deliver Scenario 1, as opposed to through additional allocations, which potentially serves to reduce concerns in respect of higher growth scenarios conflicting with biodiversity and green infrastructure objectives. However, certain concerns still remain, recognising that higher density development can mean less space available within site boundaries for green and blue infrastructure.

This is particularly a concern on account of the fact that the central spine and transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley, associated with the Rivers Ravensbourne and Pool, and is associated with a network of linked greenspace; indeed, it is identified as a strategic green infrastructure corridor by the All London Green Grid Framework. Issues associated with higher growth in proximity to the river corridors are discussed further below, but suffice to say here that there are issues / challenges associated with certain sites at Lewisham, along the A21 corridor, at Catford and at Bell Green. However, on the other hand, growth can support investment in green infrastructure, e.g. a high growth strategy at BGLS could support the aspiration to enhance the South East London Green Chain, which is a GI corridor that skirts the southern edge of this area; and growth at Catford should assist with realising opportunities to deculvert and naturalise the River Ravensbourne. These opportunities are potentially highly significant.

In **conclusion**, it is appropriate to highlight lower growth scenarios as preferable *on balance*, given risks associated with intensification along river corridors (also in proximity to railway embankments and cuttings, which are often designated as a Site of Importance for Nature Conservation, SINC) although there is *much uncertainty* in light of growth related opportunities, e.g. river re-naturalisation. Also, there is uncertainty on the basis that lower growth in Lewisham could lead to increased pressure for housing elsewhere. For these reasons significant negative effects are not predicted for the higher growth scenarios.

Climate change adaptation

In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that would see incrementally **higher growth** under Scenarios 2 to 6 is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone.

At **Catford** a key site is Wickes and Halfords, Catford Road, which is located between railway lines and with the River Ravensbourne cutting diagonally through the site to the north in a covered channel. Residential uses would not be likely at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain.

In the **north of the Borough**, in **Lewisham** and along the **A21** corridor flood risk zones intersect a number of proposed allocations. However, the great majority either have planning permission or are at an advanced stage of pre-application discussions, such that there is no assumption of higher density development under the higher growth scenarios; indeed, the only non-committed site at risk and proposed for residential is Lewisham Shopping Centre (Molesworth Street Car Park was previously proposed as an allocation, but has now been removed).

At **BGLS** the eastern part of the proposed Bell Green Retail Park site, which would deliver a significant proportion of the additional growth under Scenarios 5 and 6, intersects fluvial flood risk zone 2, associated with the adjacent Pool River, and the Worsley Bridge Road LSIS skirts flood zone 3 (with the site notably falling between the railway line and the river, in a similar fashion to Wickes and Halfords, Catford Road). However, it is difficult to assume that higher growth scenarios (i.e. Scenarios 5 and 6) would lead to increased pressure to deliver homes in (or adjacent to, recalling the need to make allowances for climate change in the long term) the flood risk zone.

In **conclusion**, whilst limited concerns were raised through consultation in 2020, it remains appropriate to conclude an “uncertain significant negative effect” for all scenarios, and to highlight a particular concern with higher growth scenarios, under which there *could* be less potential to leave areas at risk undeveloped. N.B. another climate change adaptation consideration relates to overheating risk in tall buildings.

Climate change mitigation

Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising **per capita emissions from the built environment**. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network. Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means proximity to a strategic heat source (which can be a source of ambient heat, given heat pump technologies) and/or a facility with a major demand for heating (also potentially cooling), such as a civic building; there is also a need to support strategic-scale mixed use schemes that achieve economies of scale and lead to a mixed and balanced heat/cooling demand profile.

This serves to suggest merit in **higher growth** scenarios, noting that all of the growth locations in question, with the exception of the A21 corridor, are associated with strategic sites (e.g. in excess of 500 homes) and/or site clusters that might feasibly support one or more heat networks. In particular, there is a good degree of certainty regarding the potential to deliver a heat network in **Catford**, where the Lewisham Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstan’s College Jubilee Grounds. Also, in **Lewisham** (albeit the assumption under Scenarios 2 to 6 is only a modest 10% uplift in homes), the Energy Masterplan finds there to be a considerable opportunity: *“The redevelopment of the shopping centre, if realised, provides a catalyst to develop a future electrified heat network that will decarbonise and extend the existing networks in the area [which currently draw from CHP, which is no longer a low carbon technology in light of grid decarbonisation]... Heat supply opportunities include heat pumps (air source or the river) as well as heat recovery from cooling systems at the commercial areas and the Riverdale data centre.”* Higher growth at **BGLS** (Scenarios 5 and 6) also represents a clear opportunity, as this is a relatively unconstrained area and there will be the potential to link a mix of uses including employment; however, this opportunity is not examined by the Energy Masterplan. At **New Cross**, it is unclear whether a connection to the South East London Combined Heat and Power Station could be achieved, but there could be a heat network opportunity regardless (although no opportunity is highlighted in the draft Area Framework published in 2019).

In **conclusion**, there is considerable support for all higher growth scenarios as the effect could be to realise opportunities to deliver heat networks. With regards to effect significance, one hand there is a need to recognise the urgency of supporting major interventions in support of climate change mitigation, as reflected in the Borough’s declaration of a Climate Emergency; however, on the other hand, climate change mitigation is a global issue such that it is difficult to conclude that local actions will result in a significant positive effect.

Communities 3 (Accessibility)

There are areas in the Borough experiencing multiple deprivation that could benefit from the investment associated with new development, particularly in terms of delivering new and enhanced infrastructure, including community infrastructure, and employment opportunities. The importance of delivering new and enhanced green infrastructure is also not to be under-estimated, particularly in light of the lock-down experience of 2020.

Higher growth at **BGLS** (Scenarios 5 and 6) represents a particular opportunity in this respect, recognising that this area falls within the defined Strategic Area of Regeneration that covers the south-eastern part of the Borough. The BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a 'dramatic rise' in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and-above those envisaged by the LEIA. It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA. A tall buildings cluster could bring with it a new local centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which might potentially form part of a new Regional Park in the future) a short distance to the south. One of the proposed allocations - Sydenham Green Group Practice - does comprise an existing large health centre; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure, linked to the public sector estate programme.

With regards to **Catford**, which is associated with a notable concentration of multiple deprivation, the proposal under Scenarios 1 and 3 is to assign indicative residential densities to the four sites within the Catford Town Centre Masterplan area that accord with existing levels of public transport accessibility, on the basis that this will be supportive of wide ranging regeneration objectives. There could potentially be benefits associated with a higher growth strategy; for example (and in particular), a higher density scheme at Catford Shopping Centre and Milford Towers could help to ensure that net losses of main town centre uses (currently 13,699 m²) are minimised (recalling that the proposal is to re-provide main town centre uses within this location such that these uses comprise 33% of the total floorspace of the redevelopment scheme – see paragraph 5.3.17, above). However, benefits of a higher growth strategy for Catford are uncertain, as there is a need to consider the town centre's particular character and role, with its focus on civic and cultural functions, and its relationship with nearby Lewisham. The BLE LEIA (2020) discusses wide ranging opportunities that would result from a BLE station (also noting that realignment of the South Circular can be assumed, as it has Government funding), but it is difficult to conclude that benefits would be realised more fully or enhanced under a higher growth scenario.

There are also opportunities associated with the **A21 corridor**, where the aim is to transform the main road corridor and its environs into a series of liveable and healthy neighbourhoods. Particular opportunities include delivery of cycling Quietways and better linking neighbourhoods to large open spaces. However, it is difficult to suggest opportunities associated with a slightly higher growth strategy (Scenarios 5 and 6). In **Lewisham** a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme (450 dph, reflecting high PTAL) that will ensure a net gain in main town centre uses (currently nearly 45,000 m²), and there could be benefits to a modestly higher density scheme still (10% uplift) to secure a further net gain in town centre uses.

In **conclusion**, numerous proposed allocations will deliver enhancements to community infrastructure, green infrastructure, transport infrastructure or the urban realm. The assessment in 2020 predicted significant effects with 'a degree of uncertainty', but there is now improved certainty, with a good degree of support shown for the spatial strategy, from an accessibility / communities / regeneration perspective, through consultation in 2020. Scenarios 5 and 6 perform particularly well, as there is a particular opportunity in the south of the Borough. However, there remains a degree of uncertainty regarding effect significance ahead of masterplanning for BGLS.

Communities 2 (Housing)

Scenario 1 would enable the housing target to be set *at least* at the London Plan housing target (1,667 dpa), whilst under **higher growth** scenarios there would be the potential to set the housing requirement at a higher figure - and so meet housing needs more fully, including for affordable housing (see Section 5.2) – although there would also be a need to consider a larger 'supply buffer' to reflect increased delivery risks / uncertainty regarding delivery trajectories. For example, and notably, at BGLS growth might well need to be delayed or phased to coincide with delivery of the BLE, plus there would be a need for a masterplanning exercise.

In **conclusion**, it is appropriate to place the growth scenarios in an order of preference according to development quantum. With regards to effect significance, all of the scenarios would lead to significant positive effects on the basis that the London Plan target would be met. It is also important to recall that an aim of the local plan is to put in place a positive development management framework to secure an increased rate of windfall supply.

The spatial strategy does also potentially have implications for other 'housing' related matters. However, these are considered to be of secondary importance, relative to the matter of total housing quantum. One important consideration is that which is a focus of the BLE LEIA (2020), namely that under BLE scenarios (Scenarios 3 to 6) house prices locally will increase in the vicinity of BLE stations, thereby leading to more residents in need of **affordable housing** which, in turn, suggests support for higher growth strategies (i.e. Scenarios 4 and 6 over Scenarios 3 and 5). The LEIA identifies a particular issue in Catford, stating: *"Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing."*

Communities 3 (other issues)

There is a pressing need to reduce **inequality** and address pockets of **relative deprivation** in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. Issues are particularly acute within the Strategic Area of Regeneration (SAR), which has the potential to benefit from a higher growth strategy (Scenarios 5 and 6), as has been discussed above. The BLE LEIA (2020) is supportive of the BLE to Lower Sydenham, including because the area *"has seen the largest increase in the number of claimants in the Corridor by a significant margin - a 21% increase in claimants is over 5 times the Corridor average"*, and it is fair to suggest that benefits would A) extend beyond the immediate station environs (the area which is the focus of the LEIA) and B) would be enhanced under a higher growth scenario. Specifically, a higher growth scenario could support some or all of the following SAR priorities discussed within the Draft Plan:

i. Enhancing provision of and access to high quality public transport infrastructure, including bus services; ii. Addressing barriers to movement by enhancing the network of walking routes and cycleways connecting to transport nodes, town and local centres, schools and training facilities, and employment locations; iii. Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people; iv. Support the vitality and viability of town and local centres, helping to ensure they make provision for a wide range of accessible shops and services; v. Improve the environmental quality of neighbourhoods, including by reducing and mitigating air and noise pollution along main roads and junctions."

Issues are also relatively acute in Catford, with the BLE LEIA explaining that: *"Levels of deprivation rapidly increase when moving south through the BLE Corridor from Lewisham/Ladywell into Catford."* Again, there may be growth related opportunities to address relative deprivation (Scenarios 2, 4, 5 and 6). However, there are also significant tensions, noting the potential to price-out sectors of the existing population and small businesses, which would need to be addressed by way of targeted provision of affordable housing and workspace.

Access to high quality community infrastructure is critical and has been discussed above under the **'Accessibility'** heading, as has the related matter of improving access to transport infrastructure and improving the quality and permeability of the urban realm. Another closely related matter is access to green infrastructure, which has also been discussed above, under **'Biodiversity and green infrastructure'**. The discussion under both headings highlights issues and opportunities associated with higher growth scenarios at Catford and BGLS.

Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the **'Housing'** heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups, who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.¹⁶ Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

Air and noise pollution is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts) including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects.¹⁷ Addressing the quality of the urban realm in Lewisham and (in particular) Catford, and also along the A21 corridor, is a focus of discussion above, including in respect of access to rivers and open space. Also, and more generally, there is a focus nationally on achieving high standards of masterplanning, design and place-making; for example, a recent report (April 2022; see resiliencebrokers.org/project/key-cities) called for a new **health-focused** approach to town planning, specifically: *"One that moves away from having the delivery of housing numbers at its core, and replaces this with a holistic vision of health. Affordable, quality housing is still a critical issue of course, but it is one in an array of conditions necessary to support good health."*

Further key considerations relate to the **Economy**, as discussed below. One key consideration is avoiding loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being “*characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.*”

Another more discrete consideration relates to the accessibility of the public realm for those with **mobility** issues, including the disabled and the parents of young children. ‘Healthy Streets’ is a focus of analysis within the BLE LEIA (2020), with numerous opportunities to the BLE to lead to accessibility improvements to stations and their environs (amongst other things that contribute to Healthy Streets), including step free access at Catford and Ladywell. However, benefits are likely to accrue due to the BLE more so any decision to support higher growth.

Beyond these considerations there are wide-ranging issues to be addressed by the Local Plan. However, it is a challenge to identify any that relate strongly to the spatial strategy. Other key issues can be addressed through policy on matters such as use mixes in town / district centres, and through site specific policies that deal with use mixes, infrastructure delivery and design. These matters are largely independent of the spatial strategy, i.e. it should be that issues can be addressed and opportunities realised under any reasonably foreseeable scenario.

As such, and in **conclusion**, the growth scenarios are judged to perform broadly on a par, on the basis that there are so many cross-cutting issues of relevance. There is an argument for predicting significant positive effects; however, taking a precautionary approach, significant positive effects are not predicted. Whilst growth scenarios perform well in terms of certain of the cross-cutting issues, there are also tensions.

Economy

By planning to meet employment needs the Local Plan can help to address the challenges facing high streets, assist in growing key sectors and clusters, and ensure that there is a range of employment opportunities available locally, including for those with lower education and skills within the Strategic Area of Regeneration.

Focusing on the growth scenarios, one immediate consideration relates to the implications of **higher growth** strategy for employment land provision and the effective mixed use redevelopment of existing employment sites. There are several proposals to redevelop existing Locally Significant Industrial Sites (LSIS), including two proposals at BGLS, namely at Stanton Square and Worsley Bridge Road. Focusing on Worsley Bridge Road, the assumption is that employment land will comprise 60% of total floorspace after redevelopment (an increase from the 33% proposed at the Regulation 18 Draft Plan stage), which would mean that there is a net loss of employment space on site under Scenarios 1 to 4, but this loss could be mitigated under the higher growth scenarios (Scenarios 5 and 6) and there could even be a net gain in terms of total employment floorspace (because a higher density scheme will involve more homes / residential floorspace and, in turn, more employment floorspace). Maximising total employment floorspace is important, in light of the Employment Land Study (2019) target of delivering deliver circa 1,000 m² new B-class employment land per annum.¹⁸ It is also important in light of local economic objectives around supporting micro and small sized businesses in target industries, particularly within the cultural, creative and digital sector, which will tend to be well suited to operating from higher density mixed use developments, for example a high density scheme at Worsley Bridge Road LSIS under a BLE P2 scenario. However, there is also a need to give consideration to more qualitative matters, namely the precise type and nature of B-class space that is provided and, in turn, question whether the types of light industrial uses currently on-site will be able to continue to operate following higher density mixed use development. This is an important consideration, given trends across London for light industrial uses to move outwards and out of London (see figure below); and there is a need to consider implications for those who rely on existing ‘industries at risk’ for employment, who might be geographically clustered and/or tend to be at risk of unemployment (see further discussion in Appendix IV). Having said this, in the case of the two LSIS in the South of the Borough proposed for mixed use redevelopment (at a higher density under Scenarios 5 and 6), it is recognised that this area is associated with high industrial vacancy rates.¹⁹

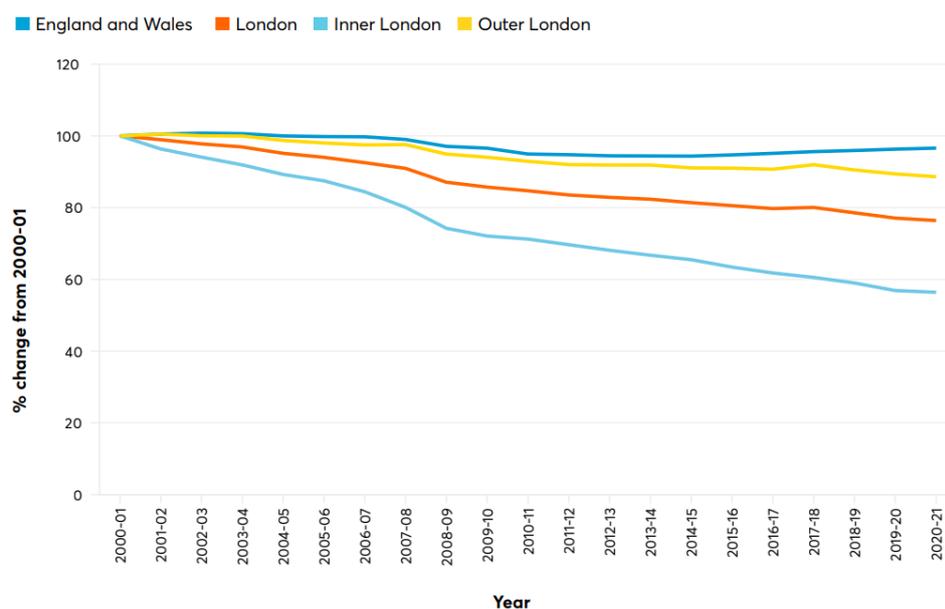
¹⁶ See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

¹⁷ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

¹⁸ Importantly, this target was set having taken into account recent and forthcoming losses of (underused and vacant) employment land as part of regeneration in the North of the Borough facilitated by the Core Strategy (2011). In particular, the committed Convoys Wharf MEL scheme will lead to a net loss of 44,500 m² B-class floorspace, whilst the committed Timber Yard, Deptford Wharves at Deptford Landings MEL (Oxestalls Road) and Scott House scheme will lead to a net loss of 10,787 m².

¹⁹ The BLE LEIA states: “*Conversely to the trend across the rest of the Corridor and trends across London, industrial rental values have decreased in recent years in Lower Sydenham. This could be a result of the high industrial vacancy rates that have been common in the area over the last 10 years due to the large supply of industrial space in this outer London location.*”

Change in industrial floorspace over time (Centre for London, 2022; available [here](#))



Source: VOA (2021). Non-Domestic Rates. Table FS4.1: Industrial sector - total floorspace by administrative area. data to 31 March 2021.²⁴

Having made these points regarding risks to existing employment sites, it is also important to consider implications for delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The BLE LEIA (2020) is strongly supportive of the BLE in respect of the potential to enhance the economy of New Cross Gate, Lewisham, Catford and BGLS, and it may be that opportunities can be more fully realised via support for **higher growth** scenarios through the Local Plan. Focusing on Catford and BGLS, both locations are associated with low levels of employment in knowledge industries (3% for Lower Sydenham, compared to 16% for Lewisham and 32% for London), which is certainly an issue to be addressed. The downside can be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *“Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase...”* However, it is fair to assume that higher growth scenarios would be supportive of increased delivery of affordable workspace, with the LEIA suggesting: *“The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate.”* For Catford, the LEIA also suggests: *“extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses.”*

Laurence House and Civic Centre is a key proposed town centre allocation, in that it currently supports 18,700 m² employment floorspace. The rationalisation of older office stock may result in net loss of employment floorspace with redevelopment; however, this could be minimised / offset via a higher density scheme, which might also be supportive of wider objectives to deliver a new dedicated ‘employment quarter’ within Catford town centre providing a wide mix of business units. In a similar fashion, higher densities in the New Cross area (10% uplift under Scenarios 3 to 6) are supported as the effect would be to deliver additional employment land and workspace in the north of the Borough, which will help to meet identified needs, and compensate for a large net decrease in employment land over the plan period due to losses incurred through already consented schemes.

In **conclusion**, there is support for higher density schemes that will deliver additional employment floorspace, including low cost and affordable workspace suited to small and micro-sized businesses in important industries/sectors. Furthermore, under Scenarios 5 and 6 there is potential to transform the local economy of the BGLS area (although there is a need for work to explore the strategic role of an employment hub here). However, there is a degree of risk associated with mixed used redevelopment of existing employment sites under higher growth scenarios, in that provision of space for existing or future light industrial uses could be compromised or prove challenging to deliver. For this reason, uncertain positive effects are predicted.

Historic environment, heritage, character and culture

Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough’s varied history, which the Lewisham Characterisation Study (2019) breaks down into six periods: Ancient Lewisham (pre-1700s); Town and country (1700-1800); Unlocking the south (1800s-1850s); Rise of the commuter suburbs (1860-1914); Interwar (1915-1949); and Rebuilding Lewisham (1950s onwards). Settlement firstly followed the river valley as far as Catford, before higher land was developed in the mid-1800s.

Higher density development under **higher growth** scenarios can inevitably lead to tensions with objectives relating to the historic environment and character, including on the basis that tall buildings can sharply contrast with historic townscapes. Notably, the Tall Buildings Study (2019) identifies a number of areas “*characterised by very consistent building heights*” and notes that such areas could have particular sensitivity to tall buildings.

In this context, **Catford** is found to be more sensitive to tall buildings than the other locations under consideration here. A key consideration is the distinctive character of The Broadway, and the buildings of townscape merit that line it (albeit there is only one listed building – the grade 2 listed theatre). Another consideration is the adjacent and expansive Culverley Conservation Area, which is an Edwardian suburb.

The **A21 corridor** is also sensitive, albeit the proposal under Scenarios 5 and 6 is to deliver only modest higher densities. In particular, Ladywell Play Tower is associated with several listed buildings and accessible via the Waterlink Way, which links with Ladywell Fields. However, the site is at the pre-application stage, and the specific proposal is for residential to facilitate enhancement of the Ladywell Baths, which are on the Heritage at Risk Register. Also, PLACE/Ladywell (former Leisure Centre) is adjacent to St Mary’s Conservation Area, and the latest proposal is for a more modest scheme than that envisaged at the Draft Plan stage.

Conversely, Lewisham, New Cross and BGLS give rise to more limited concerns, in respect of higher densities. However, that is not to suggest that these areas are without constraint. At **Lewisham** several sites are assigned indicatively lower densities under Scenario 1 on the basis that they are associated with the transition between the town centre and neighbouring residential areas. At **BGLS** there is a need to consider: the cluster of listed buildings / structures associated with Livesey Hall War Memorial, which is adjacent to the west of the gas holders site; the character of the Bellingham Estate to the east (influenced by ‘garden city’ principles); and locally important buildings within the Stanton Square LSIS site, including a well-preserved art deco building. Finally, it is important to note that an archaeological priority area follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement. It is difficult to conclude; however, that higher density development 2 to 6 leads to any concerns.

In **conclusion**, there are concerns associated with higher densities at all of the locations in question, and particular concerns in respect of a tall buildings cluster at Catford. Significant negative effects are predicted for the worst performing scenarios; however, there is much uncertainty, e.g. recognising the potential for effective masterplanning and design to address heritage constraints and potentially realise opportunities.

Land and natural resources

As discussed, the assumption is that higher growth under Scenarios 2 to 6 would be achieved via higher density development within the same package of sites that would be allocated under Scenario 1, hence there are limited concerns in respect of ‘land’. A Metropolitan Open Land Review has been completed, including with a view to exploring the potential to release a small area of MOL to deliver a realigned South Circular at Catford; however, the spatial strategy alternatives are not likely to have a bearing on this matter. Another consideration relates to minimising waste, ensuring good waste management and supporting a more circular economy, e.g. with building reuse ahead of demolition, as far as possible. However, it is again not possible to draw meaningful conclusions. In **conclusion**, all scenarios are considered to perform on a par, and broadly neutral effects are predicted.

Transport

Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford.

As discussed above under ‘air quality’, a matter of potential overriding importance is matching development densities to PTAL, and on this basis it is appropriate to highlight a degree of concern associated with higher growth at **Catford** in the absence of BLE P2 (Scenarios 2 and 4), albeit there is uncertainty as Catford town centre has an excellent PTAL, and higher growth could be carefully masterplanned. With regards to **BGLS**, as discussed under ‘air quality’ and ‘accessibility’, there is cautious support for higher growth scenarios (Scenarios 5 and 6) from transport perspective, although there is uncertainty ahead of masterplanning work. With regards to scenarios involving marginally higher growth at **New Cross, Lewisham** and the **A21 corridor**, it is difficult to conclude that a small uplift in the number of homes delivered would lead to any notable issues or opportunities.

In **conclusion** (and recalling that the aim of this assessment is not to assess the effect of BLE expansion options, but rather the effect of Local Plan options under three BLE scenarios) the scenarios perform as per the discussion under ‘air quality’, above. Moving forward, there should ideally be a re-examination of spatial growth scenarios on the basis of a firm assumption regarding BLE delivery, in order to ensure that the Local Plan responds most appropriately to future PTAL and directs growth so as to fully realise opportunities.

7 Developing the preferred approach

7.1 Introduction

- 7.1.1 The aim of this chapter is to present the response of LB Lewisham to the growth scenarios assessment or, in other words, the Council's reasons for supporting the preferred option, on balance, recognising that the assessment finds it to be associated with both pros and cons.

7.2 The preferred approach

- 7.2.1 The following is the response of the Borough Council's officers to the assessment / reasons for supporting the preferred growth scenario (N.B. this text does not comprise an 'assessment'):

"In the absence of certainty over the Bakerloo Line Extension (BLE) there is a need to progress a spatial strategy in-line with **Scenario 1**. However, there is also a need for flexibility in respect of the BLE. Specifically, there is a need to ensure that a framework is in place to support higher density development close to any future BLE stations. With regards to Scenario 2, which would see higher growth without the BLE, this is a reasonable scenario to explore, but is not supported as the preferred approach.

The growth scenarios have explored a number of potential responses to the BLE and, whilst there would be a need for further work to explore opportunities at all locations in proximity to a new BLE station, at this time the option of more ambitious growth at BGLS stands-out as performing well.

The assessment highlights higher growth scenarios as performing well in a number of respects, albeit there would also be environmental tensions, which would need to be appropriately managed. The assessment also raises uncertainties with respect to the potential impacts of growth scenarios on the achievement of economic objectives, highlighting some of the tensions around industrial land management in the context of significantly boosting housing supply. A key point to reiterate is that higher growth would need to be supported by the BLE, with the GLA not supportive of Boroughs planning for a level of growth above the target rate set out in the London Plan in the absence of certainty on infrastructure capacity.

Tensions between growth sceneries and the achievement of certain sustainability objectives are acknowledged, and the Local Plan therefore proposes to include detailed policies that support the spatial elements of the plan, and will provide greater certainty about the outcomes sought by the Local Plan. For example, and notably, policies for employment land will help to ensure that the development and use of land is effectively managed, so that identified long-term needs for business and business space can be met whilst promoting a more inclusive economy. A positive and proactive approach is advocated by the plan to grow the local economy, building on the area's economic strengths, and recognising the potential for the BLE to drive forward economic development. The Local Plan also aims to provide a coherent local framework for responding to the climate emergency and, linked to this, also proposed detailed policies around the protection and enhancement of green infrastructure to deliver net gains in biodiversity."

Part 2: What are the assessment findings at this stage?

8 Introduction to Part 2

8.1.1 The aim of this part of the report is to present an assessment of the Proposed Submission Local Plan.

8.2 Assessment methodology

8.2.1 The assessment identifies and evaluates ‘likely significant effects’ of the plan, as a whole, on the baseline situation in respect of the sustainability topics/objectives that comprise the IIA framework (see Table 3.1).

8.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited.

8.2.3 Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness).

8.2.4 In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits of the Local Plan in more general terms.

8.2.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Draft Local Plan to impact on the baseline when implemented alongside other plans, programmes and projects. These effect ‘characteristics’ are described within the assessment as appropriate.

Adding structure to the assessment

8.2.6 Whilst the aim is essentially to present an assessment of the Local Plan ‘as a whole’, in respect of each of the elements of the IIA framework in turn, it is also appropriate to give some consideration to individual elements of the plan in isolation. As such, each of the topic-specific assessment narratives is broken-down under sub-headings – see Table 8.1.

Table 8.1: Structure of each topic-specific assessment narrative

Sub-heading	Aims of the narrative
Commentary on the spatial strategy	Discuss the proposed approach to site allocation – see Box 8.1 - taking account of area and site specific policy.
Commentary on development management policies	Discuss the development management policies that will apply to all planning applications borough-wide.
Assessment on the plan as a whole	Predict and evaluate significant effects in respect of the Local Plan and make recommendations.

8.2.7 There are two final points to note:

- Specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.
- It is appropriate to highlight changes made since the Draft Plan stage, including in response to points raised through the assessment presented in Section 9 of the Interim SA Report (2020). This is because the issues to which changes relate will often tend to be somewhat marginal and, in turn, might warrant being a focus of further scrutiny ahead of plan finalisation (it is not because there is need for this report to present an ‘audit trail’). However, there is also a need to avoid the assessment becoming overly long and unwieldy. As such, some less insightful assessment findings from the Interim IIA Report have been edited-out at this stage, even where they still hold true for the Proposed Submission Plan.

Box 8.1 Summary of the proposed spatial strategy

Policy OL1 (Delivering an Open Lewisham) presents the spatial strategy, including the Local Plan Key Diagram (see Figure 8.1). In summary, the spatial strategy involves focusing growth at:

- The two designated **Opportunity Areas**,
 - albeit the majority of growth that will occur in these areas over the plan period is already committed (in particular Deptford Creek / Greenwich Riverside and, to a lesser extent, Lewisham);
- The **Strategic Area of Regeneration** that extends across the south and southeast of the Borough;
- Lewisham and Catford **town centres** and the **district town centres** at Blackheath, Deptford, Downham, Forest Hill, Lee Green, New Cross and Sydenham;
- The **A21 corridor** (Lewisham High Street, Rushey Green and Bromley Road) and, to a lesser extent, other strategic corridors (such as the east-west New Cross Road / A2 corridor);
- Locations that will support the case for strategic **infrastructure upgrades**, in particular a focus at Bell Green and Lower Sydenham with a view to supporting Opportunity Area designation and the BLE Phase 2;
- Proactively seeking to optimise **densities** at sites, including supporting higher densities, in appropriate locations, where this serves to secure a good mix of uses, including affordable housing and workspace;
- Proactively supporting development of **smaller sites**, leading to sensitive intensification for some more suburban areas, in line with the adopted Small Sites SPD.

The total capacity of the proposed allocations is circa 24,400 homes, and it is expected that all of these sites will be delivered within the plan period. Additional supply over the plan period (2020/21 to 2039/40) then comes from: large consented sites that do not require an allocation (~1,500 homes); and small sites (including delivered/consented and a windfall assumption) (~7,370 homes). In total, therefore, the total proposed supply over the 20 year plan period is **~33,300 homes**, or **1,665 dpa**. This broadly aligns with the London Plan target figure of 1,667 dpa; however, there are two further considerations. Firstly, there is a need to consider the trajectory of housing delivery across the plan period, namely the fact that it is naturally weighted more towards earlier years. Secondly, there is a need to consider the need for a supply buffer over-and-above any housing target/requirement that is committed to for the purposes of monitoring (and five year housing land supply and Housing Delivery Test calculations), as it is inevitably the case that not all of the large sites in the supply will deliver as anticipated. These matters are explored further under the 'Housing' heading, in Section 9.

A final element of the proposed spatial strategy is proposed 'plan B' for the cluster of proposed allocations at **Bell Green and Lower Sydenham**. Specifically, the Local Plan is clear that there will be the potential to deliver significantly higher densities under a scenario whereby BLE Phase 2 comes forward in the plan period.

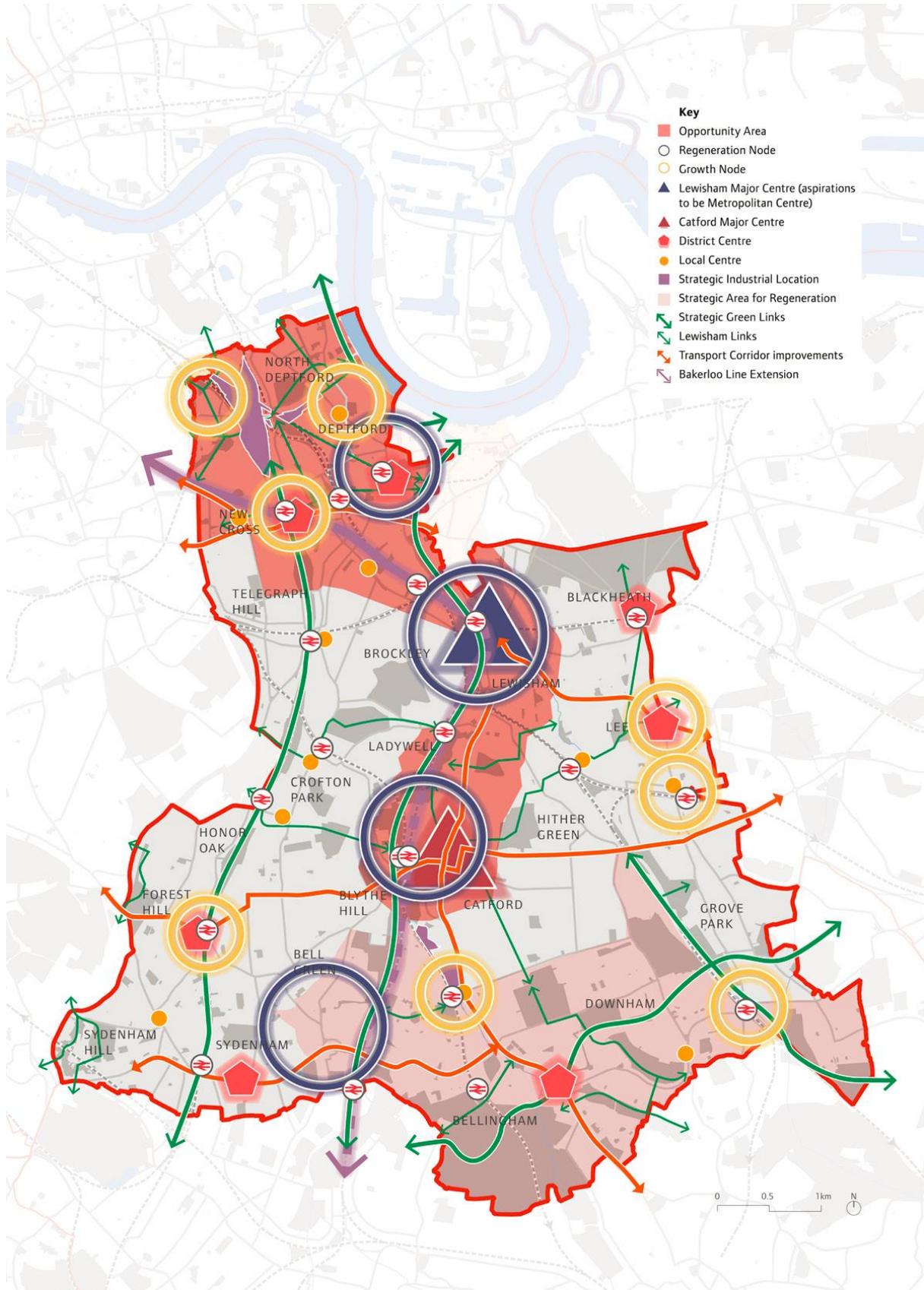
The proposed strategy, in respect of homes at allocations, breaks down by sub-area as follows (rounded):

- **Central** – 7,084
- **North** – 12,930
- **East** – 1,244
- **South** – 2,262 or up to 4,736 under a BLE P2 scenario
- **West** – 901

With regards to **employment land** (i.e. B-class land of all types) the headline is a proposed supply of 242,000m² across the allocations. However, this is a gross figure, as opposed to a net figure taking account of loss of existing employment land onsite. Also, there is a need to consider specific types of employment land, most notably designated SIL and LSIS. With regards to broad distribution, 46% of the new employment land is set to come forward in the North (with the vast majority already committed), and 33% in the Central area. These matters are explored under the 'Employment' heading in Section 9.

Finally, there is a need to consider the proposed strategy for **main town centre uses**. The headline is a proposed supply of 319,000m². However, again, this is a gross figure, as opposed to a net figure taking account of loss of existing employment land onsite. With regards to broad distribution, 41% of the new supply is set to come forward in the Central area, and 31% in the North (with the vast majority already committed). These matters are explored under the 'Communities (accessibility)' heading in Section 9.

Figure 8.1: The proposed growth strategy



A note on committed elements of the spatial strategy

- 8.2.8 A significant proportion of the proposed allocations already have planning permission, either in whole or in part, and others are at a stage where pre-application discussions are advanced, such that there is a strong likelihood that they will gain planning permission prior to the Local Plan being adopted. Keeping pace with a changing situation, in these respects, has proved a major challenge to the plan / IIA process.
- 8.2.9 Where it is the case that a site is committed, or nearing being committed (i.e. advanced pre-application discussions), it is fair to assume that the plan will have little or no bearing on development, albeit it is recognised that it is not uncommon for revised applications to be submitted.
- 8.2.10 It follows that these elements of the spatial strategy need not be a focus of the assessment. There is a need for the assessment to focus on those elements of the spatial strategy that are the result of decisions made through the plan, taking commitments / near commitments into account as part of the baseline.
- 8.2.11 In particular, in the **north of the Borough**, of 12,930 homes supply from allocations, just 1,086 homes are set to come forward at sites that are neither consented nor at an advanced stage of pre-application discussion, and of these 1,086 homes, all but 98 are set to come forward at sites where the approach to growth has been largely decided through an SPD, namely the New Cross Gate SPD. It is equally the case that the vast majority of employment land supply and town centre uses supply is set to come forward from sites that are committed. The two stand-out consented sites are:
- Convoys Wharf MEL – is set to deliver 3,500 homes (14% of borough supply from allocations), 47,700m² employment (20%) and 50,400m² town centre uses (16%).
 - Surrey Canal Triangle MEL - is set to deliver 4,089 homes (17% of borough supply from allocations), 14,253m² employment (6%) and 46,469m² town centre uses (15%).
- 8.2.12 It is also more broadly the case that the north of the Borough is set to see significant change, regardless of the Local Plan. The following bullet points provide an overview of anticipated change in the north of the Borough, which can be considered more-or-less part of the future baseline:
- By 2040 the North Area will have become a more attractive place to live, work, study, visit, and move around. Major committed schemes will be well integrated into the area with both new and existing residents benefiting from the close proximity to employment, retail, and leisure uses.
 - The employment offer will be transformed through new employment floorspace as part of mixed-use development on former industrial/MEL sites including Convoys Wharf and Surrey Canal Triangle.
 - The area will continue to emerge as one of London's leading centres for the creative and digital industries, with a successful Creative Enterprise Zone, with the Council working in partnership with world class institutions such as Goldsmiths, Lewisham College, the Albany, and Laban Centre.
 - The historic high streets of Deptford and New Cross will be strengthened through high-quality new development clustered around rail stations, a new local centre for North Deptford will be created at Evelyn Street, serving Convoys Wharf and Deptford Market will continue to be protected and enhanced.
 - The Council in partnership with TfL will have explored the issues of severance and congestion on the A2 corridor, which will have been transformed into a pedestrian and cycle friendly corridor. Development either side of New Cross Gate train station will have facilitated the Route 1 cycleway and there will be improved pedestrian and cycling connections more widely, building on the North Lewisham Links.
 - The area will have improved public transport, including a new train station at Surrey Canal Triangle, new river bus service at Convoys Wharf and improved bus services, and the arrival of the BLE will – if secured - have a transformative effect on the entire neighbourhood.
 - Across the area heritage assets will have been enhanced and protected including non-designated assets on New Cross Road, and within the Deptford High Street conservation area. Improvements to the general public realm will have addressed the condition of many of the communal spaces within the estates, and to provide additional tree coverage. There will be improved public access to Deptford Creek and to the Thames, and better links between key green spaces including the New Cross Nature Reserve and Waterlink Way, with Convoys Wharf facilitating a new waterfront destination.
- 8.2.13 A high proportion of growth in both the central and eastern areas of the Borough is also set to come forward via committed sites. For example, in the Central area, the seven largest allocations, by housing yield are either now consented or the subject of advanced pre-application discussions.

9 Assessment of the Local Plan

9.1 Introduction

- 9.1.1 The aim of this section is to present an assessment of the Proposed Submission Local Plan, as a whole, under each of the IIA topic headings.

9.2 Air quality and other pollution

Objective: Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.

Commentary on the spatial strategy

- 9.2.1 The proposed spatial strategy (see Box 8.1 and Figure 8.1) is broadly supported in that the aim is to **focus growth** on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough. The effect should be to minimise 'need to travel by private car' (including taxis) amongst the Borough's residents and, in turn, minimise traffic and associated air pollution.

- 9.2.2 The Council's approach to calculating indicative **densities** for the suite of uncommitted proposed allocations is a key consideration here, in particular the weight given to Public Transport Accessibility (PTAL). Gross indicative densities (i.e. densities calculated before having accounted for the need to provide for non-residential uses) at uncommitted sites range from c.130 to 150 dwellings per hectare (dph) on average in the south and east sub-areas, where PTAL is relatively low, to c.280 - 290 dph on average in the central and north sub-areas, where PTAL is relatively high. Capacities for uncommitted sites have mostly been established using a standardised methodology, building on the approach set out in the London SHLAA, which informed the draft London Plan; however, in some cases densities have been revised downwards to reflect local sensitivities. For example, and potentially of note, the proposal is to reduce the indicative densities for the two adjacent sites at New Cross Gate (Former Hatcham Works, New Cross Road (912 homes); and Goodwood Road and New Cross Road (121 homes) below the SHLAA figure to reflect local sensitivities, including heritage. This is despite the two sites potentially set to be located near adjacent to a Bakerloo Line station, subject to BLE Phase 1. Further specific points include:

- The **north sub-area** is notable for falling within an AQMA and being associated with cluster of recently completed and committed sites where the densities exceed the level that might be expected given their PTAL (reflecting wider Opportunity Area and regeneration objectives), which might feasibly give rise to concerns in respect of travel by private car. The final *net* residential density (i.e. taking account of the final number of homes delivered on site) at the following committed sites is of note:

– Surrey Canal Triangle MEL – 4,089 homes consented at over 500 dph;

– Creekside Village East 393 homes consented at 644 dph; and

– Achilles Street - is at the pre-application stage and now proposed for 363 homes at a density of 259 dph, having previously been supported for 651 homes in the Draft Plan.

Focusing on the non-committed proposed allocations, at two sites (c.500 homes in total), the proposal is to increase density, over-and-above that suggested by the London Plan SHLAA methodology, whilst at three sites (c.500 homes) the proposal is to reduce density to a figure below that suggested by the London Plan SHLAA methodology. As discussed above, there is potentially a transport and air quality argument for higher growth at the proposed allocations adjacent to New Cross Gate station. However, on the other hand, there is an argument for limiting growth in this sub-area as a whole, even where PTAL is high (or set to become high), given committed growth and air quality issues.

- **The A21 corridor** - is currently dominated by traffic with a poor quality public realm and pedestrian and cycle environment. With regards to that part between Lewisham and Catford, much of the road corridor is dominated by larger sites and blocks leading to irregular east-west connections, with the potential for development to enhance the network of smaller connector streets, provide clear and logical crossing points and enhance links between the A21 and the river corridor / Water Link Way.

With regards to the three uncommitted sites, the proposed net densities range between 138 and 176 dph, following detailed consideration through the A21 Development Framework. Land at Engate Street, which is located at the southern edge of Lewisham town centre, is notable because the Draft Plan (2020) proposed 193 homes whilst the latest proposal is for 112 homes, plus increased town centre uses. It will be important to ensure that there are no opportunities missed in respect of investment locally.

With regards to the A21 corridor south of Catford, two key proposed allocations are Ravensbourne Retail Park and Homebase/Argos, Bromley Road, where the proposal is to deliver mixed use development in place of out-of-town retail, with associated improvements to the urban realm and improved access to the river, albeit there are associated flood risk constraints.

- The cluster of six proposed allocations in the **BGLS** area are mostly uncommitted, and the proposal is to assign an indicative density on the basis of the London Plan SHLAA standard methodology, which leads to a low average density in the region of 95 dph given low PTAL. However, the Local Plan is also clear that under a BLE phase 2 scenario there would be support for a reassessment of the area's potential to accommodate much higher densities, commensurate with the significant change in PTAL levels, and potentially taller or tall buildings.

Alongside this higher density development would be delivered a new local centre with a considerable offer of services, facilities, retail and employment, which could go some way towards addressing the issue of poor accessibility locally, which has led to much of the southern part of the Borough being designated as a Strategic Area of Regeneration, and which the plan document describes as being associated with "*few community facilities and limited employment opportunities*". Strategic growth could also facilitate investment in walking / cycling infrastructure, the urban realm, greenspace (e.g. re-naturalisation of the Pool River) and links between greenspaces (notably the Pool River, Beckenham Place Park, Sundridge Park and Crystal Palace Park), helping to address existing issues that serve to dissuade people from walking and cycling and, in turn, supporting reduced car movements. Much of this area is not designated as an AQMA (which is rare in the London context).

9.2.3 Aside from the matter of carefully matching assigned indicative development densities to PTAL levels, there is also a need to consider **site-specific policy** that will ensure that developments, both in isolation and in combination, deliver upgrades to urban realm and local movement infrastructure that support active modes of travel (also such that exposure to sources of air and noise pollution is minimised). Notable issues/opportunities set to be addressed through the spatial strategy include:

- **Catford** - the layout of larger sites and blocks, and the location of the South Circular dissecting the town centre, has led to high levels of severance and poor permeability and legibility. The proposed Laurence House allocation will support delivery of a realigned South Circular road, creating a cohesive town centre and improved accessibility along the approach to Catford and Catford Bridge train stations; however, details remain uncertain at this stage, with the proposed site specific policy stating that applicants must: "*Work in partnership with Transport for London to deliver the realignment of the A205 South Circular, ensuring it is integral to the development of the site.*" There will also be loss of Metropolitan Open Land (MOL), as discussed further below. Aside from the South Circular realignment, the intention is also to support a much-improved public realm and movement framework, as well as new greenspace, potentially with benefits from an air quality perspective. The Catford Town Centre Masterplan explains:

"Addressing issues relating to the poor quality of the environment and public realm are key... and the ambition is to establish Catford as an exemplar of the 'greening' of a town centre. The objective is to transform what is today a noisy and fast pace urban environment into a more tranquil, cleaner, healthier and more sustainable town centre for the benefit of people, urban wildlife and ecology. Enhancing the sense of arrival at the two Catford stations will be delivered through an upgraded public realm with a focus on generosity of space and connectivity for pedestrians and cyclists."

- **Lewisham** - the stand-out large Lewisham Shopping Centre site is key to the renewal of the town centre and will play a critical role in linking sites and neighbourhoods surrounding it. The proposed site specific policy states:

"The site must be re-integrated with the surrounding street network to improve access and permeability into and through the town centre. This will require significant reconfiguration and re-orientation of the existing buildings and spaces to achieve clearly articulated east-west and north-south corridors..."

Lewisham Gateway is also notable as a consented site (649 homes to be completed in the plan period, in addition to those already delivered) that will see open space reconfigured as part of: *“A programme of river restoration, including channel re-profiling, to improve the ecological quality of the water environment and enhance the amenity provided by the Rivers Quaggy and Ravensbourne, along with Waterlink Way [to include a] central landscaped open space that celebrates the confluence of the rivers.”*

9.2.4 Final points to note relate to:

- Out of town retail – the proposal is to redevelopment of out-of-town retail areas, notably at Ravensbourne Retail Park, Bell Green Retail Park and Homebase/Argos, Bromley Road. This strategy is in accordance with the findings of the Retail Capacity Study (2019); however, there is a need to apply a degree of caution, given a residual risk of residents needing to travel by car to access retail further afield.
- The South East London Combined Heat and Power (**SELCHP**) plant - gives rise to concerns from an air quality perspective, as reflected in consultation responses received in 2020. The London Plan effectively requires it to be safeguarded; however, one of the key objectives for the North area has been supplemented to emphasise the need to improve environmental performance.
- Mixed use redevelopment of industrial sites – gives rise to a range of environmental health, safety and residential amenity considerations. There have been some notable adjustments made since the Draft Plan stage, as discussed above (Section 5.3) and below (under ‘Accessibility’ and ‘Employment’).
- Silwood Street – is a new allocation since the Draft Plan stage, albeit the site is consented. It is a notably narrow site adjacent to an elevated railway line, such that noise pollution will be a consideration.

Commentary on other policies

- 9.2.5 Policy **SD6** (Improving air quality) has been notably adjusted since the Draft Plan stage, with a new emphasis on use of the design-led approach, and a new requirement for *all* developments (not just majors) to be at least air-quality neutral, to bring the local plan into alignment with the London Plan. The policy also more explicitly aligns with the council’s latest Air Quality Management Plan, and there is some elaboration in respect of particulates pollution, following submissions received from the public.
- 9.2.6 The series of ‘Transport and Connectivity’ policies is focused on improving the Borough’s public transport and walking/cycling network, which is likely to help deliver air quality improvements through reduced car dependency. **TR4** (Parking) is of note as the Draft Plan policy reference to air quality has been removed.
- 9.2.7 Policies **GR2** (Open space) has been amended to ensure a clear hierarchy of open spaces, with criteria in respect of reconfiguration and reprovision varying according to position in the hierarchy. There is support for development proposals involving the reconfiguration of existing open space where there is no detrimental impact on *“environmental function... including support for nature conservation”*. It is fair to assume that functions in respect of air quality / avoiding air pollution will also be maintained.
- 9.2.8 Policy **SDF4** (Energy infrastructure) is also of note for its focus on ensuring CHP and gas boilers do not adversely impact air quality. In practice new CHP is not likely to come forward as it is now questionable, at best, as a low carbon technology, given decarbonisation of the national grid.
- 9.2.9 Noise and other forms of pollution are primarily addressed by the ‘High quality design’ policies. For example, the supporting text to Policy **QD7** (Amenity and agent of change; which consolidates three policies from the Draft Plan) explains: *“Whilst the Agent of Change principle deals predominantly with noise it also addresses other nuisances including vibration, odour, fumes, dust, artificial light and... waste.”*

Assessment of the plan as a whole

- 9.2.10 The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support/unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough. The effect should be to minimise need to travel by private car amongst the Borough’s residents and, in turn, minimise traffic and associated air pollution.

- 9.2.11 Specific points of support relate to: a carefully targeted approach to densities at BGLS, where masterplanned strategic growth (under BLE Phase 2) could assist with reducing car dependency amongst residents of nearby neighbourhoods; numerous proposed allocations that will support walking/cycling, including along the A21 corridor, and/or access to greenspace; the proposed approach to growth at Catford, which is in line with the Catford Town Centre Masterplan, including in respect of improved town centre permeability and realignment of the South Circular; and the proposed approach to Lewisham town centre, which should be supportive of town centre viability and movement objectives.
- 9.2.12 There are some question-marks regarding proposed densities in the north of the Borough; and it is also important to note that the proposed approach to assigning an indicative use mix at strategic sites has been adjusted since the Draft Plan stage, with an increased emphasis on floorspace given over to residential, informed by the Town Centre Study (2022).
- 9.2.13 With regards to the proposed DM policies, Policy SD6 (Improving air quality) sets stringent requirements. The Interim SA Report (2020) suggested *“it will be important to ensure that the firm focus of the Local Plan is on avoiding air pollution... noting that the effectiveness of mitigation measures can often be associated with a degree of uncertainty”*, hence the new focus on air quality neutral developments is *tentatively* supported. The following statement within supporting text is of note: *“In practice, it may not always be possible to achieve Air Quality Neutral standards... on-site... [if so] the [assessment] should demonstrate that it is possible to include measures in the local area with equivalent air quality benefits...”*
- 9.2.14 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage. Whilst development management policy has been notably strengthened, there remain certain question-marks regarding development density and use mix.

9.3 Biodiversity and green infrastructure

Objective: Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.

Commentary on the spatial strategy

- 9.3.1 The proposed spatial strategy is broadly supported in that the main focus of growth is within the **central and south sub-areas** of the Borough, with a high proportion of proposed allocations closely associated with the valley of the River Ravensbourne and its tributary the Pool River (the rivers meet at Catford). This is a green/blue infrastructure priority area, as identified by the All London Green Grid. Specifically:
- The Waterlink Way – there is a strategic aspiration to: *“Create and promote a connected park system along the Ravensbourne and Pool Rivers re-instating the natural channel, improving habitats, creating an exemplary green transport route including a link southwards towards Bromley, and exploring opportunities for improving health and the local environment.”*
 - South East Green Chain Park – there is a strategic aspiration to: *“Examine the feasibility of developing the South East London Green Chain as a regional park opportunity.”* The Regional Park would follow the southern edge of the borough, taking in land to the east of Lower Sydenham station that skirts the southern edge of Bellingham, linking to Beckenham Place Park and beyond.
- 9.3.2 There are widespread significant opportunities to re-naturalise the river and improve public accessibility, including via delivery of new areas of greenspace along the river corridor. It is difficult to suggest that intensification of uses along the river corridors leads to a tension with biodiversity and green infrastructure objectives, with the plan document notably explaining that:
- “The river valley network is a defining feature of the Central Area which development proposals should respond positively to by: Ensuring that development is designed to improve the ecological quality of the Ravensbourne and Quaggy rivers, including by naturalising the rivers, wherever opportunities arise; Ensuring the layout and design of development gives prominence to the rivers and the river valley, and enhances their amenity value, including by better revealing them; and Facilitating the provision of new and enhanced connections to and along the rivers and river valleys, including by extending and improving the Waterlink Way. Walking and cycling links to the river from the town centres of Lewisham and Catford, and the A21 corridor, will be strongly supported.”*

... The South Area's network of green infrastructure, including open spaces, will be protected and enhanced, in line with other Local Plan policies. Investment at Beckenham Place Park will continue to be supported... Development proposals within the immediate vicinity of the park should provide for enhanced legibility, wayfinding and access to and from its entrances, and be designed having regard to the park's landscape and historic setting. The council will work with stakeholders to deliver flood alleviation measures at the park, in line with the River Corridor Improvement Plan SPD."

9.3.3 Under a BLE phase 2 scenario higher growth could well support the aspiration of delivering a regional park, and, regardless, the new community would have very good access to high quality green infrastructure. However, there could potentially be a tension associated with achieving a higher density at the proposed Bell Green Retail Park and Sainsbury's Bell Green sites as the Pool River bounds the eastern extent of these two adjacent sites. From a biodiversity and green infrastructure perspective there will be a strong argument for delivering a significant new area of greenspace here, to buffer the river.

9.3.4 There will also be a need to consider **in-combination issues** and opportunities associated with redevelopment at both Bell Green Retail Park, as the southern extent of the Pool River Linear Park, and two sites at the northern extent, namely Wickes and Halfords, Catford Road and Pool Court (proposed as a gypsy and traveller site; currently comprises a Site of Importance for Nature Conservation, SINC). There could feasibly be an opportunity to extend the park into one or both of the larger development sites, and it is recommended that this option is explored, with a view to an overall biodiversity net gain, as measured/calculated at an appropriate functional scale. Extending the Linear Park would also be in line with open space objectives, noting the key finding of the Lewisham Open Spaces Assessment (2019), which is that a significant amount of additional provision will be required to maintain standards (of access to open space) over the long-term. However, it is recognised that there is a need to balance wide ranging objectives when considering how best to redevelop these sites. Site specific policy currently states:

- Bell Green Retail Park – *"Development proposals must protect and seek to enhance green infrastructure, including SINC, green corridor, Metropolitan Open Land and the Pool River."*
- Wickes and Halfords, Catford Road – *"Development should maximise opportunities to enhance the ecological quality and amenity provided by the River Ravensbourne, including by revealing the river through decluverting, repairing gaps in Waterlink Way and improving public access to it."*

This site specific policy is broadly in accordance with the Site Specific Design and Development Guidelines set for Wickes and Halfords, Catford Road within the adopted River Corridor Improvement Plan SPD (2015). Figure 9.1 shows one of the figures from the SPD, showing the location of the Pool River Linear Park between BGLS and Catford, also highlighting proximity of Beckenham Palace Park.

- Pool Court – is very closely associated with the river corridor. The site specific policy now requires that proposals *"must protect and seek to enhance green infrastructure and biodiversity, including the SINC."*

9.3.5 Maintaining a focus on the **central and south sub-areas**:

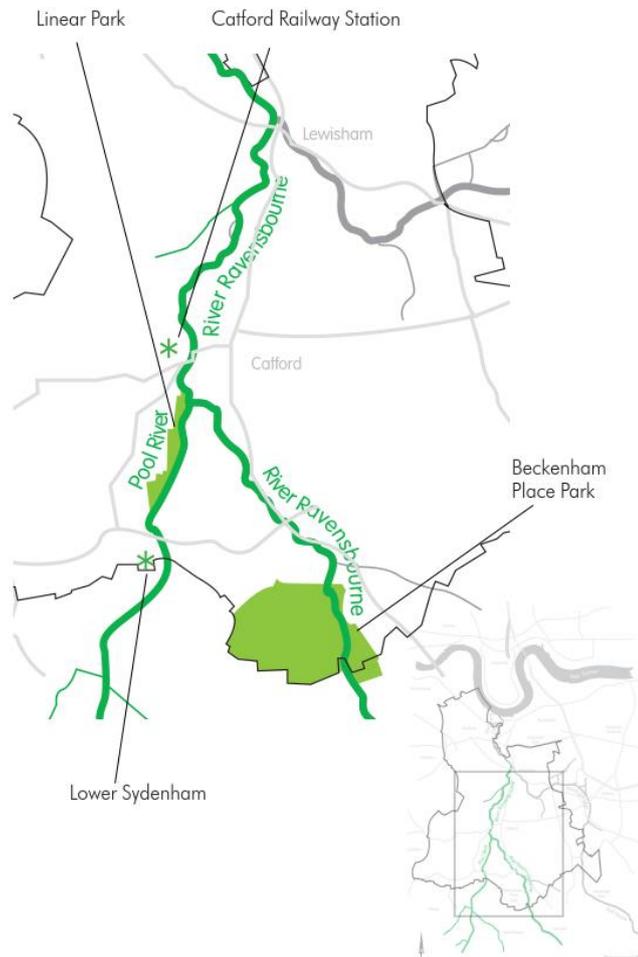
- Conington Road (which is committed) and Land at Conington Road and Lewisham Road (Tesco) (which is uncommitted) are two adjacent sites in the central sub-area closely associated with the river corridor. Site specific policy explains that: *"Development should positively respond in scale, bulk and massing to the River Ravensbourne, taking advantage of the natural slope of the site. The river embankment should be visually and physically accessible from Conington Road and improve access to Lewisham transport interchange, Lewisham Gateway and the wider town centre environs."*

Site specific policy has been supplemented, since the Draft Plan stage, to require that consideration is given to the River Corridor Improvement Plan SPD. However, it is understood that a local action group, with an interest in re-naturalising the river corridor, would wish to see firmer requirements set.

- Homebase/Argos, Bromley Road is one of two larger proposed allocations outside of BGLS cluster and is associated with the river valley. Site specific policy explains that: *"Development should positively respond to the open and green features... The eastern corner of the site includes a pond, designated as a [SINC]. Designated public open space and a [SINC] also exists to the south east of the site..."*
- Beadles Garage is not associated with the river valley, but has a degree of sensitivity nonetheless. Site specific policy explains that: *"Consideration should also be given to creating an enhanced relationship between the site and the designated public open space and SINC immediately to the north of the site whilst respecting it's character and context as an historic cemetery with archaeological value."*

- Ravensbourne Retail Park is currently at the pre-application stage. The site specific policy has been supplemented to require: *“Development must be designed to improve the ecological quality, carbon storage and public amenity value of the River Ravensbourne, and seek to re-naturalise the river where feasible, taking into account the River Corridor Improvement Plan SPD.”*

Figure 9.1: River corridors in the south / central area



9.3.6 The following bullet points consider the remaining sub-areas in turn:

- **North sub-area** – is also associated with an inherent degree of constraint given the River Ravensbourne, Deptford Creek and the River Thames, although it is important to note that recent developments have been successful in respect of delivering river naturalisation, improved access to the rivers and high quality reconfigured open space. As discussed, the great majority of sites are already committed, but Lower Creekside LSIS is of note for being only at the pre-app stage. A key opportunity is to achieve “environmental enhancements to improve the quality of the Creekside area” and the following development requirements are proposed:

“Delivery of new and improved public realm and open space, in accordance with a site-wide public realm strategy, including... Waterside access and amenity space, with provision of a new public path along Deptford Creek linking to Waterlink Way.

Development proposals must protect and seek to enhance green infrastructure, including the SINC, the intertidal terrace and the sand martin bank at Deptford Creek.”

- **East sub-area** – site specific policy for Blackheath Hill LSIS explains that: *“Development must conserve and seek to enhance green infrastructure, including the SINC that abuts the site at its south and eastern boundaries.”* Also, Southbrook Mews and Travis Perkins and Citroen Garage are two nearby small proposed allocations in the East sub-area separated by the railway line and the associated embankment, which is designated as a SINC. Site specific policy for both proposed allocations explains that: *“Development must conserve and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment.”*

A further consideration is the potential biodiversity opportunity associated with the redevelopment of Leegate Shopping Centre (which is at the pre-application stage) alongside adjacent smaller sites Sainsbury's Lee Green and Land at Lee High Road and Lee Road, noting extensive green infrastructure to the east, within LB Greenwich, associated with the upper reaches of the Quaggy River. Site specific policy for the site most closely associated with the river (Land at Lee High Road and Lee Road) references the need to enhance access and "ecological quality"; however, site specific policy for the other two sites, which are considerably larger, does not discuss any biodiversity opportunity.

- **West sub-area** – there are several sites / site clusters of note:
 - 111-115 Endwell Road and 2 6 Mantle Road are two nearby small proposed allocations separated by the railway line and the associated embankment, which is designated as a SINC. Site specific policy for both proposed allocations explains that: *"Development proposals must protect and seek to enhance green infrastructure, including the SINC and green corridor along the railway embankment."*
 - Land at Forest Hill Station East is also adjacent to the railway SINC; however, in this case the biodiversity constraint / opportunity associated with the SINC is not referenced in site specific policy. It is recommended that this is reviewed, with a view to ensuring a targeted strategic approach to protecting and enhancing the functioning of the railway SINC.
 - Featherstone Lodge, Eliot Bank is a locally listed mid-19th Century house that sits within mature gardens and is located close to listed buildings. Redevelopment of the site, which is now consented, will seek to 'evoke the feeling of a village green'.

9.3.7 Another site of note is Havelock House, Telecom Site and Willow Tree House, near Horniman Drive, which was a proposed allocation in the Draft Plan, but is now an **omission site**, following comments received through consultation regarding the value of landscape features and character (remnants of the Great North Wood). The proposal in the Draft Plan stage was for, a lower density scheme, with site specific policy stating: *"A tree survey will be required to identify healthy, mature trees to be retained within the backland plot. Development should be respectful of the natural landscaping and mature landscape setting and create a public realm space to evoke the feeling of a village green."*

Commentary on other policies

9.3.8 Policies **GR1 – GR5** directly address the importance of conserving and enhancing green infrastructure and biodiversity across the Borough. Generally, these policies highlight areas of strategic importance which must be protected, as well as opportunities for enhancement. This includes the South East London Green Chain, which is one of the 12 priority areas set out in the All London Green Grid.

- Policy GR1 (Green Infrastructure and Lewisham's Green Grid) sets out the expected multifunctionality of green infrastructure, and requires that proposals *"maximise opportunities to enhance existing green infrastructure and create new provision on site, with reference to the All London Green Grid"*.
- Policies GR2 (Open space) is updated to ensure a clear hierarchy of open spaces, with criteria in respect of reconfiguration and reprovision varying according to position in the hierarchy. There is support for proposals involving the reconfiguration of existing open space where there is no detrimental impact on the *"environmental function of the open space, including support for nature conservation"*.
- GR3 (Biodiversity and access to nature) has been modified to ensure a clear focus on biodiversity net gain, albeit understanding is still evolving nationally in respect of biodiversity net gain in urban area. The following proposed strategic (as opposed to piecemeal) approach is strongly supported: *"[The Council] will prepare a Local Nature Recovery Strategy (LNRS) as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough."* There is also a need to carefully consider the links between biodiversity net gain and urban greening (Policy GR5).
- Policy GR4 (Lewisham Links) – has been notably amended to aid effective implementation. Specifically, it will not be appropriate for *all* development proposals to contribute to the Lewisham links. The specific circumstances in which they should be set out in GR4.B.

9.3.9 Policy **GR6** (Food growing) is also of note. The policy promotes specific local scale open space provision for the benefit of local communities. Finally Policies **QD1** (Delivering high quality design in Lewisham), **QD3** (Public realm and connecting places) and **TR3** (Healthy Streets as part of healthy neighbourhoods) all recognise the important role green infrastructure enhancements and urban greening play in delivering a high quality public realm. For example, Policy QD3 states: *"Public realm should be sustainability designed and constructed, including by maximising opportunities for urban greening ..."*.

Assessment of the plan as a whole

- 9.3.10 The proposed spatial strategy is broadly supported in that the main focus of growth is within the central and south sub-areas of the Borough, with a high proportion of proposed allocations closely associated with the valley of the River Ravensbourne and its tributary the Pool River (the rivers meet at Catford; very close to a small proposed gypsy and traveller site, which comprises land designated as a SINC). This is a green infrastructure priority area, as identified by the All London Green Grid. There are widespread significant opportunities to re-naturalise the river and improve public accessibility, and it is difficult to suggest that intensification of uses along the river corridors leads to a tension with biodiversity and green infrastructure objectives, assuming appropriate densities that do not preclude delivery of generous open space within development sites. Indeed, growth could well support the aspiration of delivering a South East London Green Chain Regional Park. There are potentially some tensions under a scenario whereby BLE Phase 2 enables a higher growth strategy at BGLS, but these are uncertain. Elsewhere, a number of sites are adjacent to locally designated SINCs, including SINCs associated with railway embankments / cuttings, and there is potentially a geographical clustering of constrained sites in the west of the Borough.
- 9.3.11 With regards to the proposed DM policies, the suite of proposed policies will help to ensure that biodiversity impacts associated with development – both at proposed allocations and at windfall sites – are suitably avoided or mitigated. No proposed DM policies are highlighted as leading to notable tensions in respect of biodiversity objectives. The plan notably includes a suite of ‘Green infrastructure’ focused policies, and the new proactive and strategic approach to biodiversity net gain is particularly supported, as is the new strategic approach to managing the open space network. The following statement, made within the supporting text, relates to a key strategic opportunity: *“New development can help to enhance access to open space even where it is not feasible to deliver new public open space on site. Through the design-led approach development proposals should seek to deliver public realm enhancements to create new routes or improve connections to existing or planned new open spaces, particularly in areas of deficiency.”*
- 9.3.12 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage, with relatively limited changes to the plan of note.

9.4 Climate change adaptation

Objective: Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.

Commentary on the spatial strategy

- 9.4.1 As per the discussion above, under ‘biodiversity’, a primary consideration is the focus of growth, both in respect of the location of proposed allocations and also proposed indicative densities, within the **central corridor** of the Borough, recognising that this area is associated with the valley of the River Ravensbourne and its tributary the Pool River (with coalescence at Catford):
- At Catford the key site to consider is Wickes and Halfords, Catford Road, which is uncommitted and located within flood risk zone 3, between the Catford and Catford Bridge railway lines, with the River Ravensbourne cutting diagonally through the north of the site in a covered channel. Residential uses would not be likely at ground level, and there could be downstream flood risk benefits associated with revealing and deculverting the river; however, significant concerns associated with intensification remain. The proposal, as set out in the emerging Catford Town Centre Masterplan (see Figure 9.2), is to support relatively high density development in this area, hence there will a need to give careful consideration (prior to allocation) not only to flood risk avoidance and mitigation, but also safe evacuation and flood response procedures. It is recognised that there are recent precedents of high density residential led development schemes in flood risk zone 3 gaining consent (for example Lewisham Retail Park); however, there is a need to apply caution. The following site specific policy has been added, subsequent to the draft plan consultation, on the request of the Environment Agency:

“Applicants should work in partnership with the Environment Agency and engage with them early at pre-application stage, to mitigate against flood risk [and] maximise opportunities for river restoration...”

Figure 9.2: Proposed densities in Catford Town Centre



- In the north of the Borough, in Lewisham and along the A21 corridor flood risk zones intersect a number of proposed allocations. However, the great majority either have planning permission or are at the pre-application discussions stage. For example, Silver Road and Axion House was granted planning consent in 2020, and the Environment Agency did not raise an objection to onsite flood risk in light of the findings of a site-specific Flood Risk Assessment. Indeed, the only entirely non-committed site intersecting flood zone 3 and proposed for residential is Lewisham Shopping Centre.

Also, an importantly, one proposed allocation from the Draft Plan stage highlighted as being subjected to the significant flood risk has now been removed from the plan, namely Molesworth Street Car Park. It is understood that the land here is now understood to be needed for strategic flood water storage.

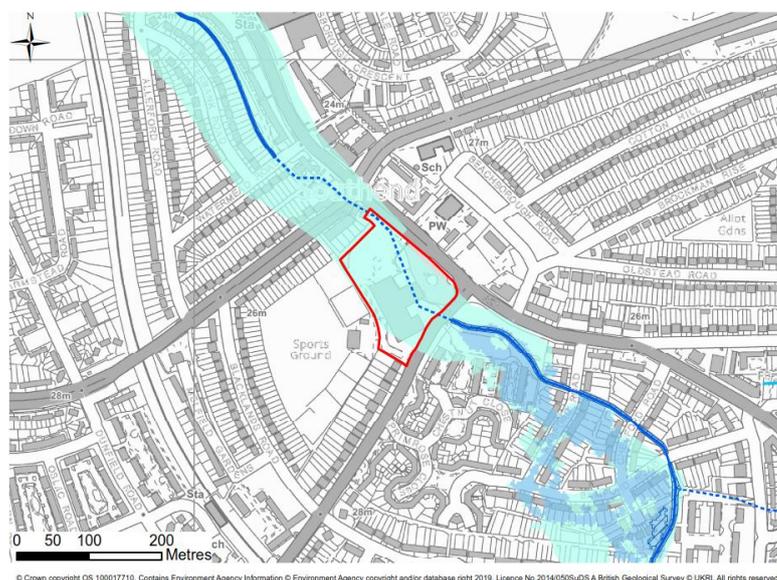
- At BGLS the eastern part of the proposed Bell Green Retail Park site intersects fluvial flood risk zone 2, associated with the adjacent Pool River, and the Worsley Bridge Road LSIS skirts flood zone 3 (with the site notably falling between the railway line and the river, in a similar fashion to the Wickes and Halfords site at Catford). However, it is difficult to assume that higher growth scenarios (which is supported by the plan under a BLE Phase 2 scenario), would lead to increased pressure to deliver homes in (or adjacent to, recalling the need to make allowance for climate change scenarios) the flood risk zone.
- Along the A21 corridor south of Catford the two main proposed allocations - Ravensbourne Retail Park and Homebase/Argos, Bromley Road – both fall mostly or wholly within the fluvial flood risk zone; however, the Level 2 Strategic Flood Risk Assessment (SFRA, 2020) finds that the flood risk zone is 'zone 2', presumably because the river is channelled or culverted. By way of an example, Figure 9.3 shows the flood risk zone affecting Homebase/Argos, Bromley Road.
- Pool Court – is a small site closely associated with the confluence of the Rivers Ravensbourne and Quaggy, which is also the confluence of two rail corridors. The GLA's response to the Draft Plan consultation stated a need to "explicitly address concerns related to biodiversity and flood risk, as set out in our response to Lewisham's Gypsy and Traveller Site Local Plan... consultation (Nov 2018).

9.4.2 In the **east** of the Borough, the proposal is to intensify uses at Lee Green district centre through redevelopment of three adjacent sites, including mixed use redevelopment of an existing Sainsbury's. All sites are constrained by the adjacent River Quaggy; indeed, it is notable that the Lee Green district town centre is the first point along the course of the river, as it flows west to meet the Ravensbourne at Lewisham, that is heavily urbanised, with the river to the east buffered by extensive areas of greenspace.

9.4.3 Aside from flood risk there is a need to consider the effect of the proposed spatial strategy in respect of mitigating the **urban heat island** effect and, more generally, higher temperatures and heat waves. Higher density does lead to tensions in this respect, e.g. on the basis that there can be less space for trees and greenspace, and on the basis that tall buildings require air conditioning to counter solar gain. However, as discussed above, the Council's approach to development density is carefully considered.

- 9.4.4 Further considerations relate to the extent to which the spatial strategy supports delivery of new and enhanced greenspaces and green infrastructure more generally. However, these matters have already been discussed above, under the ‘biodiversity and green infrastructure’ heading.

Figure 9.3: Flood risk zone 2 (light blue) and 3 (dark blue) in the vicinity of Homebase/Argos, Bromley Road



Commentary on other policies

- 9.4.5 Policy **SD1** (Responding to the climate emergency) notes Lewisham takes “a *strategic and coordinated approach will be taken to ensure that the Borough ... is made more resilient to its environmental, social and economic impacts.*” The policy makes reference to supporting regional and national action to address global climate change whilst understanding that locally specific responses are urgently needed.
- 9.4.6 Policy **SD7** (Reducing flood risk) includes a focus on implementing the Thames Estuary 2100 Plan, which “sets out actions that are needed to manage flood risk in the Thames Estuary taking account of the long-term impacts of climate change.” This is supported, although there is a need to recognise that much of the flood risk affecting sites under consideration for allocation is associated with the River Ravensbourne and its tributaries, including the Quaggy, the Pool and Kyd Brook.
- 9.4.7 The policy also includes a focus on guiding application of the sequential and exception tests at the development management stage. The supporting text explains: “*The... Exception Test may be satisfied where development provides wider sustainability benefits... that outweigh flood risk. This will be considered on a case-by-case basis however all such development must be demonstrably necessary to support the delivery of the spatial strategy, for example, community or other types of infrastructure.*”
- 9.4.8 Policy **SD8** (Sustainable drainage) recognises the need to tackle surface water flooding which “is an issue in London due to continued urban development (increased impermeable area) and climate change (greater rainfall intensity).” The supporting text has notably been adjusted to explain: “*If it is suitably demonstrated that a greenfield runoff rate cannot be achieved, for example due to reasons of site condition (e.g. land contamination) or technical feasibility, development proposals must minimise runoff rates as far as reasonably practical and maximise measures to improve water quality.*”
- 9.4.9 Policy **GR5** (Urban greening and trees) is also of note given links to sustainable drainage, including via green roofs. The supporting text explains: “*Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character.*”
- 9.4.10 The other key facet of climate change adaptation is developing resilience to the urban heat island effect. Policy **SD5** (Managing heat risk) is focused on this, and should be read in conjunction with Policy **GR5** (urban greening and trees) as urban greening measures have a significant cooling effect. In addition policy **SD5** notes that new developments should reduce reliance on air conditioning systems and follow the London Plan’s cooling hierarchy, to ensure adaptation measures do not increase energy use.

Assessment of the plan as a whole

- 9.4.11 In terms of flood risk, which is a primary consideration, it is again important to note that the central transport corridor that is a focus of proposed growth is also a river valley and, in turn, is associated with significant areas of flood risk, with certain proposed allocations at Lewisham, along the A21 corridor, Catford and at BGLS intersecting the flood risk zone. The proposed broad approach to delivering mixed use at sites that currently comprise non-vulnerable uses – i.e. commercial and industrial land – warrants further scrutiny, from a flood risk perspective, including in light of recent updates (since the Draft Plan stage) to calculating an appropriate use mix at individual sites. There will be very good potential to avoid and mitigate flood risk at the development management stage, including by Sustainable Drainage Systems and ensuring less vulnerable uses on the ground floor; however, there is a need to avoid risk where possible.
- 9.4.12 With regards to the proposed DM policies, Policy SD7 (Reducing flood risk) commits to a sequential approach to avoiding flood risk, with development in the flood zone only in exceptional circumstances, which serves to highlight the importance of close scrutiny of the plan. Supporting text explains that: *“Where the Sequential and Exception Tests are satisfied development proposals must fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through site layout and development design. This includes appropriate measures to ensure development is safe. Proposals should fully assess and address residual risk, including through flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and resilient design (e.g. to ensure the building’s structural integrity is maintained and that drying and cleaning can be facilitated).”*
- 9.4.13 In conclusion, **moderate negative effects** are predicted although there is considerable uncertainty. Whilst one allocation has now been removed (with the new proposal to use the site for strategic flood water storage) there remain question-marks regarding site selection, proposed densities and use mixes at sites subject to flood risk. The Environment Agency will comment through the consultation.

9.5 Climate change mitigation

Objective: Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).

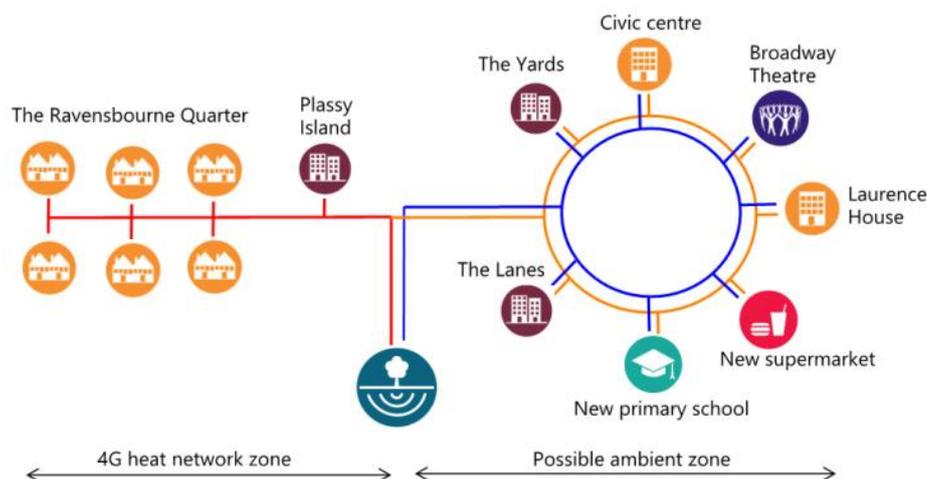
Commentary on the spatial strategy

- 9.5.1 Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment.
- 9.5.2 In this respect a primary consideration is the need to support delivery of **heat networks** and maximise the number of homes that are connected to a heat network. Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means:
- Proximity to a strategic heat source, which can be waste heat from an existing²⁰ CHP plant, industry or waste management, or ambient heat from the ground, water or air, given heat pump technologies;
 - Proximity to a major source of heat demand (also cooling), such as a civic building; and
 - Support for strategic-scale and higher density mixed use schemes that achieve economies of scale and lead to a balanced heat demand profile.
- 9.5.3 The Lewisham Energy Masterplan (2020) identified several heat network priority areas:
- North Deptford – is the part of the Borough associated the greatest locational opportunity given the South East London Combined Heat and Power (SELCHP; powered by waste). Most sites are now committed or near committed, such that the opportunity to explore heat network options is limited. However, the smaller uncommitted sites could, in combination, potentially support a connection to the SELCHP. One of these sites (Apollo Business Centre LSIS) is in close proximity to the SELCHP, hence site specific policy states: *“Proposals should investigate and maximise opportunities for Decentralised Energy, including connections to SELCHP.”* The other uncommitted site (Evelyn Court LSIS) is further east (in the direction of Convoys Wharf); however, there may nonetheless be an opportunity, noting that the Energy Masterplan explains: *“SELCHP have funding to extend the network to the Convoys Wharf...”*

²⁰ Decarbonisation of the electricity grid means that gas fuelled CHP can no longer be considered a low carbon solution.

- Deptford - all of the proposed allocations, bar Albany Theatre, are committed or near committed, such that there may now be limited opportunity to explore heat network options. However, it is recommended that options should be explored nonetheless. A range of strategic heat sources might feasibly be explored; however, the Energy Masterplan states: *“Further feasibility and early engagement is recommended with Veolia [the operators of SELCHP] to discuss the connection [to Convoys Wharf] and ensure that the network is futureproofed for extension to the Deptford area before installation...”*
- New Cross area – the Energy Masterplan explains: *“The New Cross and Bermondsey clusters also presented a good opportunity for heat network development. However... it was decided to not explore these opportunities further as they are already being pursued by SELCHP and other parallel heating studies.”* This is an important opportunity area, as the two sites adjacent to New Cross Gate station remain uncommitted and will together deliver a mix of uses including ~1,000 homes.
- Lewisham – the Energy Masterplan finds there to be a considerable opportunity: *“The redevelopment of the shopping centre, if realised, provides a catalyst to develop a future electrified heat network that will decarbonise and extend the existing networks in the area [which currently draw from CHP, which is no longer a low carbon technology in light of decarbonisation of the national grid]. Early engagement with the shopping centre is recommended to ensure this is captured within the masterplan. Heat supply opportunities include heat pumps (air source or the river) as well as heat recovery from cooling systems at the commercial areas and the Riverdale data centre.”* Site specific policy for Lewisham Shopping Centre does not currently discuss the heat network opportunity, potentially on the basis that Borough-wide Policy SD4 (Energy infrastructure) is judged to provide sufficient detail. However, it is **recommended** that site specific issues and opportunities should be explored and reflected in policy.
- Catford – the proposal is to follow a masterplan-led approach to assigning indicative development densities. It could well be that this strategy is supportive of delivering one or more heat networks, and the Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstan’s College Jubilee Grounds. Again, it is recommended that strategic issues (e.g. heritage constraints) and opportunities are fed through into area and/or site-specific policy. Figure 9.4 is a schematic, taken from the Energy Masterplan, that serves to highlight the importance of early planning in order to capitalise on heat network opportunities. The proposal is for a ground array to feed heat to both a 4th generation network and a 5th generation (or ‘ambient’ loop, incorporating cooling) network.

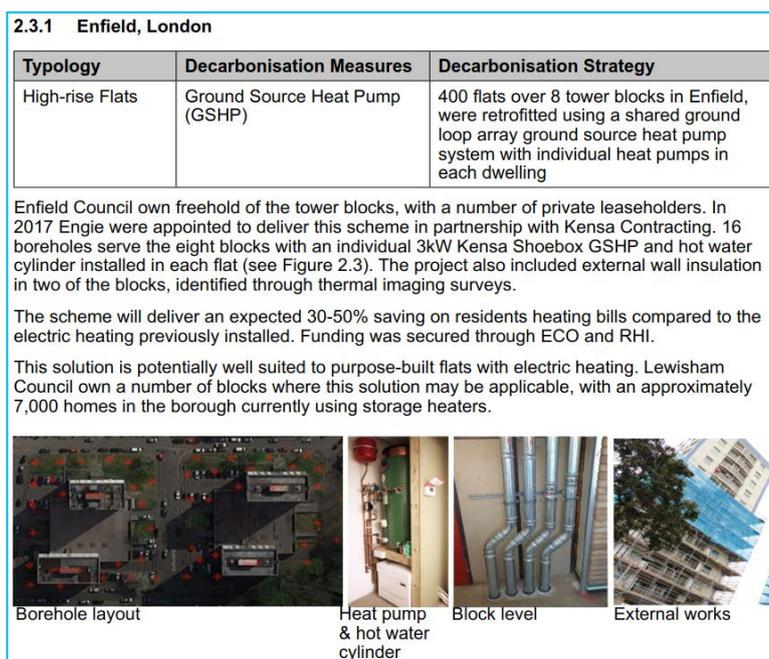
Figure 9.4: Heat network opportunities in Catford (from the Energy Masterplan, 2020)



9.5.4 With regards to Bell Green / Lower Sydenham, this is not a focus of the Energy Masterplan; however, there may nonetheless be a strategic heat network opportunity. The proposal is for comprehensive redevelopment within this area, particularly at the three adjacent Bell Green sites, which together would deliver in excess of 1,000 homes under a no BLE scenario (with the standard methodology used to assign indicative densities). This is a relatively unconstrained area, e.g. in comparison to Catford, hence there will be very good potential to deliver a heat network. The potential will be greatly enhanced under a BLE phase 2 scenario, as there will be the potential to deliver homes at much higher densities, and there will also be the potential to deliver a greater mix of uses, including as part of a new town centre. There could feasibly be an opportunity associated with linking a heat network to the SIL to the south, which falls within London Borough of Bromley, and the use of the adjacent river as a strategic heat source could be explored.

9.5.5 Aside from supporting heat networks, there is also a need to consider whether the spatial strategy is supportive of delivering standards of **sustainable design and construction** in exceedance of building regulations, which primarily means a efficiency / ventilation, so as to minimise the need for heating and cooling, and delivery of small scale and micro power generation, e.g. solar panels (sustainable design and construction also extends to ‘non-operational’ emissions, including embodied emissions, which are unregulated, i.e. not covered by building regulations). However, it is difficult to draw strong conclusions, in respect of implications of the spatial strategy. The proposed approach to density is carefully considered, and it is noted that the proposed approach to use mixes within any given site has been adjusted since the Draft Plan stage to support increased new residential (potentially supportive of development viability), but it is difficult to suggest this will translate into achievement of more ambitious sustainable design and construction standards. Amongst other things, it is difficult to conclude, with confidence, that taller buildings are supportive of minimising per capita emissions, as there can be a need for air conditioning to avoid summer overheating, and roof space for solar PV (‘be green’) will invariably be very limited. There can also be design challenges in respect of building level air source heat pump solutions, given the need to avoid visual and noise issues. However, on the other hand, tall buildings amount to high density development that can be supportive of district-level heat network delivery, and there are not known to be any particular challenges in respect of delivering heat network piping within tall buildings (see Figure 9.5). It is also fair to say that tall buildings will be major schemes where the developer will be expected to apply good / best practice in respect of the ‘be seen’ stage of the London Plan [energy hierarchy](#).

Figure 9.5: Heat network case study (from the Energy Masterplan, 2020)

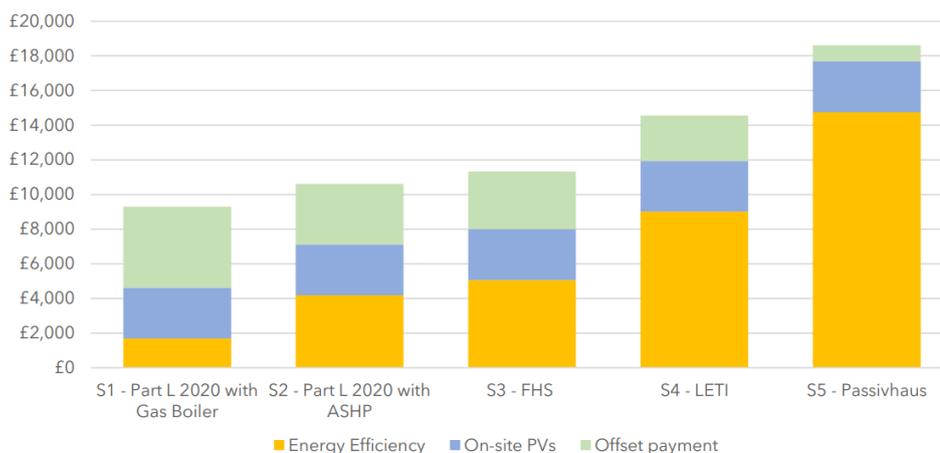


Commentary on other policies

- 9.5.6 Policy **SD1** (Responding to the climate emergency) commits to: *“A plan, manage and monitor process will be used to support the successful transition to a net zero-carbon Borough.”* The supporting text then goes on to explain: *“The Local Plan will play an important role in helping the Borough respond to the climate emergency. It provides the strategic framework for climate change mitigation and adaption in respect of the future use and management of land within Lewisham. It also sets out policies to ensure that new development is designed, constructed and operated in a sustainable way.”*
- 9.5.7 The Interim SA Report (2020) *“recommended that further detailed consideration is given to clarifying those climate change mitigation opportunities to be explored, and potentially realised, through proactive measures in the Local Plan (primarily around spatial strategy and site specific policy), versus those that can reasonably be left to the planning application process. This is a particular consideration in respect of heat networks, where understanding of best practice in the London context is evolving quite rapidly. In particular, there is increased recognition that gas fuelled combined heat and power (CHP) source heat networks are no longer a low carbon option, and that attention should not focus overly at on large scale heat networks (‘district heating’) at the expense of smaller scale (including ‘on plot’) schemes...”*

- 9.5.8 This recommendation holds true at the current time. Preparation of the Lewisham Energy Masterplan (2020) represented a proactive step, but there is a need to recognise that understanding of best practice is evolving at a fast pace. There is a need to consider departing from the London Plan, recognising that many London Plan policies were drafted several years ago (ahead of the 2017 Draft Plan consultation).
- 9.5.9 Having said this, Policy **SD2** (Sustainable design and retrofitting) has been notably supplemented, with a new emphasis on retrofitting. Retrofitting of existing homes is crucial to the achievement of sustainable development targets, given the contribution that domestic heating is set to make to national greenhouse gas emissions in the future (following EV switchover and national grid decarbonisation); however, there is a need to carefully consider the (limited) role of the planning system, and avoid unduly distracting from potentially more significant policy levers.
- 9.5.10 Policy **SD3** (Minimising greenhouse gas emissions) includes a focus on the approach to achieving 'net zero', which is a requirement for major developments. There is a new focus on 'embodied' emissions, which is strongly supported, with the Interim IIA Report (2020) emphasising: *"One increasing focus is on embodied emissions, i.e. non-operational greenhouse gas emissions associated with a building's lifecycle, covering: A) the emissions that have already occurred at the time a building is completed; and B) other 'locked in' non-operational emissions associated with subsequent stages of the building lifecycle (maintenance, repair, retrofitting, demolition and disposal). It is estimated that of the global cumulative CO2 emissions associated with new development that will occur between now and 2050, around half will result from the embodied emissions."* However, it does serve to raise the question of whether the proposed allocations include a focus on the re-use of buildings ahead of demolition and new build.
- 9.5.11 There is also a new emphasis on avoiding offsetting as far as possible, which is a matter examined via assessment of reasonable alternatives in Appendix IV. This is a very important principle; however, there are cost / viability implications.

Figure 9.6: Alternative approaches to achieving net zero²¹



- 9.5.12 Policy **SD4** (Energy infrastructure) is key to making the most of heat network opportunities. Focusing on CHP, the Interim SA Report recommended *"that policy support for CHP is closely scrutinised... as decarbonisation of the national grid now calls into question CHP as a low carbon technology. Steps should be taken to ensure that the Local Plan makes the most of the heat network opportunities discussed within the Energy Masterplan (2020), and there is also a need to keep understanding of best practice in the London context under close review."* The policy now states: *"Development proposals for CHP and ultra-low NOx gas boiler communal or district heating systems will only be acceptable where it is demonstrated that other options in the heating hierarchy have been fully investigated and are not feasible."*
- 9.5.13 Transport is also a significant contributor to the UK's greenhouse gas emissions. Transport is a focus of stand-alone discussion below, but in brief: Policy **TR1**(Sustainable transport and movement) seeks to promote active modes of travel and optimise connectivity and accessibility to public transport, in support of the London Plan's target of 80% of journeys to be made by public and active modes of transport; and Policy **TR4** (Parking) seeks to support the transition to less carbon intensive transport mix through reducing parking provisions, and also support the delivery of low emission vehicle charging infrastructure.

²¹ Basingstoke and Deane Council Climate Change Study (2021), see: www.basingstoke.gov.uk/content/doclib/3415.pdf

Assessment of the plan as a whole

- 9.5.14 Matters relating to minimising the need to travel and supporting modal shift and, in turn, minimising per capita greenhouse gas emissions from transport are a focus of discussion under other topic headings, such that the focus here is on minimising per capita emissions from the built environment. In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes and businesses that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of micro power generation, e.g. solar panels). Delivery of heat networks can prove challenging and costly, hence there is a need to realise opportunities through spatial strategy. This serves to highlight the strategic masterplanned redevelopment at BGLS as representing a clear opportunity, and there are also opportunities at Lewisham, Catford and in the north of the Borough that should be capitalised upon, in line with the Energy Masterplan.
- 9.5.15 With regards to the proposed DM policies, the plan notably includes policies on: Responding to the climate emergency; Sustainable design; Minimising greenhouse gas emissions; and Energy infrastructure. With regards to heat networks, there is a requirement that all proposals for major residential and commercial development will be expected to submit a feasibility assessment to “*fully evaluate connecting to an existing or planned future heat network where it is located on or in proximity to the site*”; however, there is a need to recall that opportunities will largely be dictated by spatial strategy in practice. With regards to sustainable design and construction, a range of stringent requirements are proposed, including in respect of achieving nationally recognised standards (Home Quality Mark, BREEAM) and offsetting mechanisms to enable achievement of ‘zero carbon’ major developments in-line with the emerging New London Plan policy. There may be a need for further work ahead of plan finalisation, to ensure a suitably ambitious approach, although it will be important to note the national and regional context and development viability.
- 9.5.16 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion at the Draft Plan stage. The Interim SA Report (2020) encouraged a proactive focus on realising built environment decarbonisation opportunities through spatial strategy and site specific policy, building upon the momentum created following the Energy Masterplan (2020), and recognising that this is a fast-moving policy area, but this had only occurred to a limited extent.

N.B. with regards to effect significance, one hand there is a need to recognise the urgency of supporting major interventions in support of climate change mitigation, as reflected in the Borough’s declaration of a Climate Emergency; however, on the other hand, climate change mitigation is a global issue such that local actions can only ever have a limited impact / significance.

9.6 Communities (accessibility)

Objective: Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.

Commentary on the spatial strategy

- 9.6.1 The proposed spatial strategy is broadly supported in that the aim is to focus growth on:
- Highly accessible areas - including town centres, where redevelopment can deliver an improved – and often expanded – offer in respect of town centre uses; and
 - Less accessible areas - where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration, where relative deprivation is closely linked to accessibility. The Local Plan explains: “*The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with comparatively fewer community facilities and local employment opportunities than elsewhere in the Borough. This means that residents often have to travel out of the area to access key services and jobs. The area experiences some of the Borough’s highest levels of deprivation...*”
- 9.6.2 A second overarching point to note is in respect of the approach taken to density and use mix:
- Density – is an important consideration, because non-residential uses, including town centre uses, will be delivered as a proportion of the total floorspace. There have been numerous adjustments to density at specific allocations since the Draft Plan stage.

- Use mix – has been a focus of further detailed work since the Draft Plan stage, taking close account of consultation responses received, including from the development industry (also wider engagement, e.g. through pre-application discussions) and the findings of the Town Centre Trends Study (2021).

9.6.3 Having made these initial points, the following bullet points give consideration to select detailed aspects, including a focus on changes to **use mix** since the Draft Plan stage.:

- **Lewisham** - a key site is Lewisham Shopping Centre, where the proposal is for a high density scheme that will ensure a net gain in main town centre uses (currently nearly 45,000 m²), reflecting Lewisham's Metropolitan Centre aspirations. Specifically, the proposal is to deliver 60,291m² of town centre uses as well as 20,097m² employment. This proposed approach is unchanged from the Draft Plan stage.

Lewisham Gateway is another key site where the retail and employment floorspace figures have been significantly reduced since the draft plan stage, but that is only to bring the site into line with the planning consent. Specifically: employment uses have been reduced from 17,500m² to 1,525m² and town centre uses reduced from 25,500m² to 9,548m².

Also, the following sites are associated with notable changes to use mix, since the Draft Plan stage, but all are more peripheral to the town centre:

- Land at Connington Road (Tesco) - is uncommitted. The proposal here, relative to the Draft Plan stage, is to support increased housing (407 homes rather than 380) and reduced employment (1,900 m² rather than 3,800m²).
- 100-114 Loampit Vale - lies to the west of the town centre, and is notably uncommitted. The proposal is to deliver reduced employment and increased town centre uses, relative to the Draft Plan.
- Silver Road and Axion House - was granted planning consent in 2020, subsequent to the Draft Plan consultation. Whilst the Draft Plan envisaged 370m² employment, the planning consent includes nil, although it does include more town centre uses than envisaged in the Draft Plan.
- **A21 corridor** – a key uncommitted site is Land at Engate Street, which is located just to the south of Lewisham town centre, and where the latest proposal, following work through the A21 framework, is to deliver reduced housing but increased town centre uses. Specifically, the proposal is for ~2,000m² town centre uses, whilst no town centre uses were proposed at the Draft Plan stage.

Another site of note is PLACE/Ladywell (former Ladywell Leisure Centre), which is at the pre-application stage. The latest proposal is to deliver a more modest scheme, involving fewer homes and more than a 50% reduction in employment and town centre floorspace.

- **Hither Green** - Land at Nightingale Grove and Maythorne Cottages is now consented, and is set to deliver fewer homes and considerably less employment floorspace than envisaged at the Draft Plan stage (179m², as opposed to 1,440 m²).
- **Catford** – the proposal is to take a masterplanning approach to assigning indicative residential densities to the four sites that fall within the Catford Town Centre Masterplan Area, on the basis that this will be supportive of wide ranging regeneration objectives for the town centre. This approach is supported, recognising that the town centre and surrounds are associated with a notable concentration of relative deprivation. However, there is a need to apply a degree of caution, mindful of “civic and cultural heart of the Borough” role that Catford plays in the settlement hierarchy, complimentary to the role of Lewisham. The vision from the Catford Town Centre Masterplan explains: *“As well as an established community with a strong sense of identity, in recent years Catford town centre has expanded its offer and appeal to a broader group of people. It has an informality that is a draw and a comfort for many.”*

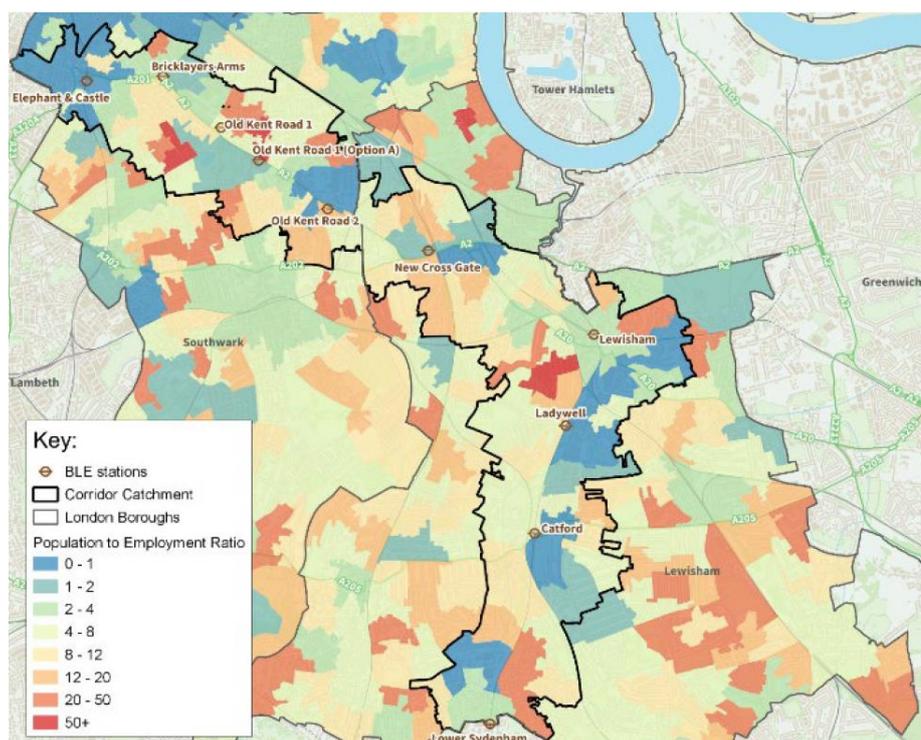
Significant adjustments have been made to use mix at: Catford Shopping Centre and Milford Towers – a significant increase in main town centre uses; and Ravensbourne Retail Park (located some way distant from the town centre) – a significant increase in employment, but decrease in town centre uses.

- **New Cross** - at both the main allocations, the proposal is now to support reduced town centre uses and increased employment, relative to the Draft Plan Stage.
- **North of the Borough** – a number of adjustments have been made since the Draft Plan, in order to reflect planning consents that are in place, serving to highlight the challenge that presents itself.
 - Convoys Wharf MEL – the employment floorspace has been increased from 15,000m² to 17,700m².
 - Surrey Canal Triangle MEL - town centre uses increased from 32,000m² to 46,500m².

- Deptford Landings MEL and Scott House - the employment floorspace has been increased from 5,400m² to 11,800m², and town centre uses reduced from 5,000m² to nil.
- Creekside Village East, Thanet Wharf MEL - was granted resolution to approve consent in November 2020. Whilst the Draft Plan envisaged 757m² town centre uses, the consent is for nearly 8,000m².
- **Bell Green / Lower Sydenham** – falls within the defined Strategic Area of Regeneration, hence there is support for the proposed comprehensive redevelopment of this area, which should bring with it community infrastructure upgrades and new employment opportunities. In particular, in respect of a higher growth / BLE Phase 2 scenario, the BLE Local Economic Impact Assessment (LEIA, 2020) identifies that a BLE station would bring with it a ‘dramatic rise’ in the Healthy Streets score currently assigned to immediate environs of Lower Sydenham Station, and it may be that a masterplanned higher growth strategy for the area could lead to benefits over-and-above those envisaged by the LEIA. It is also likely that a higher growth strategy could help to ensure that benefits accrue for existing communities well-beyond the 1km zone, surrounding the station, that is the focus of the LEIA – see Figure 9.7 – with this wider ‘hinterland’ being associated with a notably high population to employment ratio, amongst other indicators of relative deprivation. Higher density development could bring with it a new centre, which could significantly improve the ability of nearby communities to access services, facilities, retail and employment. The new community would also benefit from excellent access to green and blue infrastructure, in the London context, with the Pool River adjacent and Beckenham Place Park (which could form part of a new Regional Park) a short distance to the south.

With regards to changes since the Draft Plan, the following are of note: Catford Police Station – there is support for increased employment, but no longer town centre uses; and Beadles Garage – as above.

Figure 9.7: Areas of high population to employment ratio and BLE 1km buffer



- Another notable opportunity is associated with **Lee Green** district town centre, where there is a cluster of three proposed allocations, including Leegate Shopping centre (for which a planning application was submitted in 2018) and the adjacent Lee Green Sainsbury’s site. This area is associated with a degree of relative deprivation, in an otherwise more affluent part of the Borough. The Local Plan explains that: *“Development proposals must demonstrate how they will contribute to securing the long-term vitality and viability of Lee Green District centre, including by enhancing the place qualities of the centre as well as reinforcing its role as a key focal point for community activity in the East Area. Development proposals must contribute to a coordinated process of town centre renewal that responds positively to the area’s distinctive character. They must also deliver a complementary mix of main town centre uses, along with new housing, whilst ensuring that the centre’s predominant commercial and community role is maintained and enhanced.”* There could be benefit to masterplanning the sites in combination, however this may be a challenge given the current application for Leegate Shopping Centre.

At Leegate shopping centre it is understood that the proposed scheme would result in a net loss of town centre uses. However, it is noted that the proposal for the adjacent Sainsbury's site has been adjusted, since the Draft Plan stage, to require modestly reduced residential / increased employment uses onsite.

- Finally, it is important to note that there are clusters of proposed allocations at other district and local centres, namely **Brockley**, **Forest Hill** and **Sydenham** in the west of the Borough, and **Grove Park** in the east, with the proposed strategy for Grove Park local centre of particular note. Grove Park local centre serves both Grove Park to the east and Downham to the west. Downham falls within the Strategic Area of Regeneration and Grove Park is also associated with certain issue, with the Local Plan explaining: *“Grove Park is located to the southeast of the Borough and is somewhat disconnected from its surrounding neighbourhoods. This is in part owing to railway lines to the northeast and southwest, as well as the South Circular, which create physical barriers to movement and contribute to severance.”*

The proposed allocation - Sainsbury Local and West of Grove Park Station - comprises of a number of sites located within Grove Park local centre, which are currently occupied by a range of main town centre uses along with a petrol station, bus station and housing. An ambitious approach is proposed in respect of assembling sites in order to deliver a comprehensive (albeit small scale; net 78 homes) redevelopment to support the long-term vitality and viability of the local centre – see Figure 9.8.

Figure 9.8: Proposed allocation at Grove Park



- 9.6.4 Another local centre of note is **Hither Green**, in the east of the Borough. There is a new added emphasis in the Local Plan (relative to the Draft Plan stage) on setting out a clear strategy for sensitive intensification of the area through small sites development to ‘reinforce’ the existing local character and enhance the vitality and viability of commercial areas. This is in light of consultation responses received in 2020, and specifically in recognition that the rail lines creates severance and limit connectivity, and the station approach to the west of the station has poorer quality public realm. One of the proposed allocations from the Draft Plan (2020) is now consented for 22 homes (with the Draft Plan having anticipated 42 homes), whilst the other is supported for 40 homes in line with the London Plan SHLAA methodology.
- 9.6.5 Finally, there is a need to consider the implications of mixed use redevelopment of **sites that currently comprise a community use** (outside of a town centre). The following sites are of note:
- Sydenham Green Group Practice comprises an existing large health centre adjacent to the proposed BGLS strategic growth area. However, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure. This is one of the sites within BGLS identified as having the potential to deliver a considerably higher density scheme under a BLE Phase 2 scenario. However, relative to the Draft Plan stage there is now an assumption for a split of uses more weighted towards non-housing uses (50%).
 - Jenner Health Centre, in the west of the Borough, does not fall within a strategic growth area, hence there is less to be gained by redevelopment. However, it is again fair to assume that health infrastructure will be sufficiently re-provided as part of the redevelopment, hence there are limited concerns and, indeed, potentially no concerns beyond short term impacts during the construction phase. Again, the updated proposal is for increased non-housing uses (50%) as part of the uses split onsite.

- Catford Police Station - there are no concerns in this regard, as it is certainly fair to assume that police operational capacity will not be unduly impacted by allocation and redevelopment of the site (and this is a stated requirement within site-specific policy).
- 9.6.6 Also of note is Riverside Youth Club and 2000 Community Centre, in the north of the Borough, which was an allocation in the Draft Plan, but which is now no longer available for redevelopment. The proposal at the Draft Plan stage was for 72 homes, with site specific policy requiring: *“The operational requirements of the retail and community/leisure uses across the site should be taken into account.”*
- 9.6.7 There is also a need to note the strategy in respect of mixed use redevelopment of out-of-centre retail facilities, notably Ravensbourne Retail Park, Bell Green Retail Park, Homebase/Argos Bromley Road and Bestway Cash and Carry. Whilst recognising there is a need for additional retail floorspace in the Borough over the plan period, Lewisham’s Retail Capacity Study Update (2019) identifies that this capacity can be accommodated within the existing town centre network, particularly at Lewisham and Catford centres, and forecasts a future reduction in the need for out-of-centre retail floorspace. Having said this, it is worth noting that redevelopment of existing out-of-centre retail areas will tend to be for mixed use schemes that include re-provision of retail, particularly at BGLS.
- 9.6.8 Other commercial uses are also set to be lost, including car servicing and builder’s merchants, and several car parks are proposed for redevelopment. In the great majority of cases there is a clear strategic argument for redevelopment that extends well beyond simply housing delivery.

Commentary on other policies

- 9.6.9 The set of ‘Community Infrastructure’ policies seek to protect existing and provide new infrastructure, e.g.
- Policy **CI1** (Safeguarding and securing community infrastructure) sets out Lewisham’s approach to identifying current and future requirements, including for healthcare, education, recreation and other community services. It explains:

“Major development proposals will be expected to, and all other development proposals should, plan positively to meet local needs for community infrastructure. Where a site allocation policy sets out requirements for community infrastructure, development proposals will be required to demonstrate how the delivery of this infrastructure will be secured through the masterplan process, with reference to Policy DM3 (Masterplans and comprehensive redevelopment). Elsewhere, development proposals must demonstrate how any additional demands for community infrastructure generated by the development will be appropriately addressed, particularly in those areas where there is an identified need for additional provision, as set out in the Infrastructure Delivery Plan.”

There is also new emphasis on different routes for addressing community infrastructure: *“Consideration should be given to the delivery of new or enhanced infrastructure on-site or, where appropriate, off-site contributions which support the expansion of capacity of existing facilities or improvements to them.”*
 - Policy **CI2** (High quality community infrastructure) sets out detailed requirements for how proposals should consider improving existing facilities, including access, saying proposals should ensure *“the site and building is appropriately located for the intended use and is easily accessible by public transport, walking and cycling”*. It importantly notes that the facility should not restrict access to the wider community; this is an important consideration from a community cohesion perspective.
 - Policies **CR3** (Sports, recreation and play) and **CR4** (Nurseries and childcare facilities) are also important from a perspective ensuring access to high quality facilities. Policy CR3 notably maps out play space deficiency across the Borough and elaborates on the London Plan requirement for at least 10 square metres formal play provision per child in new developments. The following policy requirement is new, since the Draft Plan stage, and is strongly supported: *“Where located in areas with identified deficiencies in play space, new housing development must provide demonstrable improvements in the quantity and quality of play space.”* There is also a new emphasis on playing pitches strategy, following a consultation response received from Sports England.
- 9.6.10 Numerous policies within the ‘High quality design’ section of the plan seek to ensure high quality public and private space. Notably:
- Policy **QD1** (Delivering high quality design in Lewisham) includes a sub-section entitled *“Places for People”*, which notes that new proposals must be designed to ensure *“buildings and spaces are welcoming, inclusive, safe and accessible to people of all backgrounds, ages and abilities.”*

- Policy **QD2** (Inclusive and safe design) states that *“Development proposals must positively respond to the diversity and varied needs of Lewisham’s population...”* This emphasises the need for buildings and spaces to be accessible to all members of the public, including those that can face access barriers.
- Policy **QD3** (Public realm and connecting places) states that public realm should maximise opportunities to improve connections to existing or proposed community infrastructure and where appropriate make provisions for infrastructure such as water fountains, public conveniences, shading and public art.
- Policy **QD6** (Optimising site capacity) directly address the need for new infrastructure to support growth, saying that proposals should have regard to the *“capacity of infrastructure to support the land uses and density proposed, having regard to the individual and cumulative impacts of development.”* The Local Plan assigns an assumed use mix split to all allocations, however the policy explains:

“Where development proposals do not accord with the indicative capacity set out in a site allocation policy, they will only be supported where it is clearly demonstrated the optimal capacity will be achieved, having regard to [stated policy criteria].”

- 9.6.11 Finally, there is a need to note extensive changes, throughout the plan, following new planning legislation. This includes changes to the Use Classes Order which has extended the scope of permitted development rights. This effectively allows greater flexibility for changes between different uses and limits the ability of the Local Plan to control the specific mix of uses within centres and shopping parades etc.

Assessment of the plan as a whole

- 9.6.12 The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration. Specific points of support relate to the proposed strategy for: Catford, where an ambitious approach to regeneration is supported, in accordance with the Catford Town Centre Masterplan; Bell Green / Lower Sydenham (BGLS), where an ambitious approach to growth should benefit the wider south of the Borough, including the Strategic Area of Regeneration (although there is a need for further work to confirm the extent to which benefits will extend beyond the immediate station surrounds); and the proposed clustering of proposed allocations at district and local centres is strongly supported, notably at Lee Green and Grove Park.
- 9.6.13 With regards to changes to use mixes, since the Draft Plan stage, it is understood that these often reflect the findings of detailed studies including the Town Centre Trends Study (2021). However, it is difficult to reach an overall conclusion on the merits of the changes, from a ‘communities (accessibility)’ perspective. Certain aspects are clearly supported, such as the proposed approach to Lewisham Shopping Centre, and a clear rationale is also apparent for sites such as: Land at Engate Street; Catford Shopping Centre and Milford Towers; and Ravensbourne Retail Park. However, overall there would be merit to further work to clarify the strategy, taking account of the latest position in respect of delivery of non-residential uses at major committed sites. It is recognised that assigning indicative use mix requirements is a challenging aspect of plan-making, because of the need for site-specific discussions (i.e. discussion on what non-residential uses can viably be retained / re-provided / provided, mindful that the landowner require a financial incentive to re-develop the site, and this incentive comes from residential uses, with density / building height implications) and because of the constantly shifting baseline in respect of consents.
- 9.6.14 With regards to the proposed DM policies, the plan notably includes a suite of ‘Community infrastructure’ focused policies, which present firm commitments in respect of safeguarding existing community infrastructure alongside delivery of new and enhanced community infrastructure; and wide-ranging other proposed policies are also supportive of accessibility objectives, including the suites of policies presented within the ‘Green infrastructure’ and ‘Transport and connectivity’ sections of the plan.
- 9.6.15 In conclusion, **significant positive effects** are predicted, albeit noting the potential to take steps to ensure the Local Plan performs even more positively ahead of plan finalisation. This is as per the conclusion reached at the Draft Plan stage, although it is important to note that changes since the Draft Plan change do give rise to certain tensions, most notably the new proposed approach to calculating use mix.

Figure 9.9: A recent mixed use development in Lewisham



9.7 Communities (housing)

Objective: Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.

Commentary on the spatial strategy

- 9.7.1 The total capacity of the proposed allocations is circa 24,400 homes, and it is expected that all of these sites will be delivered within the plan period. Additional supply over the plan period (2020/21 to 2039/40) then comes from: large consented sites that do not require an allocation (~1,500 homes), some of which have delivered or are started to deliver; and small sites (~7,370 homes; comprising those that have delivered, those that are consented and a windfall assumption for the latter years of the plan period). In total, therefore, the total proposed supply over the 20 year plan period is **~33,300 homes**, or **1,665 dpa**.
- 9.7.2 This broadly aligns with the London Plan target figure of 1,667 dpa; however, there are two further considerations. Firstly, there is a need to consider the **trajectory** of housing delivery across the plan period, namely the fact that it is naturally weighted more towards earlier years. Secondly, there is a need to consider the need for a **supply buffer** over-and-above the housing target/requirement that is committed to for the purposes of monitoring performance in terms of five year housing land supply and Housing Delivery Test (HDT). This reflects the inevitability of some sites in the supply not delivering as anticipated.
- 9.7.3 Focusing on the **ten year period 2019/20 to 2028/29**, which is the period over which there is a need to meet the housing target set by the London Plan (1,667 dpa, or 16,670 in total), the proposed supply is 19,555, i.e. there is a 'supply buffer' of 17% to account for delivery issues. This is a healthy supply buffer, such that there is no issue with committing to 1,667 dpa as a 'requirement' for monitoring purposes.
- 9.7.4 Another key timescale is the **first five years post plan adoption**, namely the period 2023/24 to 2027/28. Lewisham's target is 2,112 dpa (10,560 in total) comprising: the London Plan target (1,667 dpa); a backlog of undersupply against the London Plan target since 2019/20; and a 5% buffer (to reflect given Lewisham's 87% performance in the last HDT). The proposed supply is 12,838, i.e. there is a 'supply buffer' of 22% to account for delivery issues, which is a healthy supply buffer.

- 9.7.5 A final key timescale is **the first 15 years of the plan period**, given NPPF paragraph 68. The requirement for this period, on the basis of the discussion above, is 27,230 homes (2,112 dpa for years 1-5, then 1,667 dpa for years 6-15), whilst the proposed supply is 27,889, amounting to a supply buffer of 2%. This is a modest supply buffer, but this does not give rise to a concern, given that the NPPF allows for flexibility over the latter years of the plan period, recognising the requirement for a five yearly local plan review.
- 9.7.6 The proposal is also to ensure flexibility to deliver higher growth under a scenario whereby the **BLE** is delivered in the plan period, which is supported from a 'housing' perspective, as housing needs are understood to be in excess of the London Plan Target (according to the SHMA, 2022), and additional market housing would also lead to delivery of additional affordable housing, for which there is a very high need (the SHMA identified a need for 2,818 affordable dwellings per year, and the policy proposal is for qualifying market housing schemes to deliver 50% affordable housing). Under a BLE scenario there is a need to consider whether the housing requirement (for monitoring and evaluation purposes) would be raised and, if so, what an appropriate supply buffer would be, mindful of BLE related delivery risks.
- 9.7.7 The proposed boost to small sites delivery, compared to past trends, is also supported, from a 'housing' perspective. Specifically, the proposal is to meet the London Plan target of 379 dpa, which compares to just 133 homes in the most recent monitoring year, and 241 homes in the year prior to that. Small sites are key to ensuring a diverse housing market, in terms of both type of housing 'product' and geographical location. Notably, small sites will be important in terms of meeting localised housing needs in the southeast of the Borough, where there are few allocations. There is a supportive policy framework for small sites development set out in the plan, and within the Small Sites SPD (2021).

Figure 9.10: A scheme in Lee, highlighted within the Small Sites SPD



- 9.7.8 The spatial strategy does also potentially have implications for other 'housing' related matters; however, these are considered to be of secondary importance, relative to the matter of total housing quantum. One important consideration is that which is a focus of the BLE LEIA (2020), namely that under BLE scenarios house prices locally will increase in the vicinity of BLE stations, thereby leading to more residents in need of **affordable housing**, which, in turn, suggests a need to support a higher housing growth strategy locally. The LEIA identifies a particular issue in Catford, stating: *"Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing."*
- 9.7.9 Provision for **specialist housing** needs is another consideration, although this is a focus of only one of the proposed allocations, namely Featherstone Lodge, Eliot Bank, which is proposed for older person's accommodation. Other specialist housing needs are dealt with through development management policy (see discussion below). The Interim SA Report (2020) stated *"there will be a need for further work ahead of plan finalisation to confirm that there is not a need for the Local Plan to take a more proactive approach through site allocation"* – see further discussion below.

- 9.7.10 Finally, there is a need to consider the proposed strategy in respect of meeting **gypsy and traveller accommodation needs**. The background is as follows:

The Lewisham Gypsy and Traveller Accommodation Assessment (2015 and amended 2016) identifies a minimum need for six pitches within the plan period, arising from people currently living in bricks and mortar homes, teenage children and household formation. Having regard to this assessment, the Council commenced preparation of a Gypsy and Traveller Site Local Plan. This set out the approach to meeting identified local need for this group, including through site allocation policies. A Preferred Site Consultation was then over six weeks in 2018. Consultation responses have been considered and negotiations with landowners are progressing. This is particularly to ensure that any future proposed site is deliverable for the intended use, and that feedback from the wider public is appropriately addressed.

- 9.7.11 In light of the above, the Draft Local Plan proposes an allocation at Pool Court, which is a 0.3 ha site located to just to the southwest of the Catford Masterplan area; specifically, to the south of the large proposed allocation at Wickes and Halfords, Catford Road. The site comprises a 'left over' triangle of land at the point where the two railways south of Catford cross-over one another. The River Ravensbourne borders the site, and the confluence of the rivers Ravensbourne and Pool is near adjacent to the west of the site (separated by the railway); however, the site is shown intersect flood zone 2 (as opposed to flood zone 3, which constrains Wickes and Halfords, Catford Road), presumably because the river is effectively channelled or culverted at this point. A related constraint is the on-site local nature conservation (SINC) designation, and it is important to consider the biodiversity value of this site not only isolation, but as one element of the ecological network associated with the Ravensbourne and Pool river valleys (see discussion of the Wickes and Halfords site above, under 'Biodiversity'). Whilst it is recognised that this site has been identified following a site selection process undertaken over a number of years, given the onsite constraints, it is recommended that further detailed assessments of biodiversity and flood risk are undertaken, with additional requirements/guidance included within the site allocation, as appropriate; the council should also continue to explore other opportunities to meet the housing needs of this group. This recommendation reflects the consultation response received from the GLA in 2020.

Commentary on other policies

- 9.7.12 Section 7 of the Local Plan is focused on Housing, with ten policies proposed.
- 9.7.13 Beginning with Policy **HO1** (Meeting Lewisham's housing needs), this policy sets out the strategic approach to ensuring that housing needs are met. In addition to the matter of setting a housing requirement, and a supply to ensure that the requirement is met in practice (discussed above), the policy deals with ensuring "inclusive and mixed neighbourhoods and communities". Relative to the Draft Plan stage, there are stronger requirements for family housing, and there are new specific targets for affordable housing types and tenures, informed by SHMA update 2021.
- 9.7.14 Policy **HO2** (Optimising the use of small housing sites) is also of central importance. The aim is to boost the delivery of small housing development beyond the historic delivery levels, in light of the NPPF emphasis on diversifying the supply of sites (and mindful of the ambitious approach proposed by the draft London Plan, 2017). Small sites can play an important role in addressing local deprivation. For instance, the designated Area for Regeneration in the south of the Borough, which has a distinctive character and urban grain based on its historic estate development, is associated with a lack of large site opportunities to generate investment in this area. Small site development provides a mechanism for more incremental investment and real improvement that can help to address the underlying causes of deprivation.
- 9.7.15 Delivery of genuinely affordable housing is a clear corporate priority for the Borough Council, and this is reflected in the Policy **HO3**, with the following being a key statement made within the supporting text:

"The Local Plan sets a strategic target for 50 per cent of all new homes delivered in the Borough to be genuinely affordable. The strategic target is considered to be in line with the London Plan. However, recognising the distinctive characteristics of the local housing market and the relative affordability of different types of provision to the resident population, a local definition of 'genuinely affordable housing' is necessary. In Lewisham, this means housing at social rent levels or GLA's London Affordable Rent level and below, aiming for target rents. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing, and should not be conflated with genuinely affordable housing."

- 9.7.16 Since the Draft Plan stage there is a new requirement to reflect the new Government policy on First Homes – a specific kind of discounted market sale housing – with implications for provision of other forms of affordable housing, potentially including forms aimed at meeting the needs of those in the most acute housing need. In addition, there is more detail in respect of collecting affordable housing contributions from small sites; and there is also important detail regarding a threshold approach to viability, in line with the London Plan. The threshold approach allows proposals to be fast tracked past the detailed viability stage if they meet the threshold.
- 9.7.17 Policy **HO4** (Housing estate maintenance, renewal and regeneration) seeks to ensure that estate regeneration schemes do not result in a loss of affordable housing and where possible delivers an uplift in genuinely affordable housing. The policy also sets out a design standard which estate regeneration must meet, requiring that *“development is of a high-quality design and provides for demonstrable physical improvements to the housing estate and local area environment, consistent with other Local Plan policies”*. Large scale estate regeneration is more likely to occur in more deprived areas; therefore, this policy approach could contribute to delivery of improved quality living environments in more deprived areas.
- 9.7.18 Policies **HO5** (Accommodation for older people), **HO6** (Supported and specialised accommodation), **HO7** (Purpose built student accommodation), **HO8** (Housing with shared facilities [Houses in Multiple Occupation]), **HO9** (Self-build and custom-build housing) and **HO10** (Gypsy and traveller accommodation) all focus on different areas of specialist housing need. For example, policy **HO5** acknowledges the growing pressure of delivering housing infrastructure for older people, noting the need to match supply for the over 65 population which is estimated to rise by 50% by 2033. All of these policies note that specialist housing should be accessible and benefit from good provisions of social and physical infrastructure.
- 9.7.19 With regards to accommodation for older people, the policy takes on added importance in light of the SHMA (2022), which indicates that - whilst there are a number of housing options available for older people - additional capacity is required. The total additional need for specialist older person dwellings is projected to be 2,422 by 2040, which breaks down as 1,969 units of Class C3 units (such as sheltered or extra care housing) and 453 units of Class C2 units (such as residential care). This translates to an annual need for 98 C3 dwellings plus 23 units of C2 dwellings each year, which is comparable to the London Plan benchmark for Lewisham of 100 specialist older person dwellings 2017 to 2029.
- 9.7.20 Purpose build student accommodation (PBSA) is another challenging policy area. In short, whilst there are clear benefits to providing PBSA in Lewisham, there is need to account for the existing supply and avoid over-concentration, which leads to issues for the wider community.
- 9.7.21 Finally, with regards to HMOs, the Lewisham Strategic Housing Market Assessment (2022) indicates that HMOs have contributed to making available a wider range of housing options and can continue to play a role in meeting local housing needs. However this type of provision must be carefully managed in order to ensure high quality housing that supports mixed and inclusive neighbourhoods and communities. The latest 2022 review concludes that there has been a significant increase in HMOs in Lewisham since 2018, with evidence to suggest this has resulted in adverse impacts on local amenity. With regards to ensuring high quality housing for occupants, the latest version of the policy is amended to appropriately reflect that HMOs are a specialist form of accommodation and do not have the same space standards as conventional housing units, but there is retained reference to national HMO standards and Council’s licencing scheme.

Assessment of the plan as a whole

- 9.7.22 With regards to the spatial strategy, the identified supply is sufficient to enable the housing requirement to be set at the level of the London Plan housing target (1,667 homes per annum) over the entirety of the plan period, with a healthy supply buffer to reflect delivery risks. The proposal is also to ensure flexibility to deliver higher growth under a scenario whereby the BLE comes forward, which is supported as housing needs are understood to be in excess of the London Plan Target, and additional market housing would also lead to delivery of additional affordable housing, helping to address acute needs that exist. Further considerations relate to provision for small sites, specialist housing needs (with one allocation proposed for older persons accommodation), and gypsy and traveller accommodation (one allocation is proposed).

- 9.7.23 With regards to the proposed DM policies, the Local Plan includes a section dedicated to Housing, comprising ten separate policies covering topics including: Genuinely affordable housing; Housing estate maintenance, renewal and regeneration; Accommodation for older people; Supported accommodation; Purpose built student accommodation; Housing with shared facilities (Houses in Multiple Occupation); and Gypsy and traveller accommodation. Delivery of genuinely affordable housing is a clear corporate priority for the Borough Council, and this is reflected in the Policy HO3, which sets a strategic target for 50% of all new homes delivered in the Borough to be genuinely affordable, as well as a local definition of 'genuinely affordable housing', although there is now a need to account for national policy on First Homes.
- 9.7.24 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. This is as per the conclusion reached at the Draft Plan stage. Focusing on total supply, the broad approach is largely unchanged from the Draft Plan stage, with: several proposed allocations from that stage now having been removed from the plan; just one new proposed allocation for residential (which has planning consent); and amended densities / use max calculations at a number of sites (including, where necessary, an increased emphasis on residential uses, which should be support of development viability).

9.8 Communities (wider issues)

Objective: Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.

Commentary on the spatial strategy

- 9.8.1 There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough's most deprived areas. Issues are particularly acute within the Strategic Area of Regeneration (SAR), which has the potential to benefit from growth targeted at Bell Green / Lower Sydenham, particularly under a BLE Phase 2 scenario, under which the Local Plan is supportive of a higher growth strategy. The BLE LEIA (2020) is supportive of the BLE to Lower Sydenham, including because the area *"has seen the largest increase in the number of claimants in the Corridor by a significant margin - a 21% increase in claimants is over 5 times the Corridor average"*, and it is fair to suggest that benefits would A) extend beyond the immediate station environs (the area which is the focus of the LEIA) and B) would be enhanced under a higher growth scenario. Specifically, a higher growth scenario could support some or all of the following SAR priorities:
- *"Enhancing provision of and access to high quality public transport infrastructure, including bus services;*
 - *Addressing barriers to movement by enhancing the network of walking routes and cycleways connecting to transport nodes, town and local centres, schools and training facilities, and employment locations;*
 - *Plan positively for social infrastructure to meet local needs, particularly community facilities and services catered to children and young people;*
 - *Support the vitality and viability of town and local centres, helping to ensure they make provision for a wide range of accessible shops and services;*
 - *Improve the environmental quality of neighbourhoods, including by reducing and mitigating pollution along main roads and junctions."*
- 9.8.2 Access to high quality community infrastructure is critical and has been discussed above under the **'Accessibility'** heading, as has the related matter of improving access to transport infrastructure and improving the quality and permeability of the urban realm. Another closely related matter is access to green infrastructure, which has been discussed above under **'Biodiversity and green infrastructure'**. Under both headings there has been a discussion of issues and opportunities associated with the defined Strategic Area of Regeneration in the Southeast of the Borough,

- 9.8.3 Access to high quality housing, including family housing, affordable housing and specialist housing, is also key, and has been discussed above under the ‘**Housing**’ heading, noting that the provision of sufficient high quality affordable housing is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.²² Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.
- 9.8.4 **Air and noise pollution** is another matter discussed above with wide range health and wellbeing implications. Beyond the matter of minimising car movements and resulting pollution (which is the focus of discussion above), the recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, and in particular air and noise pollution, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects).²³ Addressing the quality of the urban realm in Catford and Lewisham, and also along the A21 corridor, is a focus of discussion above, including in respect of access to rivers and open space.
- 9.8.5 Further key considerations relate to the **Economy**, as discussed below. One key consideration is avoiding loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being “*characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.*”
- 9.8.6 The proposed regeneration of **Catford town centre** warrants a particular focus, given that the scale of change will have significant implications for existing communities and businesses in the area, which the Town Centre Masterplan describes as being associated with “*an established community with a strong sense of identity*” and an “*informality that is a draw and a comfort for many.*” Points to consider include:
- Overall strategy – there is certainly a need for regeneration, given a range of specific issues, notably: the dominance of the South Circular/Catford Road and surrounding road network, which has a major impact on environmental quality and the cohesiveness of the town centre; a poor sense of arrival into the town centre; a shopping mall that is hidden and inward-looking and provides a limited retail offer; Milford Towers that are in a poor state of repair; and a dispersed and poorly linked set of Council offices that would benefit from being reconfigured and consolidated.
- The broad proposal to deliver a new cultural and civic hub and surrounding retail area – see Figure 9.9 – is also supported, as are ambition statements including: “*The ambition is to reinforce Catford's point of difference as a cultural destination and to improve and diversify the leisure offer and the night-time economy...*” A key issue is clearly reflecting the needs of existing communities and businesses, ensuring they are able to adapt and thrive during and following the regeneration.
- The Yards – this area is described as hosting “an eclectic mix of buildings from different eras”, which could, in turn, suggest that this area is associated with community and business diversity, although it is recognised that the overall conclusion reached by the Masterplan is that: “*The area as a whole is underutilised and underdeveloped*”. The objective for the area is “*to become a creative and entrepreneurial cluster for Catford's existing and future independent businesses, providing a range of spaces with a street presence*” and the proposal to deliver “*external yard spaces [that are hard working and durable, and function as open air workshops for construction, creation and recreation]*”. This is supported, from an equalities perspective; however, again, there is a need to ensure that due consideration is given to avoiding and mitigating impacts to existing communities and businesses.
 - The Lanes – the emerging Masterplan notes that: “*Decanting of residents and shop owners has already started, and meanwhile uses such as Catford Mews are now activating the shopping centre until its phased demolition.*” If there are lessons to be learned from early work dealing with existing businesses and communities then it will be important that these feed-into future decision-making.

²² See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

²³ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

Figure 9.11: Proposed Catford hub (dark brown) and retail area (lighter brown)



- 9.8.7 A further consideration is **estate regeneration**, with this being a focus of three of the proposed allocations; however, two of the three allocations are committed, and indeed currently building-out. As for the uncommitted proposed allocation – Achilles Street – residents voted in support of estate regeneration in late 2019, such that the question for the Local Plan is now how it should happen, including in terms of development quantum. The latest proposal is for 363 homes at this 1.4 ha site, which is a reduction on the 651 homes anticipated at the Draft Plan stage, and is reflective of the findings of a residents ballot.

Figure 9.12: Recent estate regeneration



View development at Heathside and Lethbridge (BPTW)

- 9.8.8 Beyond these considerations there are wide-ranging issues to be addressed by the Local Plan. However, it is a challenge to identify any that relate strongly to the spatial strategy. Other key issues can be addressed through policy on matters such as use mixes in town / district centres, and through site specific policies that deal with use mixes, infrastructure delivery and design. These matters are largely independent of the spatial strategy, i.e. it should be that issues can be addressed and opportunities realised under any reasonably foreseeable scenario.
- 9.8.9 A final discrete matter for consideration here is the matter of boat dwellers, with policy set through **LNA4** (Thames Policy Area and Deptford Creekside). The policy now requires: *“Consideration must be given to the requirements of the existing boating community and Creekside’s continued role in accommodating boat dwellings to help meet housing needs.”* The Port of London Authority’s Thames Vision highlights the southern part of Deptford Creek as a potential Residential Mooring Opportunity Zone.

Commentary on other policies

- 9.8.10 Developing strong communities is a central aim of the design led policies **QD1** (Delivering high quality design in Lewisham), **QD2** (Inclusive and safe design) and **QD3** (Public realm and connecting places). Notably:

- Policy **QD1** is focused primarily on ensuring ‘the design-led approach’, defined as:

“The design-led approach requires that, from the very start of the planning and design process, careful consideration is given to the distinctive features of Lewisham’s neighbourhoods, buildings and other spaces that shape local character and contribute positively to people’s sense of place and belonging. It also requires new development to respond to the ways in which people use and experience buildings and spaces, along with the impacts the built environment has on the health and wellbeing of the population. Finally, the design-led approach requires development to function effectively both on its own and in relation to the buildings and spaces around it.”

- Policy **QD2** emphasises that proposals should be accessible to all and that housing is designed to *“meet the different requirements of Lewisham’s resident population”* highlighting the need to provide for wheelchair users and other forms of accessible/adaptable dwellings to reduce the risk of exclusion.

The policy has been adjusted, since the Draft Plan stage, to include more emphasis on safety of particular groups, including the following: *“By applying Secure by Design principles development proposals can help to create safer public spaces, particularly children and young people and other groups, such as women and girls, for whom the design of the built environment can have significant impacts on personal security and perceptions of safety.”*

Also, there is now added emphasis on tenure neutral housing: *“... must be designed to maximise tenure integration and be ‘tenure neutral’, having regard to the National Design Guide or latest equivalent.”*

- Policy **QD3** (Public realm and connecting places) states that public realm should maximise opportunities to improve connections to existing or proposed community infrastructure and where appropriate make provisions for infrastructure such as water fountains, public conveniences, shading and public art.

- 9.8.11 Other key policies include those in respect of:

- Housing – Policy **HO1** (Meeting Lewisham’s housing needs) now requires an Inclusive Design Statement, and another key policy is **HO4** (Housing estate maintenance, renewal and regeneration), which emphasises the importance of meaningful consultation with the local community in the design and proposal of any estate renewal to ensure: *“Strong and inclusive communities can be better fostered and supported, with spaces and facilities that enhance opportunities for social interaction and integration”*.
- Economy - Policy **EC19** (Public houses) highlights the important social function public houses provide in supporting community cohesion; Policies **EC11** (Town centres at the heart of our communities), **EC15** (Local Centres), **EC18** (Culture, creative industries and the night-time economy) and **EC20** (Markets) acknowledge the important role the local economy has in terms of supporting local communities; Policy **EC17** (Concertation of uses) shows recognition that the local economy can contribute to good health through compliance with the Healthier Catering Commitment Standard as: *“Hot food takeaways are now recognised as an ongoing concern with respect to the wider systems approach to health and well-being.”* Policy EC17 has been notably amended, since the Draft Plan stage, to ensure account is taken of schools that have been consented but not yet built.

In addition, policies **EC1** (A thriving and inclusive local economy), **EC4** (low cost and affordable workspace) and **EC10** (Workspace training and job opportunities) focus on extending economic opportunities across the Borough. Providing job opportunities, training and affordable workspace can all be viewed as a means to deliver equality of opportunity. Policy **EC1** states that the Council is “committed to tackling inequalities by ensuring residents have access to good quality job opportunities along with education, skills and training”. Policy **EC9** sets out conditions for new developments to deliver equal working opportunities “All proposals for major development will be required to provide job and training opportunities to Lewisham residents, including apprenticeships.”

- Transport - through policy **TR1** (Sustainable transport and movement) the Local Plan also acknowledges that developing sustainable transport provisions and improving accessibility to public transport can support tackling local deprivation as it contributes to “ensuring equality of access to opportunities”.

Furthermore, both **TR1** and **TR3** (Healthy streets as part of a healthy neighbourhood) highlight the key link between good health and active modes of transport, demonstrated by the commitment to the Mayor of London’s Healthy Streets approach.

Also of note is Policy **TR7** (Digital connectivity), which has been amended to reflect the fact that barriers to connectivity are not limited to availability of infrastructure.

- 9.8.12 Finally, new Policy **DM6** (Health Impact Assessments) now requires that a desktop Health Impact Assessment (HIA) must be submitted with certain types of development proposals, namely major developments, developments located within an Air Quality Focus Area and development for certain specified uses (e.g. hot food takeaways).

Assessment of the plan as a whole

- 9.8.13 There is a pressing need to reduce inequality and address pockets of relative deprivation in the Borough, and to positively seek to ensure equality of opportunity for those living in the Borough’s most deprived areas. It is a challenge to identify aspects of the spatial strategy that relate strongly to equalities, health and ‘other community’ objectives. However, broadly speaking, key elements of the spatial strategy are: A) a focus on the Strategic Area of Regeneration (including support for a high growth strategy at BGLS under a BLE P2 scenario); B) support for growth, investment and regeneration within town centres, in particular Catford; and C) support for improved movement infrastructure and improved urban realm along transport corridors, including the A21. Other considerations relate to implications of the spatial strategy for access to employment opportunities, including for those with lower skills, and possibility of flood risk disproportionately impacting poorer neighbourhoods is a further consideration.
- 9.8.14 With regards to the proposed DM policies, the Local Plan includes requirements in respect of numerous matters that will help to ensure that development has the effect of reducing inequality, supporting good health and addressing pockets of relative deprivation and poor health in the Borough. As discussed above, stringent policies are proposed in respect of matters including community infrastructure, affordable and specialist housing needs, and policy in respect of air quality is also of note, as this is an important health related consideration. Policy support for an increase in the number of homes delivered at small sites in the Borough’s Strategic Area of Regeneration is another key consideration. Also of note here are policies proposed in respect of environmental health considerations, with the Local Plan including policies on: Amenity and agent of change; Noise and vibration; External lighting; Building alterations, extensions and basements; and Infill and backland sites, back gardens and amenity areas.
- 9.8.15 In conclusion, **moderate positive effects** are predicted, as per the conclusion at the Draft Plan stage. The Interim SA Report (2020) found there to be ‘considerable uncertainty’ and identified a need for “further work to understand the links between Local Plan policy choices and priority issues for local communities and groups, including groups with protected characteristics under the Equality Act.” In this respect, a key point to note is the recent A21 Development Framework, which includes a particular focus on supporting ‘active regeneration’ along the road corridor in the south of the Borough, namely to the south of the New Cross, Lewisham and Catford Opportunity Area – see Figure 9.13. This is supported, because this stretch of the road corridor is strongly associated with that part of the Strategic Area of Regeneration that falls outside of the scope of the ongoing Borough Green and Lower Sydenham vision work – see Figure 9.14. However, there are relatively few proposed allocations along this southern part of the A21 corridor (Ravensbourne Retail Park is a key site), and there remains a need to ensure a clear strategy for the wider part of the Area of Regeneration. There is also a need to consider ‘refresh’ work in respect of strategy for Catford town centre, and possibly also the New Cross Area, recognising the changing context since work was completed, in terms of the pressures and wider issues faced by local communities.

Figure 9.13: The A21 framework area

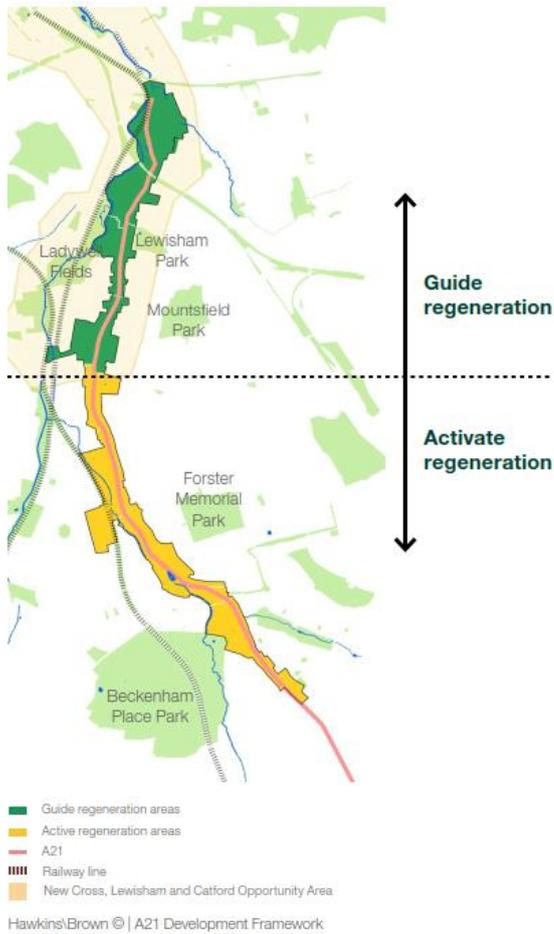
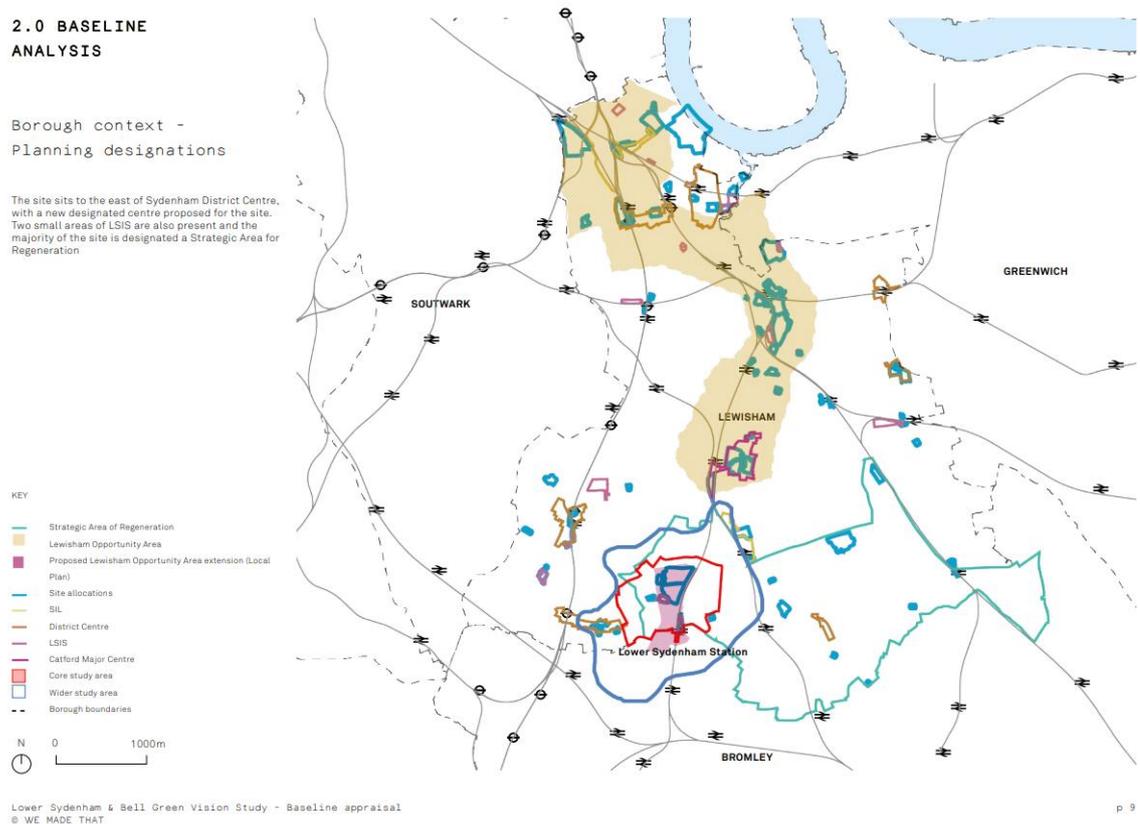


Figure 9.14: The BGLS vision area, also showing the Strategic Area of Regeneration

2.0 BASELINE ANALYSIS

Borough context -
Planning designations

The site sits to the east of Sydenham District Centre, with a new designated centre proposed for the site. Two small areas of LSIS are also present and the majority of the site is designated a Strategic Area for Regeneration



9.9 Economy

Objective: Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.

Commentary on the spatial strategy

9.9.1 Providing a wide range of new employment floorspace is important, particularly given recent and committed losses of (vacant and underused) employment land as part of plan-led (Core Strategy, 2011) regeneration in the north of the Borough. The Employment Land Study (2019) sets a target of increasing the total B-class floorspace by circa 1,000 m² per annum, after having taken into account recent and committed losses in the north of the Borough.

9.9.2 Having made these introductory points, this section goes on to consider:

- proposed mixed-use redevelopment at a number of existing employment sites;
- the proposal to deliver new employment floorspace through mixed use redevelopment schemes at town, district and local centres, most notably Lewisham and Catford; and
- the proposed new local centre at Bell Green / Lower Sydenham (BGLS).

Mixed use redevelopment of existing employment sites

9.9.3 The key headline is that there will be no net loss of employment floorspace on designated employment sites. However, in addition to 'quantitative' considerations, there is also a need to account for qualitative considerations, particularly recognising the site and space needs of industrial uses. In this light, there is a need to consider the proposed approach of A) changing the designation of three small areas within the Surrey Canal Road SIL to LSIS and, in turn, designating a compensatory new area of SIL at Bermondsey Dive-under; and B) allocating a total of ten areas of LSIS (including the three new designated areas formally designated SIL) in order to support mixed use used redevelopment, i.e. colocation of industrial and non-industrial uses, including residential. With regards to (B), there are important spatial implications, with four of the LSIS allocations in the north of the Borough, three in the west, two in the south and one in the east. The matter of supporting industrial land in the north of the Borough is potentially of particular importance, given proximity to the London CAZ, and recognising trends across London for light industrial uses to move outwards and out of London (see discussion in Section 6). There is a need to consider implications for those who rely on existing industries for employment, who might be geographically clustered and/or tend to be at risk of unemployment. This matter is explored in detail within Appendix IV.

9.9.4 Having made these introductory remarks, the Borough's sub-areas are discussed in turn below.

Central sub-area

9.9.5 There are no proposed allocations comprising SIL or LSIS here. The proposal at the Draft Plan stage was to allocate a small part of Bromley Road Sil (namely Land at Randlesdown Road and Bromley Road), reflecting the following opportunity: *"It is currently occupied by a mix of commercial uses including a car wash, car dealers and open storage facility. The existing buildings and boundary treatments are of a poorer quality and detract from local area character. Redevelopment and site intensification will provide for a more optimal use of the employment land. There is also a significant opportunity to improve the environmental quality of the site and local amenity, particularly along..."* However, this allocation has now been removed because: *"Mixed use development is not deemed suitable or deliverable on this SIL land, without compensatory SIL being provided elsewhere."*

9.9.6 Another site of note is Ravensbourne Retail Park, which does not comprise designated employment land, but which is notably adjacent to the Bromley Road SIL. The proposed strategy is notably amended, in comparison to the Draft Plan stage, with the new proposal for a mixed use residential and employment scheme, as opposed to a residential and retail / town centre uses scheme.

North sub-area

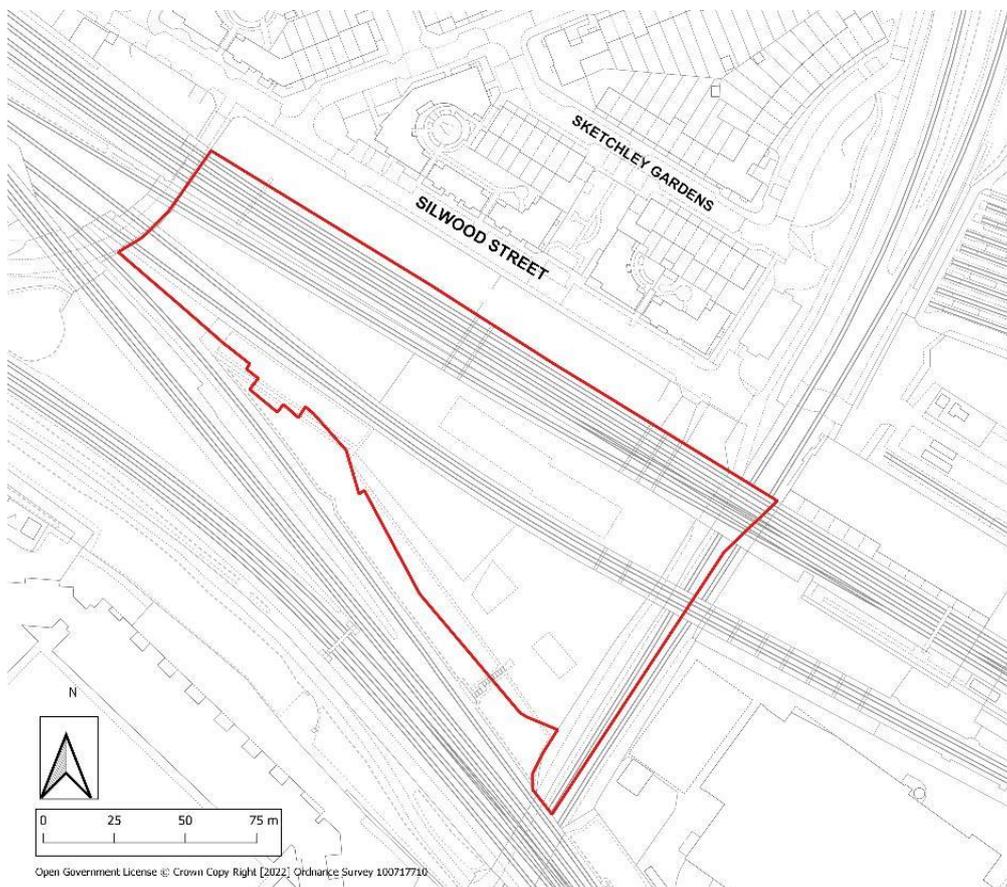
9.9.7 With regards to the three large consented schemes for land currently designated as a Mixed-Use Employment Location (MEL), namely Convoys Wharf, Surrey Canal Triangle and Deptford Landings, these sites have already been discussed above, under the 'communities (accessibility) heading. The primary consideration for discussion here is the proposed approach to industrial land.

9.9.8 With regards to current Surrey Canal Road SIL, the three proposed new areas of LSIS are as follows:

- Evelyn Court LSIS – which is at the pre-application stage, forms the north-eastern end of the Surrey Canal Road SIL, with Deptford Trading Estate located immediately to the south-east. An office block, Evelyn Court, takes up a significant part of the site, and there is an unimplemented Prior Approval for its conversion to housing. The proposal is now for more intensive redevelopment of this 0.27 ha site, compared to the Draft Plan stage, namely 102 homes (up from 38 homes) and 2,381m² employment space (up from 1,310m²).
- Surrey Canal Road and Trundleys Road LSIS – functions in isolation of the remaining SIL by virtue of a railway line that creates a physical barrier at the western edge. The site now has a resolution to approve consent which, compared to the Draft Plan, involves 45% more housing and 20% more employment.
- Apollo Business Centre LSIS – is uncommitted, with the opportunity described as follows: *“The site functions in isolation of the remaining SIL land by virtue of a railway line that creates a physical barrier along the north and western edges. It is currently occupied by a business centre. Redevelopment and site intensification, along with the co-location of commercial and other uses, will deliver high quality workspace that forms part of a new employment-led mixed-use quarter, together with the Trundleys Road SIL and Neptune Wharf MEL sites...”* The latest proposal, compared to the Draft Plan, involves 66% more housing and 66% more employment.

9.9.9 With regards to Bermondsey Dive-under, the proposed allocation aims to deliver 5,264m² of new SIL to compensate for the loss from de-designation at the three sites discussed above. The potential for a beneficial reconfiguration of the SIL, in line with the New Cross Area Framework (see Figure 5.6, above) and potentially linking with nearby Surrey Canal Triangle MEL allocation. However, there are constraints within the site, notably: *“The confined nature of the arches make them less suited to industrial uses traditionally found in SIL. However, there are opportunities for this part of the site to be developed as a [LSIS], to deliver high quality, small scale workspace for a range of industrial and commercial uses.”*

Figure 9.15: Bermondsey Dive-under (located east of Millwall FC / Surrey Canal Triangle MEL)



9.9.10 Finally, in the Deptford area:

- Lower Creekside LSIS - at Deptford now has consent for 162 homes alongside 8,200m² of employment space. The site is occupied by workshops, offices and creative industries, with the Local Plan explaining: *“Redevelopment provides the opportunity to... build on the existing Deptford Cultural Quarter as a creative hub whilst introducing new uses including residential. Redevelopment can also provide public realm and access improvements to enable an uplift in the environmental quality...”*
- Sun Wharf MEL- is the subject of a submitted application. Redevelopment provides the opportunity to build on the existing Deptford Cultural Quarter as a creative hub and taking advantage of the site's position close to Greenwich Rail and DLR station. There are also opportunities to improve the environmental quality, whilst retaining the character of the adjoining Deptford Creek Conservation Area.
- Creekside Village East, Thanet Wharf MEL - is currently vacant and is consented. Again, redevelopment provides the opportunity to build on the existing Deptford Cultural Quarter as a creative hub.

East sub-area

- 9.9.11 Blackheath Hill LSIS now benefits from a planning consent which, compared to the Draft Plan, involves roughly twice as much housing and employment in comparison to the levels anticipated by the Draft Plan. Policy states: *“Redevelopment and site intensification... can make more optimal use of the land and enable the delivery of new and improved workspace to support... viability of the LSIS.”*
- 9.9.12 The other notable allocation is Southbrook Mews, which comprises a non-designated employment site located adjacent to Burnt Ash local centre. The proposed use mix is unchanged from the Draft Plan, and policy states: *“Redevelopment and site intensification, along with the introduction of a wider range of uses, can enable the delivery of new and improved workspace to support... the local centre.”*
- 9.9.13 Also of note is Travis Perkins and Citroen Garage, which comprises part of the Manor Lane LSIS, and is currently occupied by a builders' merchants and a car dealers and associated showroom. The site was proposed for allocation in the Draft Plan, but is no longer available.

South sub-area

- 9.9.14 The proposal is to redevelop two existing LSIS at BGLS, namely at Stanton Square and Worsley Bridge Road, and, at both sites, there is support for significantly increased housing alongside BLE Phase 2. Effective re-provision of existing industrial uses could prove more challenging under a higher growth scenario; however, it is noted that the area is associated with high industrial vacancy rates.²⁴ Also, it is noted that the latest proposal for Worsley Bridge Road is for a more intensive scheme than that envisaged at the Draft Plan stage, involving 11,900m² employment, in comparison to 4,220m².

West sub-area

- 9.9.15 There are four proposed allocations of note:
- Perry Vale LSIS - is located within Forest Hill District Centre, and the new proposed approach involves a more intensive redevelopment than that envisaged at the Draft Plan stage (20% increase in housing, 136% increase in employment). Policy states: *“Comprehensive redevelopment provides the opportunity to deliver new and improved employment floorspace, along with environmental improvements, through the provision of enabling residential uses... also improve the vitality and viability of the district centre...”*
 - Clyde Vale LSIS – is located adjacent to Forest Hill District Centre, and proposals are broadly unchanged since the Draft Plan. . Proposed site specific policy states: *“Comprehensive redevelopment provides the opportunity to deliver new and improved employment floorspace, along with environmental improvements, through the provision of enabling residential uses. It will also improve the vitality and viability of the district centre and reinforce its role within the borough's town centre hierarchy... Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location...”* This is a notably small site, which could lead to challenges.

²⁴ The BLE LEIA states: *“Conversely to the trend across the rest o the Corridor and trends across London, industrial rental values have decreased in recent years in Lower Sydenham. This could be a result of the high industrial vacancy rates that have been common in the area over the last 10 years due to the large supply of industrial space in this outer London location.”*

- Willow Way LSIS - is located adjacent to Upper Sydenham/Kirkdale local centre, and proposals are unchanged from the Draft Plan stage. Policy states that.. *“redevelopment provides the opportunity to optimise the use of land with a mix of uses including the delivery of new and improved employment floorspace, alongside enabling residential uses, to complement the existing mix of uses surrounding the site and protect the amenity of residential properties facing the site.”* There is potentially more limited strategic need for redevelopment here, recognising that it is adjacent to a local centre (only); however, it is recognised that the site currently hosts a range of non-industrial uses.
- Mantle Road is a small non-designated industrial site. The site lies adjacent to Brockley Cross local centre, and development provides the opportunity to extend the parade of shops, strengthen the area’s character whilst providing active frontage to improve natural surveillance and improving access to Brockley rail station. Proposed site specific policy states: *“The operational requirements of the employment uses across the site should be taken into account. The development should also be designed so as to allow adequate amenity and access for the residential uses, without prejudicing or precluding on-site employment uses.”*

Enhancing the employment offer of town and district centres

9.9.16 Aside from targeted redevelopment of existing industrial and other employment sites, the wider employment strategy is focused on delivering new employment in town centres, alongside wide-ranging town centre focused investment and improvements. The BLE LEIA (2020) explores the potential to enhance the economy of New Cross Gate, Lewisham, Catford and BGLS, and it may be that opportunities can be more fully realised via higher growth under a BLE scenario. Focusing on Catford and BGLS, both locations are associated with low levels of employment in knowledge industries (3% for Lower Sydenham, compared to 16% for Lewisham and 32% for London), which is certainly an issue to be addressed.

9.9.17 The downside can be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *“Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase, existing sites are redeveloped, and the economy shifts to higher value employment.”* However, given that these areas are starting from a low baseline, in respect of knowledge industry jobs (see Figure 9.16), there are limited concerns. Also, concerns are allayed given Local Plan support for increased delivery of affordable workspace, with the LEIA suggesting: *“The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate.”* For Catford, the LEIA also suggests: *“extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses.”* Also of note are the following policy requirements, proposed for the Catford Shopping Centre and Catford Island proposed allocations respectively:

“Buildings should provide for a range of footprint sizes to accommodate a variety of town centre, commercial and community uses, and be designed to provide flexibility to enable sub-division of units.”

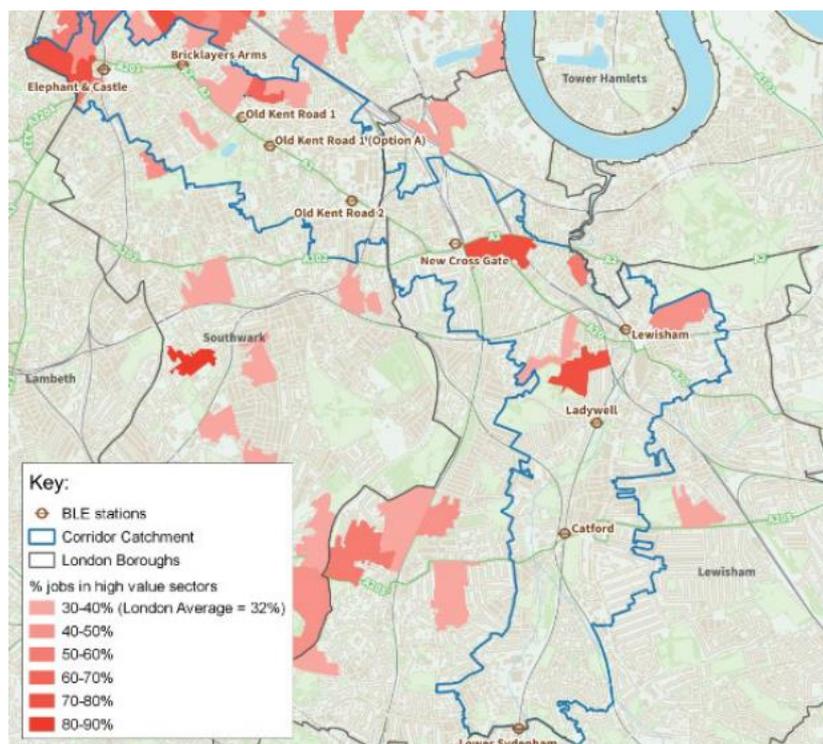
“Retail and commercial elements should reflect the site’s immediate town centre context, providing a mix of unit sizes and workspaces to support a wide range of uses and businesses.”

9.9.18 Laurence House and Civic Centre is a key allocation, in that it currently supports 18,700 m² employment floorspace. Redevelopment is set to result in a net loss of employment floorspace, but a net gain in respect of main town centre uses, and the new employment offer will be targeted so as to support a new ‘employment quarter’ within Catford town centre providing a wide mix of business units.

9.9.19 A somewhat related consideration is the Creative Enterprise Zone designated in Lewisham’s North Area, which reflects the presence of significant clusters of creative and cultural industries and institutions in the area, the positive contribution they make to Lewisham’s distinctive character, and the need to expand on their role as a catalyst for local economic and cultural development. A notable change since the Draft Plan stage is added reference to Cultural Quarters, with a new policy criterion within Policy LNA3 stating:

“To enhance existing clusters of creative and cultural industries in the CEZ, and to facilitate the creation of additional clusters, new high quality workspace and facilities will be secured through... Designating Cultural Quarters at Deptford Creekside and New Cross and carefully managing development within them, in accordance with Policy EC18 (Culture, creative industries and the night-time economy).”

Figure 9.16: Areas with a high proportion of knowledge sector jobs



A new local centre at Bell Green / Lower Sydenham (BGLS).

- 9.9.20 A key change, from the Draft Plan stage, is support for a new 'local' centre, as opposed to a 'town' centre, informed by a Retail Impact Assessment (2021). The assessment begins by explaining why it is important to give early strategic consideration to this matter, through the Local Plan, albeit there are challenges:

"The potential new town centre at Bell Green Retail Park will exceed the NPPF retail impact threshold 2,500 sq.m gross and any planning application for future development should include a comprehensive and up to date retail impact assessment. Alternatively, planning policy could specify what quantum and type of retail floorspace will be appropriate within the new town centre, removing the need for a retail impact assessment. Given that the potential new town centre is likely to be implemented in the long-term, projections are more uncertain and susceptible to change. It is difficult to establish the likely impact and implications for designated centres at this early stage. Future policy relating to a potential new town centre at Bell Green should require an up to date and thorough retail impact assessment to be provided in support of the planning application regardless of the initial findings of the impact assessment in this report."

- 9.9.21 The study does not question the Draft Plan proposal for 30,000 m² gross of town centre uses floorspace (6,000 more than currently), but proposes a breakdown of this figure between five detailed use categories (e.g. food, comparison goods, other retail). On the basis of this split, the study concludes:

*"Impact is expected to be dispersed amongst many destinations, which reflects existing trading patterns. The predicted worst case level of trade diversion and impact on all centres are expected to be offset by future population and expenditure growth. However, in the centres nearest Bell Green the level of residual comparison goods retail expenditure growth is insufficient to achieve average growth in turnover densities to a level within the range recommended by Experian. **The worst case impact figures for comparison goods retail raises concerns in relation to trade diversion from Sydenham, Forest Hill, Catford, Beckenham and Penge.** However, the best case impact assessment suggests more acceptable levels of trade diversion and impact. Nevertheless, these impact estimates are based on long term expenditure projections. The impact of a new town centre at Bell Green should be reassessed when a planning application is submitted."* [Emphasis added]

Commentary on other policies

- 9.9.22 Local Plan policies **EC1 – EC22** centre on supporting the local economy and employment in the Borough.

- 9.9.23 Policy **EC1** (A thriving and inclusive economy) frames the Borough's approach to stimulating the local economy, including through supporting sectors of local importance, delivering strategic infrastructure that can enable access to opportunities, providing residents with training and skills and delivering more affordable workspace. The policy prioritises cultural and creative industries noting that these "contribute to the diversity and distinctiveness of Lewisham's neighbourhoods and play an important role in the local economy" in particular supporting the Lewisham North Creative Enterprise Zone. Policy EC1 recognises the importance of the delivery of strategic infrastructure to create access to economic opportunities. Transport infrastructure plays an important role in economic growth and policy TR2 (Bakerloo line upgrade and extension) is recognised as fundamental for supporting significant strategic growth through "helping to unlock the development potential of strategic sites".
- 9.9.24 A number of policies focus on boosting the availability and delivery of workspace. Policy **EC2** (Protecting employment sites and delivering new workspace) sets a framework for protecting the existing hierarchy of employment land. The policy has been notably adjusted since the Draft Plan to reflect changes to the national Use Class Order, with the supporting text explaining:
- "Whilst recognising the flexibility and benefits offered by the new Class E in some parts of the Borough, particularly town centres, it is vital to plan positively for the Borough's needs for industrial capacity. The Council will therefore use planning conditions, attached to new planning permissions, to remove any applicable Permitted Development rights and restrict changes via section 55(2) of the Town and Country Planning Act 1990 (as amended). This will ensure that new commercial and industrial development is secured for this specific use and to protect the economic function of SIL, LSIS, MEL and other employment sites. The Council will also monitor development activity and consider the need to introduce Article 4 Directions to help protect the economic function and amenity of employment areas."*
- 9.9.25 Policies **EC3** (High quality employment areas and workspace), **EC4** (Low-cost and affordable workspace), **EC5** (Strategic Industrial Locations), **EC6** (Locally Significant Industrial Sites (LSIS) – formerly LEL), **EC7** (Mixed-use Employment Locations (MEL)) and **EC8** (Non-designated employment sites) all provide policy guidance on the delivery of specific types of work space.
- 9.9.26 Focusing on affordable workspace, which is workspace that is provided at rents maintained below the market rate, this is a key issue locally, with supporting text explaining: *"Lewisham's Employment Land Study (2019) and Local Economic Assessment (2019) identify the lack of low-cost and affordable workspace as a key barrier to entry in the local economy. The cost of workspace can also act as a disincentive for businesses looking to start-up or locate within the Borough, or prohibit existing businesses from expanding locally. We will therefore seek that development protects existing low-cost and affordable workspace wherever possible. Proposals including such new provision will be treated favourably."* There have been notable changes to Policy EC4 since the Draft Plan to ensure alignment with the Council's emerging Affordable Workspace Strategy, including ensuring clarity on calculating and collecting developer contributions to affordable workspace, informed by the Local Plan viability assessment.
- 9.9.27 Focusing on SIL, Policy EC5 is a new policy introduced subsequent to the Draft Plan stage. The key matter is facilitating the reconfiguration of the Surrey Canal Road SIL, including compensating for release of three areas of SIL by the designation of a new area at Bermondsey Dive-under. This is in light of the London Plan, which states: *"There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses..."* This policy approach requires further scrutiny, mindful of the following consultation response received from the GLA in 2020:
- "Further details about the compensatory re-provision of SIL at the Bermondsey Dive Under site and potential floorspace capacity - beyond the 2019 Masterplan jointly with Southwark - are also required. The site has significant physical and potential viability constraints, and without a specific Site Allocation promoting what could be delivered in terms of high-quality industrial land (rather than other employment uses such as offices), there appears to be insufficient commitment towards its realisation, which would be of concern, in particular as the scope for industrial intensification is considered to be limited."*
- 9.9.28 Focusing on LSIS, Policy EC6 has been amended to ensure a clear focus on protecting employment function: *"Development proposals within or adjacent to LSIS must not adversely impact on the function or effectiveness of the LSIS to accommodate commercial and industrial uses."* However, it is important to be clear that there is scope for mixed use redevelopment of LSIS, and this is the focus of site allocations for a total of ten LSIS (including three sites currently SIL, but proposed for LSIS designation), as discussed.

- 9.9.29 Policies **EC8** (Railway arches) is also of note as it has been amended to broaden the scope of appropriate uses to include community and cultural uses. This is notable given the proposal to allocate land at the Bermondsey Dive-Under as substitute SIL, as discussed above.
- 9.9.30 A number of policies look to support the vitality of the Borough's town centres, from supporting current town centres to opportunities to invest in potential centres. Policy **EC11** (Town centres at the heart of our communities) shapes an approach to protect the long-term viability of established town centres. Policies **EC12** (Town centre network and hierarchy) and **EC13** (Optimising the use of town centre land and floorspace) looks at steering investment towards town centres, by taking a 'town centre first' approach.
- 9.9.31 Policy **EC14** (Major and District Centres) is one of a range of policies that has been significantly amended to account for the introduction of new planning legislation. This includes changes to the Use Classes Order which has extended the scope of permitted development rights; this effectively allows greater flexibility for changes between different uses and limits the ability of the Local Plan to control the specific mix of uses within town centres, such as retail. Where the Council can exercise control (i.e. when new development proposals come forward) the policy seeks that Lewisham major centre retains a target of 50 per cent retail uses, given its role as the principal town centre in the hierarchy. This is the only town centre for which a target is set, recognising that flexibility should be provided elsewhere to support the economic recovery and town centre viability.

Assessment of the plan as a whole

- 9.9.32 It is difficult to draw an overall conclusion. On one hand there are outstanding questions regarding the proposed approach to designating new SIL to substitute for the release of SIL (to LSIS), and there is inevitably a degree of risk around the potential to effectively co-locate residential and light industrial uses through mixed use redevelopment within LSIS (and MEL). Also, at several LSIS allocations the latest proposal is for more intensive redevelopment than envisaged at the Draft Plan stage. This could feasibly lead to challenges in respect of accommodating light industrial uses, including at lower cost and affordable rents, with potential risks that some industries and businesses may need to re-locate out of the Borough.
- 9.9.33 However, on the other hand, numerous proposed allocations are set to deliver significant new employment floorspace that is well tailored to meeting the needs of growth sectors – notably the cultural, creative and digital industries – and the plan is supportive of wide-ranging enhancements to town centres as employment locations. The effect should be to support a shift to more knowledge sector jobs, from a low baseline position. A shift to more jobs in the knowledge economy can have the effect of pricing out existing businesses; however, concerns are allayed given the considerable focus on delivering new affordable workspace, and also in the knowledge that the Council can act to curate high streets and support local small businesses, in particular in Catford.
- 9.9.34 With regards to the proposed DM policies, the Local Plan includes a range of relevant policies within the section on Economy and culture. The following is considered to be a particularly important statement: *“Where the co-location of uses on LSIS... is proposed, development should be designed to ensure there is no net loss of industrial capacity [with reference to Policy EC2], and to seek net gains wherever possible. The net loss of industrial capacity will only be considered in the exceptional circumstances set out in Policies EC5.E and EC5.G. Applicants must provide evidence to suitably demonstrate that the loss is necessary owing to reasons of feasibility and the loss has been minimised as much as reasonably practical. This must include evidence of different site layout, design and development typologies considered through the design-led approach. This includes consideration of impacts on the function and amenity of employment areas and industrial uses in proximity to the site, whether within or outside the Borough, as the benefits of agglomeration of compatible uses is often integral to the viability of employment land. Furthermore, to offset the loss of industrial capacity applicants will be required to demonstrate that a wider public benefit will be achieved through the scheme. Finally, proposals will be required to provide a minimum of 50 per cent of genuinely affordable housing on the residential element, in line with the London Plan policy H4 (Delivering affordable housing).”*
- 9.9.35 In **conclusion**, on balance there is support for higher density schemes that will deliver additional employment floorspace, including low cost and affordable workspace suited to small and micro-sized businesses in industries/sectors that are strategic growth priority locally, as part of efforts to widen the economic base. Furthermore, there is clearly the potential to transform the local economy of the BGLS area, although there remains a degree of uncertainty in respect of the role of an employment hub here, in the Borough and wider context. However, there is a degree of risk associated with SIL substitution and mixed used redevelopment of existing LSIS. For this reason, **uncertain effects** are predicted.

- 9.9.36 A final important consideration relates to ideas for a green and fair economic recovery following the Covid 19 pandemic – see Box 9.1. N.B. this text mostly dates from the Interim SA Report (2020).

Box 9.1: Ideas for a green and fair economic recovery following the Covid 19 pandemic

An announcement²⁵ by the Government in 2020 explained: *“The COVID-19 outbreak has resulted in one of the largest ever shocks to the UK economy and public finances... While impacts have been widespread, they have not been equally distributed. Evidence shows the varying impacts on different groups or people with specific characteristics, including, but not limited to, BAME individuals, single parents, disabled individuals, victims of domestic abuse and low income groups, many of whom have been disproportionately affected... We will build on [work to date] to understand the key drivers of these disparities [and] tailor our interventions...”*

Similarly, a subsequent report²⁶ explained: *“There have already been more than 1 million jobs lost during the Covid-19 crisis... The impact of the labour market downturn has been highly uneven. Black, Asian and minority ethnic workers are over-represented in the sectors worst hit by the economic crisis, including hospitality, which was shut down to control the spread of the virus. Women are also nine percentage points more likely to work in a shut-down sector. The unemployment rate among 18 to 24-year-olds is predicted to reach 27% by the end of 2020, with a cohort of young people running the risk of experiencing labour market ‘scarring’ that will affect their earnings and employment for years to come. Even before the crisis, disabled people were 29 percentage points less likely to be in work than people who are not disabled, and many disabled people face new barriers in the workplace as a result of the ongoing pandemic...”*

Over 2020 and 2021 there was much discussion of the potential for a ‘green’ economic recovery following the Covid-19 pandemic and the national lockdown, with the opportunity taken to: create jobs in green growth sectors including energy efficiency, the electrification of heating, renewable power, electric vehicles, electricity transmission and storage, transport and green infrastructure; take the positives from the common experience of national lockdown; and ensure that the nation is well prepared for risks akin to a pandemic moving forward, including the direct, indirect and cumulative impacts of climate change. There have been many contributions on this subject, including from:

- The Committee on Climate Change (CCC)²⁷ - on 6th May 2020 the CCC wrote to the Prime Minister explaining that: *“As the Government considers its approach to rebuilding after the COVID-19 crisis we are writing to advise on how climate policy can play a core part. Actions towards net-zero emissions and to limit the damages from climate change will help rebuild the UK with a stronger economy and increased resilience.”* Specific priorities include:
 - Housing retrofits and building new homes that are fit for the future – *“Where the skills to deliver these measures already exist, these projects can begin now, are labour-intensive, and have direct social benefits of more comfortable homes leading to improved well-being and health.”*
 - Electricity networks – *“must be significantly strengthened across the UK to accommodate electrification of heat and transport... Post-COVID-19 economic recovery presents an opportunity for governments, regulators and the industry to work together to accelerate these investments.”*
 - Tree planting, peatland restoration and green infrastructure – *“The importance of urban greenspace to people has been highlighted... Restoring parks, urban tree planting, and supporting the green roof and sustainable drainage industries can help to bolster the UK’s slow-growing adaptation services sector.”*
 - Transport networks – as stated by the UK Transport secretary in May 2020: *“We recognise this moment for what it is: a once in a generation opportunity to deliver a lasting transformative change in how we make short journeys in our towns and cities.”*
- The Royal Town Planning Institute (RTPI) - published Plan the World we Need,²⁸ which begins with the following statement: *“To recover from Covid-19, we need to make plans. These must be holistic in nature, integrated in structure, and resourced for delivery. They need to accelerate progress to a zero carbon economy, increase resilience to risk, and create fair, healthy and prosperous communities.”*

²⁵ See <https://www.gov.uk/government/publications/our-plan-to-rebuild-the-uk-governments-covid-19-recovery-strategy/the-next-chapter-in-our-plan-to-rebuild-the-uk-governments-covid-19-recovery-strategy--2>

²⁶ See: <https://labour.org.uk/wp-content/uploads/2020/11/GER-10.11docx.pdf>

²⁷ See theccc.org.uk/publication/letter-building-a-resilient-recovery-from-the-covid-19-crisis-to-prime-minister-boris-johnson

²⁸ See rtpi.org.uk/news/plan-the-world-we-need/

The following statement from an earlier RTPI report on Priorities for Planning Reform (2020)²⁹ is also of note: *“The current situation makes it all the more important to support better planning, and avoid the risk and inefficiency of deregulation, uncoordinated investment... and uncontrolled development... The lockdown period has demonstrated the importance of high quality housing, resilient infrastructure, local services and green space, along with the inequalities that people face when accessing these. The crisis has also presented opportunities to learn from temporary improvements to air quality and biodiversity, different ways of working, and new models for cooperation on other shared challenges such as climate change.”*

- The Labour Party – amongst other things, the report on a *Green Recovery* (referenced above) focuses on retrofitting the existing building stock for energy efficiency and renewable heat/power, suggesting that *“more than 100,000 new positions could be potentially supported within the next 18 months”* if a range of policy steps are taken. The report also includes a focus on training skilled workers, explaining that: *“Skills shortages threaten the UK’s ability to transition to net zero. New technologies and the changing UK economy are shifting the demand for skills. The CBI has estimated that nine in 10 employees will need to reskill by 2030. And in the energy sector, the transition to net zero is estimated to require 260,000 new roles and a further 140,000 jobs to replace those leaving the workforce.”*

The matter of a skills gap holding back steps to achieve decarbonisation of the built environment (both through new build and retrofitting) has long been understood. The CCC report *UK Housing: Fit for the future?* (2019) explained that:³⁰ *“Developing a better-skilled construction sector will deliver better homes, high-quality jobs and ensure we realise the domestic and international industrial opportunities related to low-carbon building. Professional standards and skills across the building, heat and ventilation supply trades need to be reviewed, with a nationwide training programme to upskill the existing workforce, along with an increased focus on incentivising high ‘as-built’ performance.”* In the London context, the London Energy Transformation Initiative (LETI) *Climate Emergency Design Guide* recently concluded that *“by 2025, 100 percent of new buildings must be designed to deliver net zero carbon, and the whole construction industry will need to be equipped with the knowledge and skills necessary.”* It broke down skills gaps under the following headings: Energy Modelling, Designing, Constructing, Operating and facilities management.³¹

- The UK Climate Assembly (September 2020)³² found that 93% supported the statement: *“As lockdown eases, government... [should] encourage lifestyles to change to be more compatible with reaching net zero”*.

9.10 Historic environment, heritage, character and culture

Objective: Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham’s neighbourhoods and townscapes and support Lewisham’s thriving and evolving cultural identity.

Commentary on the spatial strategy

9.10.1 The Borough is associated with wide range historic environment sensitivities, which have been taken into account as a key factor when determining indicative development densities. This is particularly evidenced by the proposal to support lower densities at several sensitive sites, following application of a design-led process, rather than assigning an indicative density in accordance with the London Plan SHLAA standard methodology. Notably:

- At **Lewisham** several sites are assigned lower densities on the basis that they are associated with the transition between the town centre and neighbouring residential areas. Also, with regards to Lewisham Shopping Centre, the current proposal is to support a density in line with the GLA standard method, as the density figure proposed by the site promoter is considered to be too high for the local context.
- **Catford** is notably sensitive to taller buildings, but concerns in respect of indicative densities are limited recognising that they are derived from the Catford Town Centre Masterplan, which states support for: *“... well-designed and sensitively integrated higher density development that positively responds to its local context. In Catford this includes responding to the setting of listed buildings, the Culverley Green Conservation Area immediately to the south of the town centre as well as the town centre’s visibility in short, medium and longer distance views including from local parks such as...”*

²⁹ See rtpi.org.uk/policy/2020/april/priorities-for-planning-reform-in-england/

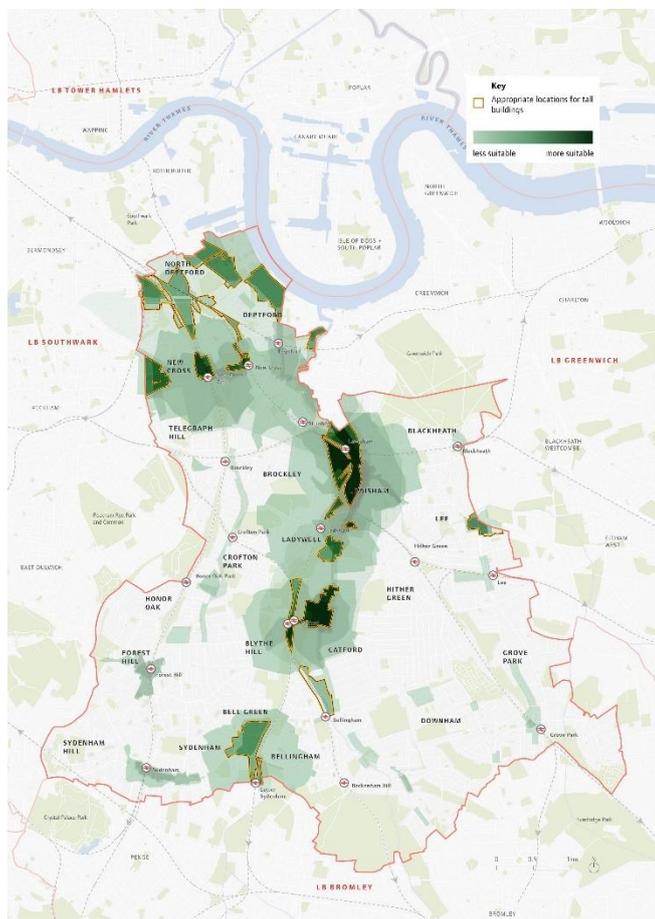
³⁰ See theccc.org.uk/publication/uk-housing-fit-for-the-future/

³¹ See letlondon.org.uk/cedg/

³² See climateassembly.org/

- 9.10.2 Maintaining a focus on Catford, it is fair to say that the proposed regeneration will be ‘heritage-led’ in several respects, including the proposal to reinstate a network of historic lanes to the north of the Broadway. The emerging Masterplan explains that: *“Post-war development in Catford has been piecemeal and has undermined Catford’s historic character and qualities. This is reflected in the redevelopment of the historic streets to the north of the Broadway in the 1970’s incorporating the Catford Centre, Milford Towers and multi-storey car park...”*
- 9.10.3 Another key area is **New Cross**, where site specific policy for the two key adjacent sites has been notably expanded since the Draft Plan stage. For example, policy now states:
- “Tall buildings... should be set back from New Cross Road and should be located more centrally in the site to minimise visual conflict with the heritage designed street frontages to the south and south east... In particular, there should be no tall buildings visible over the roofscape of New Cross Road as viewed from the junction with Lewisham Way... Means of mitigating or minimising the impact of tall buildings on the setting of Hatcham and Telegraph Hill Conservation Area and on views from within them should include consideration of silhouette, location and footprint, materiality and elevational design.”*
- 9.10.4 With regards to **BGLS**, the plan is supportive of notably higher growth under a BLE Phase 2 scenario, which inevitably leads to a degree of tension with historic environment objectives; however, the area is associated with relatively limited sensitivity. There is a need to consider the cluster of listed buildings / structures associated with Livesey Hall War Memorial, which is adjacent to the west of the gas holders site; the character of the Bellingham Estate to the east, which was influenced by ‘garden city’ principles and is associated with a homogenous form of low density housing; and locally important buildings within the Stanton Square LSIS proposed allocation, including a well-preserved art deco building.
- 9.10.5 Figure 9.17 shows final areas identified as suitable for taller buildings, following a programme of detailed investigations. As well as town centres, it is evident that tall buildings are primarily supported in locations in close proximity to a railway station. The north of the Borough is something of an exception, but the sites here are mostly already committed. It is important to note that the tall building areas are strongly focused on the proposed site allocations, as opposed to taking-in wider areas, to inform windfall planning applications. This is a key issue for the local plan.

Figure 9.17: Tall buildings suitability



9.10.6 Finally, it is important to note that an **archaeological priority area** follows the river valley through Lewisham, Catford and Bell Green, reflecting the geology of Thames and Ravensbourne terrace gravels, which supported early farming and settlement. This central corridor through the Borough is a focus of growth, which potentially leads to a degree of tension.

9.10.7 Other **notable sites** include:

- Albany Theatre (north sub-area) – the theatre is a non-designated heritage asset of historical and social significance, with Deptford Conservation Area immediately east including the Grade II listed Deptford Ramp, the oldest surviving railway structure in London. Policy states: *“Redevelopment offers the opportunity to optimise the use of the site by introducing residential uses whilst upgrading the quality of the existing community facility and securing a viable future for the Albany Theatre that will support the vitality and viability of Deptford District Centre. Redevelopment presents opportunities to enhance the local amenity, in keeping with the surrounding area and adjoining Conservation Area.”* The current proposal is for 119 homes, whilst the proposal at the Draft Plan stage was for 102 homes.
- Lower Creekside LSIS (north sub-area) is at the pre-application stage, but is nonetheless of note. Site specific policy explains that: *“Development should be informed through an understanding of the site’s historic significance, and in particular its past river related industrial activity and seek to preserve and enhance the Deptford Creek Conservation Area and the historic Crossfield Estate and its green open spaces that are integral to the design of the estate.”* A range of other more specific requirements have also been added to site specific policy, in line with the existing planning consent.
- Blackheath Hill Locally Significant Industrial Site (east sub-area) is of note as the only non-committed proposed allocation in proximity to the Maritime Greenwich World Heritage Site. Proposed site specific policy explains that: *“Development should be designed having regard to the heritage assets adjacent to the site, including the setting of the Blackheath Conservation Area, Listed and Locally Listed Buildings to the east, on Dartmouth Row.”* The current proposal is for 63 homes, whilst the proposal at the Draft Plan stage was for 30 homes, which amounts to a significant increase.
- Homebase/Argos, Bromley Road (south sub area) – site specific policy explains: *“Development should positively respond to Southend Village and heritage assets located opposite the site on Bromley Road, including the three Grade II listed buildings associated with St John the Baptist Church, and their setting.”*
- Stanton Square Locally Significant Industrial Site (south sub-area) – site specific policy explains that: *“The retention and incorporation of the well-preserved 20th Century art deco building should be considered as part of the overall design of the site. Consideration should also be given to the well-preserved set of Victorian buildings, the architectural salvage building, and the Bell pub...”*
- Beadles Garage (south sub-area) - site specific policy explains that: *“Consideration should also be given to creating an enhanced relationship between the site and the designated public open space... immediately to the north of the site whilst respecting its character and context as an historic cemetery...”*
- Featherstone Lodge, Eliot Bank (west sub-area) - Featherstone Lodge is a locally listed mid 19th Century house located at Eliot Bank and sits within gardens. Proposed policy states: *“Redevelopment of the site will provide the opportunity to provide for specialist older person’s accommodation whilst retaining the character of the area and contributing positively to the listed buildings and locally listed buildings that are located within the vicinity of the site.”*
- Catford Police Station (south sub-area) 0 is a locally listed building, and the potential for redevelopment is explored in detail through the A21 Development Framework. The proposal is to retain the main historic building fronting the A21, and redevelop land to the rear. The current proposal is for 24 homes, whilst the proposal at the Draft Plan stage was for 39 homes.
- PLACE/Ladywell (former Leisure Centre) - is adjacent to St Mary’s Conservation Area, and the latest proposal is for a more modest scheme than that envisaged at the Draft Plan stage.

9.10.8 There is also a need to consider the area specific policies, which will be drawn upon when deciding planning applications, both in respect of allocations and windfall sites. Notable changes since the Draft Plan stage include:

- LCA1 (Central Area place principles) – there is a significant new focus on Hither Green, with the proposed new designation of a local centre. Policy is largely focused on connectivity, but there the following is also a new proposed criterion: *“Enhance the character of the Local Centres through shopfront improvements, tree planting and, where appropriate, refurbishing or redeveloping buildings that detract from local character”.*

- LCA4 (A21 Corridor) and LSA4 (A21 Corridor / Bromley Road) LSA 4 A21 Corridor / Bromley Road – in both cases a new policy criterion states: *“Development proposals must demonstrate how they have responded positively to the A21 Development Framework through the design-led approach.”*
- LNA3 (Lewisham Creative Enterprise Zone) – a new policy requires designating Cultural Quarters at Deptford Creekside and New Cross, as opposed to relying solely on Policy EC18.
- LNA4 (Thames Policy Area and Deptford Creekside) – there is a new emphasis on the agent of change principle, with a view to ensuring the long term maintenance of industrial operations, including at safeguarded wharves. This follows a consultation response received from the Port of London Authority.

Commentary on other policies

9.10.9 Policy **HE1** (Lewisham’s historic environment) takes a strategic view and sets out Lewisham’s general approach. A strength of this policy is that it recognises that historic assets include landscapes, water bodies and urban spaces as well as historic buildings. The only change since the Draft Plan stage is to clarify the approach to supporting ‘enabling development’.

9.10.10 Policy **HE2** (Designated heritage assets) maps out the areas of designated assets. One key consideration is Maritime Greenwich World Heritage Site, which is located in the neighbouring Borough of Greenwich. The Local Plan recognises the significance of the buffer zone, which covers part of the plan area. New supporting text has been added, since the Draft Plan:

“UNESCO has identified the main threats to the World Heritage Site, which include development pressures within the town that could impact adversely on its urban grain and from tall buildings, in the setting, which may have the potential to impact adversely on its visual integrity. The Buffer Zone is therefore considered inappropriate for tall buildings. The London Plan states that further planning guidance will be prepared on settings and buffer zones, which will support implementation of this policy.”

9.10.11 Policy **HE3** (Non-designated heritage assets) has been subject to very limited change since the Draft Plan stage. The policy sets out the Local Plan’s stance on locally listed buildings, areas of special character and archaeological priority areas (APAs). It should be noted that the identified APAs run down the middle of the Borough and through the key growth areas, from the New Cross-Lewisham-Catford corridor down to Bellingham and Bell Green. The policy notes: *“Proposals on sites that lie within or adjacent to an APA must be accompanied by an archaeological assessment.”*

9.10.12 Another key policy to consider here is **QD4** (Building heights), which has been significantly amended since the Draft Plan stage, to ensure conformity with London Plan, which expects locations for tall buildings to be identified, with maximum heights set. A detailed study has been prepared to inform Table 7.1 within the current version of the plan, whilst the Draft Plan previously proposed a more flexible approach, recognising that there is a wide range of considerations that must be taken into account when determining an appropriate building height, which can only be fully explored at the development management stage. A risk of setting maximum heights within defined areas is that applicants will automatically seek to develop up to that maximum height. With regards to flexibility, the supporting text emphasises that: *“Development proposals for building heights that depart from the parameters set by the Local Plan will be considered having regard to relevant material considerations. In such circumstances a wider public benefit must be demonstrated to justify the design of the development.”*

9.10.13 Policy **HO8** (Housing with shared facilities (Houses in Multiple Occupation)) is also of note. Proposed policy criteria seek to avoid an overconcentration of HMOs in any given area, explaining: *“This will be assessed where the character of the area has changed or local amenity has been adversely impacted as a result of: Visual amenity... noise... traffic generation... waste management... pressure on community facilities...”* The supporting text goes on to explain:

“The latest 2022 review concludes that there has been a significant increase in HMOs in Lewisham since 2018, with an overconcentration of HMOs evident across the Borough in wards with either a low, medium or high presence of HMOs traditionally. Furthermore, there is evidence to suggest this has resulted in adverse impacts on local amenity. The Council is therefore considering extending the Article 4 Direction area. Development proposals for new small HMOs in areas covered by an Article 4 Direction will be considered against Part (B) of the policy.”

- 9.10.14 There are also a number of policies within the 'Economy and Culture' section which seek to support Lewisham's thriving and evolving cultural offer. In particular: Policy **EC18** (Culture and the night-time economy) identifies the Borough's three cultural quarters, Deptford Creekside, New Cross and Forest Hill, which are important for "*cultural, community and commercial activities*", and notes that proposals with these activities in mind should be prioritised in the cultural quarters; Policy **EC19** (Public houses) acknowledges the important cultural and social value of public houses, setting out the need to protect these social assets, with the policy having been notably supplemented since the Draft Plan stage; and Policy **EC20** (Markets) recognises the cultural significance and vibrancy markets bring to the Borough, with a commitment to protect current market space and support new market space in "appropriate town centre locations." The Local Plan not only notes the current role markets play as community hubs but also wide ranging historic associations.
- 9.10.15 A final policy of note is Policy **SD9** (Lewisham's waterways), which has been notably amended in response to comments received from the Port of London Authority. The supporting text explains: "*The Council recognises and supports community aspirations for the Lenox Project. This involves the restoration of the Lenox, a state-of-the-art naval ship that was built in 1678 in Deptford and was the first of Charles II's thirty ships. The project has significant potential for heritage-led regeneration in the Borough, and can help to promote the visitor economy as well as understanding of Lewisham's historical and cultural development. Any such alternative uses proposed at the safeguarded wharf must robustly justify why the site is no longer viable or capable of being made viable for waterborne freight.*"

Assessment of the plan as a whole

- 9.10.16 The spatial strategy reflects a carefully targeted approach to assigning indicative development densities to sites, with density assigned via a design-led approach (building on initial outcomes of the London Plan SHLAA standard methodology) at a selection of sensitive sites. At Lewisham several sites are assigned lower densities on the basis that they are associated with the transition between the town centre and neighbouring residential areas. At BGLS there is a need to consider the cluster of listed buildings / structures to adjacent to the west of the gas holders, the heritage value of the gas holders themselves, the distinctive townscape and character of the Bellingham Estate to the east (which was influenced by 'garden city' principles and is associated with a homogenous form of low density housing) and locally important buildings within the Stanton Square LSIS proposed allocation, including a well-preserved art deco building. These assets could come under pressure under a BLE Phase 2 / higher growth scenario; however, there will be good potential to avoid and mitigate impacts through masterplanning and design.
- 9.10.17 With regards to DM policies, the Local Plan includes a section on Heritage, with policies covering: Lewisham's historic environment; Designated heritage assets; and Non-designated heritage assets. The following is a key statement: "*Proposals affecting heritage assets should be of the highest architectural and urban design quality, having regard to and respecting local character and complying with other policies in this plan. Heritage should be considered as an integral component of sustainable neighbourhoods and communities and must meaningfully inform the design of development. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported, subject to meeting other policy requirements.*"
- 9.10.18 It is also important to note the importance of site specific policy. Taking one example, site specific policy for Lower Creekside LSIS (albeit now consented), which states: "*Development should be informed through an understanding of the site's historic significance, and in particular it's past river related industrial activity and seek to preserve and enhance the Deptford Creek Conservation Area and the historic Crossfield Estate and its green open spaces that are integral to the design of the estate.*" There is confidence that allocations / indicative densities are proposed with a good understanding of the potential to avoid and mitigate historic environment impacts through design etc. However, there remains the need for further work, and there will be a need to take account representations received through the current consultation.
- 9.10.19 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.11 Land and natural resources

Objective: Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.

Commentary on the spatial strategy

- 9.11.1 The spatial strategy leads to limited implications, noting that the great majority of proposed allocations are brownfield. The Interim ISA Report (2020) discussed two sites that include an element of greenfield land, although one of those has now been removed from the plan following comments received through consultation.³³ The remaining site is Featherstone Lodge, Eliot Bank, which is now consented. It is a locally listed mid-19th Century house that sits within mature gardens. Redevelopment of the site will provide the opportunity to provide for specialist older person's accommodation whilst contributing positively to the listed buildings and locally listed buildings that are located within the vicinity of the site.
- 9.11.2 Another consideration here relates to the proposal to reroute the South Circular at Catford. This is explored in detail in Appendix IV, which concludes broad support, as it is difficult to envisage effective town centre regeneration without the realignment. However, realignment will result in the loss of the northernmost part of the St. Dunstan's College Jubilee Grounds **Metropolitan Open Land (MOL)**, which is widely valued as providing a green setting to Catford town centre, although it is used only by the school and is not publicly accessible. The MOL Review (2020) concludes a need to 'conserve and enhance' the MOL, finding that, whilst it performs quite poorly in terms of certain MOL criteria, it performs well in terms of 'contributing to the physical structure of London by being clearly distinguishable from the built-up area'. A mitigating factor is that a significant proportion of the MOL that would be lost is the current northeast corner that is already segregated from the main part of the MOL by a small access road (see image in Appendix IV); however, there is no avoiding the conclusion that an area of MOL will be lost that is not insignificant.
- 9.11.3 A final consideration relates to minimising waste, ensuring good waste management and supporting a more circular economy, e.g. with construction waste re-used on-site; however, again it is not possible to infer implications from the spatial strategy. It is noted, however, that the proposal is to safeguard all three existing waste sites within the Borough, namely: the South East London Combined Heat and Power (SELCHP) energy recovery facility, New Cross; Recycling Centre (HTL Waste Management Services), New Cross; and Reuse & Recycling Centre (London Borough of Lewisham), New Cross.

Commentary on other policies

- 9.11.4 From the outset the Local Plan notes that higher density and mixed-use development will form an integral part of using land more efficiently. Policies **QD3** (Building heights) and **QD6** (Optimising site capacity) are a demonstration of this. Policy QD3 has been significantly reviewed since the Draft Plan stage, such that there is a greater element of spatial specificity / prescriptiveness, as has been discussed above, in Section 9.10. With regards to Policy QD6, the policy requires *"the design-led approach to make the best use of land and optimise the capacity of a site, with reference to Policy QD1 (Delivering high quality design in Lewisham)."* Although the policy wording is quick to note that optimum density does not mean maximum density it is acknowledged higher density developments will be needed in order to meet housing needs. Indeed, Policy QD6 is supported by policy **HO1** (Meeting Lewisham's housing needs) which requires that: *"Development proposals must make the best use of land and optimise the capacity of housing sites."*
- 9.11.5 Other policies of note here include:
- Policy **SD1** (Responding to the climate emergency) sets out that proposals must: *"Help London to achieve waste net self-sufficiency by applying the waste hierarchy and circular economy principles."*
 - the council's responsibility to "help London to achieve net waste self sufficiency by promoting the circular economy in order to increase the re-use and recycling of materials and achieve reductions in waste going for disposal." This is an important acknowledgement that the Council have an advocacy and enforcement role it play in minimising the Borough's waste.

³³Havelock House, Telecom Site and Willow Tree House, near Horniman Drive has now been removed from the plan. It is a greenfield site with a "mature landscape setting", where the proposal was for a lower density scheme, in line with site specific policy stating: *"A tree survey should identify healthy, mature trees to be retained within the backland plot. Development should... create a public realm space to evoke the feeling of a village green."*

- Policy **SD11** (Ground conditions) – requires that proposals “*demonstrate that any risks associated with land contamination, including to human health, public safety and the environment will be adequately addressed in order to make the development safe*”. This is one of many ‘environmental’ focused policies that will need to be considered alongside Policy QD6 (Optimising site capacity).
- Policies **SD12** (Reducing and sustainably managing waste) – includes policy criteria for dealing with proposals for new waste management facilities. The criteria have been notably supplemented since the Draft Plan stage, including a new emphasis on taking into account the ‘proximity principle’ and supporting infrastructure. The following requirement is also notably retained from the Draft Plan stage: “*They achieve a positive carbon outcome or demonstrate that steps are in place to meet the minimum greenhouse gas performance target, in line with draft London Plan Policy S18 (Waste capacity and net waste self sufficiency)*”
- Policy **SD13** (Design to support the circular economy) – includes policy criteria aimed at ensuring that waste management is taken into account when designing new buildings. The following criterion is amended, since the Draft Plan stage, with a view to ensuring suitably flexibility: “*All proposals for new multi-storey development, including flatted residential development, must also make provision for sensitively designed storage and collection systems at each floor unless it is suitably demonstrated that other designs can appropriately service the development. Proposals should avoid the use of forecourts or ground floor internal waste storage where this may adversely impact on the amenity of the building’s occupiers and surrounding properties.*”

Assessment of the plan as a whole

- 9.11.6 The spatial strategy leads to limited implications. All proposed allocations are brownfield, other than one proposed ‘backland’ site, and there is no reason to suggest that the proposed approach to growth will lead to challenges in respect of sustainable waste management.
- 9.11.7 With regards to DM policy, there is a particular need to set out the Council’s expectations in respect of waste management and supporting a circular economy, recognising that there are always significant steps that can be taken, over-and-above the status quo, but that these can be associated with a cost to the developer / planning applicant. Current policy allows for flexibility, and so there will be the potential to explore further policy specificity ahead of plan finalisation.
- 9.11.8 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty.

9.12 Transport

Objective: Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.

Commentary on the spatial strategy

- 9.12.1 Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the A21 corridor, supporting the aspirations of the New Cross Area framework, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed under ‘air quality’, a key matter is matching development densities to PTAL, and on this basis there is support for the proposed strategy. With regards to BGLS, as discussed under ‘air quality’ and ‘accessibility’, there is cautious support for higher growth under a BLE Phase 2 scenario, from a transport perspective, although there remains much uncertainty ahead of masterplanning work.
- 9.12.2 Another point to note is that site specific policy has been notably supplemented, since the Draft Plan stage, with added requirements in respect of walking and cycling links, including to reflect consultation responses received from local interest groups. By way of an example, site specific policy for Lewisham Retail Park (albeit now consented) has been supplemented to require: “*Development should improve opportunities for walking, cycling and other active travel modes, contributing to the Healthy Streets Corridor between Lewisham and Deptford. Development should not result in a reduction in existing footway, cycle lane or carriageway space along Jerrard Street and Thurston Road.*”

Commentary on other policies

9.12.3 Taking each of the transport policies in turn, all are clearly supported, from a transport perspective:

- Policy **TR1** (Sustainable transport and movement) begins with the following statement, which has been strengthened since the Draft Plan stage (from a transport perspective): *“The integration of land use and transport, along with an effective public transport network, are essential to delivering inclusive, safe, healthy, liveable, walkable and sustainable neighbourhoods in Lewisham. Development proposals must make the most effective use of land and optimise the capacity of sites by taking into account connectivity and access to existing and planned future public transport. Priority should be given to reducing car use and both promoting and enabling movement by walking, cycling and the use of public transport.”* The policy also notably lists supported major transport infrastructure projects, and it is noted that reference to New Cross to Lewisham Overground extension has been removed, at the request of GLA/ TFL.
- Policy **TR2** (Bakerloo line upgrade and extension) has been notably strengthened with a view to supporting the BLE, stating: *“Development proposals on sites located within 400 metres of a proposed Bakerloo line station or safeguarded area must demonstrate that development will not preclude or delay the delivery of the BLE, will not lead to excessive cost in the delivery, and must be compatible with the BLE (for example, in relation to vibration from the tunnels), both during construction and in operation. Foundation and basement design will be particularly critical for over tunnel alignments, ground level needs at stations and for other work sites. Development proposals must also be designed to optimise the accessibility provided by the introduction of the BLE into the local area. This may include provision for new or improved public realm and transport infrastructure enhancements.”*
- Policy **TR3** (Healthy streets as part of healthy neighbourhoods) has been supplemented with view to being more proactive and positive in respect of encouraging modal shift, e.g. with reference to ‘enabling’ rather than just ‘encouraging’ (in line with London Plan). One of the challenges is to balance, on the one hand, a desire for all streets to be designed in accordance with healthy streets principles with, on the other hand, a need to target efforts on key corridors where significant growth is planned and where development can deliver improvements directly on site and nearby.
- Policy **TR4** (Parking) has been notable amended, since the Draft Plan stage. The following is a centrally important requirement:

“In line with the London Plan, car-free development should be the starting point for all development proposals in places that are, or are planned to be well-connected by public transport with developments elsewhere designed to be car-lite.”
- Policy **TR5** (Deliveries, servicing and construction) has been helpfully supplemented with a new criterion on shared facilities, to aid efficient deliveries etc: *“Development proposals, particularly those including commercial uses, are encouraged to optimise the use of land by making provision for shared storage, micro-consolidation and distribution facilities appropriate to use(s), scale and location of development.”* The policy has also been amended in response to a consultation response received from the Port of London Authority: *“Consideration may also be given to the potential use of existing or proposed piers and structures to support small scale, last-mile distribution.”*
- Policy **TR6** (Taxis and private hire vehicles) seeks to ensure that any development proposals that encourage taxi and private hire use will not impede or create barriers towards achieving modal shift towards walking, cycling and public transport; whilst also recognising that taxis are a popular and “safe and regulated” form of transport, particularly important for some groups, including *“people with reduced mobility who require accessible door-to-door transport services”*.
- Policy **TR7** (Digital and communications infrastructure and connectivity) has been supplemented to ensure a focus on barriers to connectivity over-and-above access to the infrastructure itself. This is supported, from a transport perspective, given the importance of supporting home / blended working.

9.12.4 Other policies of note, and broadly supported, include:

- Policies **QD1** (Delivering high quality design in Lewisham) and **QD3** (Public realm and connecting places), which encourage high quality public realm design that incorporates connectivity and accessibility into design principles, to encourage the modal shift. As explained in QD3: *“In addressing the public realm, development proposals should prioritise the movement of people by walking, cycling and the use of public transport, in line with the Healthy Streets Approach. This policy should therefore be read in conjunction with Policy TR3 (Healthy streets as part of healthy neighbourhoods).”*

- Policy **SD9** (Lewisham’s waterways) has been notably amended in response to comments received from the Port of London Authority. The supporting text now explains: *“Development proposals at Convoys Wharf should support and enable appropriate waterborne and riverside uses, consistent with the safeguarding Direction, London Plan policy S15 (Water transport) and extant planning consents.”* The policy notably goes on to discuss the Lenox Project, which is associated with a safeguarded wharf.
- Policies **GR1** (Green infrastructure and Lewisham’s Green Grid) and **GR2** (Open space) have been the subject of major revisions, with a new focus on designating a hierarchy of open spaces, informed by the findings of an Open Space Review (2022). The lowest tier designation is Neighbourhood Open Space, the primary function of which is: *“Provision for children and young people, informal amenity space and civic and market squares and hard-surfaced areas designed for pedestrians.”*

9.12.5 Finally, it is important to note that the numerous area-specific policies have been significantly consolidated to avoid repetition of text, including in respect of supporting a Healthy Streets approach, in the knowledge that Healthy Streets are the focus of borough-wide Policy TR3. Similarly, several area specific policies in respect of the Lewisham Links have been removed, since the Draft Plan stage, to avoid repetition of text, given borough-wide Policy GR4 (Lewisham Links).

Assessment of the plan as a whole

- 9.12.6 Key transport related considerations have already been discussed above, including in respect of directing growth to the most accessible locations, increasing permeability of the urban realm, improving links between neighbourhoods and key destinations including open spaces, enhancing the Waterlink Way and supporting new and upgraded transport infrastructure, most notably the BLE and the A205 realignment at Catford. As discussed above under ‘air quality’, a matter of potential overriding importance is matching development densities to PTAL, and in this respect the proposed spatial strategy is supported. With regards to BGLS, as discussed under ‘air quality’ and ‘accessibility’, there is cautious support for the Local Plan’s commitment to follow a more ambitious, higher density growth strategy under a BLE Phase 2 scenario. All of these factors serve to suggest the likelihood of significant positive effects, although there remains a degree of uncertainty at this stage in the plan-making process, with the potential for more detailed work to understand how the spatial strategy might best serve to respond to existing transport issues/opportunities and also the extent to which transport impacts can be mitigated.
- 9.12.7 With regards to the proposed development management policies, the Local Plan includes a section dedicated to Transport with policies on: Sustainable transport and movement; Bakerloo line upgrade and extension; Healthy streets as part of healthy neighbourhoods; Parking; Deliveries, servicing and construction; Taxis and private hire vehicles; and Digital and communications infrastructure and connectivity. The policies are notably cross-cutting; for example supporting text explains that: *“High quality public realm underpins the integrated approach to land use and transport... Development proposals will be expected to consider public realm at the early stage of the design-led process, having regard to Policies QD3 (Public realm and connecting places) and TR3 (Healthy streets as part of healthy neighbourhoods).”*
- 9.12.8 In conclusion, **moderate positive effects** are predicted, although there is considerable uncertainty. The following recommendation from the Interim IIA Report (2020) continues to hold true: *“Moving forward, there should ideally be a re-examination of spatial growth scenarios / reasonable spatial strategy alternatives on the basis of a firm assumption regarding BLE delivery, in order to ensure that the Local Plan spatial strategy responds most appropriately to future PTAL and directs growth so as to realise opportunities in respect of increasing accessibility and delivering transport infrastructure upgrades.”* It is somewhat unfortunate that there remains uncertainty regarding the BLE, because were there certainty it would be possible to undertake additional detailed work to ensure that the local plan responds as proactively as possible to the opportunities that will arise, including from a transport perspective.

9.13 Overall conclusions on the Local Plan

- 9.13.1 The aim of this section is to: draw overall conclusions on the Local Plan; and present a stand-alone discussion of 'cumulative effects';

Overall conclusion

- 9.13.2 The assessment predicts positive effects in respect of the majority of objectives, with 'significant' positive effects predicted in respect of **Accessibility**. This 'significant' positive effect is predicted primarily on the basis that the proposed spatial strategy focuses growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration. This characteristic of the proposed spatial strategy also enables a conclusion of 'moderate' positive effects in respect of **Air quality and Transport**.
- 9.13.3 Another key 'accessibility' consideration is in respect of the use mix supported at specific sites and, in this respect, it is important to note that a range of changes have been made since the Draft Plan stage. However, at some sites the proposed use mix is unchanged, e.g. Lewisham Shopping Centre, which is comfortably the largest uncommitted site (e.g. set to deliver over 60,000 m² of town centre uses, with the next most significant delivery at Convoys Wharf MEL, at 50,400m²), albeit the site is at the 'pre application' stage. Delivering town centre and employment uses at this key site, in addition to residential, is important from a perspective of supporting the aspiration for Lewisham to attain London Metropolitan Centre status.
- 9.13.4 The other topics for which 'moderate' positive effects are predicted are: **Biodiversity and green infrastructure** (although certain tensions are highlighted, noting the focus of growth along the sensitive river corridors, including the A21 corridor); **Climate change mitigation** (although there is a need for further work to ensure that the spatial strategy makes the most of locational opportunities, particularly in respect of heat networks); **Housing** (because the approach to site selection, densities, use mix and small sites will enable all key targets to be met, including the London Plan ten year target, plus there is support for significantly higher densities at Bell Green and Lower Sydenham under a BLE Phase 2 scenario); **Wider communities issues** (although there are certain tensions, and a need for further work to ensure that existing communities and businesses share in the benefits of growth, particularly in the Strategic Area of Regeneration in the south of the Borough, and particularly that part distant from the A21 corridor); and **Historic environment and townscape** (with the assessment serving to demonstrate that understanding of constraints and opportunities has fed-in to the calculation of indicative densities, and site specific policies having been notably supplemented since the Draft Plan stage in light of consultation responses).
- 9.13.5 In terms of the **Economy**, the conclusion is 'uncertain' effects, which is a departure from the Draft Plan stage. There is a clear strategy aimed at supporting growth in target sectors; however, there are certain tensions, particularly around mixed use redevelopment of existing industrial sites, with ten LSIS (including three currently designated as SIL, where the proposal is to change the designation to LSIS) proposed for mixed use redevelopment, and densities at several having been increased since the Draft Plan stage.
- 9.13.6 The only conclusion of overall negative effects is reached in respect of **Climate change adaptation** on the basis that a significant number of proposed allocations intersect the flood risk zone. This results from the proposal to focus growth along strategic transport corridors that follow river valleys, and the proposal to intensify uses at numerous sites that have historically been used for uses that are less vulnerable to flooding, in particular industrial and retail uses. The proposed strategy is reflective of an understanding that there are steps that can be taken to satisfactorily mitigate flood risk, including through: drainage systems, urban greening (linking with wider climate change adaptation objectives, around minimising the urban heat island effect and ensuring shading for buildings and public spaces); avoiding vulnerable uses on the ground floor, flood resistant design (e.g. to prevent water from entering the building and damaging its fabric) and flood resilient design (e.g. to ensure the building's structural integrity is maintained and that drying and cleaning can be facilitated). The proposed strategy and site-specific policy will warrant further scrutiny as part of plan finalisation, mindful of the risk of in-combination impacts. Planning Practice Guidance on flood risk has been notably updated recently (August 2022) including in respect of downstream in combination impacts, for example stating: *"Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials."*

- 9.13.7 Finally, it is important to note that the assessment presented above has included a focus on changes made since the Draft Plan stage, and these changes serve to highlight the challenges in respect of plan-making and assessment, with numerous changes made following reconsideration of appropriate density / use mix, and numerous changes made to reflect recent planning consents. In turn, this serves to highlight that many of the issues and impacts associated with this plan are very ‘fine grained’ and, in turn, numerous. Issues and impacts are associated with site selection only to a limited extent. More significant are issues / impacts associated with inter-related considerations in respect of density, use mix and design / development management. In turn, it is inherently challenging for this report explore all issues and impacts in detail. Rather, the aim is to highlight issues and headline impacts / tensions, with a view to supporting ongoing scrutiny and discussion. For example, a key issue for the local plan is in respect of tall buildings policy to inform planning applications for schemes other than those envisaged through the package of site allocations, but it is difficult to draw conclusions regarding ‘on the ground’ impact.
- 9.13.8 The Council should take these assessment findings into account as part of plan finalisation, as efforts are made to balance competing objectives, for example, on the one hand, socio-economic objectives relating to meeting (and exceeding) the London Plan housing target and meeting employment growth/diversification and town/district centre regeneration objectives, and, on the other hand, minimising tensions with environmental objectives. Whilst there can be ‘win-win’ opportunities, including in respect of climate change mitigation (heat networks), biodiversity / green infrastructure (e.g. river deculverting) and, in some cases, heritage, there are other environmental objectives for which growth leads to an inherent tension, perhaps most notably flood risk. It will also be important to recall that there can be tensions between competing socio-economic objectives, including objectives relating to changing / ‘balancing’ local economies on the one hand, whilst meeting the needs of existing communities, including more vulnerable communities and groups within the population, on the other hand. However, tensions of this nature can often be resolved through careful plan-making, e.g. stringent DM policy and masterplans for key areas of change. In respect of DM policy, it will be important to ensure that the stringency of policy aligns with the inherent locational constraints at proposed allocations (e.g. flood risk), and that DM policy feeds into final decisions on indicative densities. In respect of masterplans, the Council has undertaken a range of good work, including for Catford and the A21 corridor, and there will be merit to keeping work up to date, mindful of the national context including in respect of post Covid and cost of living.

Cumulative effects

- 9.13.9 The regulations underpinning IIA indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. This essentially amounts to a requirement to ‘cast the net wide’ (geographically and temporally) in respect of aspects of the future baseline situation that are taken into account.
- 9.13.10 Cumulative effects have not been omitted from / have naturally fed in to the discussion above, but the following is a concise summary of some key considerations:
- BLE – the plan is strongly supportive of the BLE, which would deliver benefits not only to LB Lewisham but also to LB Southwark to the west, whilst BLE Phase 2 would likely extend into LB Bromley to the south. Benefits would also be felt more widely, with the BLE Local Economic Impact Assessment (2020) finding that: *“Opportunity Areas on the whole extended and upgraded Bakerloo line between Harrow and Hayes have capacity for over 100,000 new homes and 130,000 new jobs alongside significant wider benefits including improved accessibility, reduced congestion...”*
 - BGLS – the plan is supportive of transformative growth in this area regardless of BLE Phase 2, but is clear that there will be an opportunity to follow a notably more ambitious higher growth strategy should BLE Phase 2 become funded. Under a higher growth scenario there would certainly be a need to work closely with LB Bromley, noting that Lower Sydenham Station is currently on the Borough boundary. Land in LB Bromley in the vicinity of Lower Sydenham Station is dominated by a large LSIS, which itself links quite closely to the Crystal Palace Renewal Area to the west.
 - Green and blue Infrastructure - linked to the above, there is an opportunity to work in collaboration with LB Bromley (in particular, given the BGLS strategic growth opportunity) and LB Greenwich in respect of realising the opportunity to enhance the South East London Green Chain to Regional Park status, which is a strategic opportunity set out within the All London Green Grid Supplementary Planning Guidance.
 - Industrial land – this is a key ‘larger than local’ consideration, which is a focus of the assessment presented above, e.g. see the chart showing decline of industrial land across London in Section 6.

Part 3: What are the next steps?

10 Plan finalisation

- 10.1.1 This IIA Report is published alongside the proposed submission version of the Lewisham Local Plan. Once the period for representations has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the Local Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the consultation. The IIA Report will also be submitted.
- 10.1.2 At Examination the Inspector will consider representations (alongside the IIA Report) before then identifying what modifications for soundness. Modifications these will be prepared and then subjected to consultation, alongside IIA if necessary.
- 10.1.3 Once found to be 'sound' the Local Plan will be formally adopted by the Council. At the time of adoption a 'Statement' must be published that explains the 'story' of plan-making / IIA and sets out 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 The IIA Report must present 'measures envisaged concerning monitoring'.
- 11.1.2 At the current time, in-light of the assessment findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Loss of light industrial land, potentially with a focus on the needs of specific types of business;
 - Development in a flood risk zone, and also potentially adjacent to the flood risk zone given uncertainty regarding future flood risk given climate change; and
 - Impacts to existing communities / groups within the population as a result of town and district centre regeneration and the redevelopment of existing industrial and mixed use employment sites.

Appendix I: Regulatory requirements

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the IIA Report (N.B. this current report is not the IIA Report, but aims to present the information required of the IIA Report nonetheless); however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this IIA Report, in-line with an interpretation of regulatory requirements

		QUESTIONS ANSWERED	AS PER REGULATIONS... THE IIA REPORT MUST INCLUDE...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
		What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the IIA scope?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1		What has plan-making / IIA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2		What are the IIA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3		What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Table B: Questions answered by this IIA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

i.e. answer – *What's the scope of the SA?*

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the IIA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report, which was updated post consultation and is now available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	Table C presents a discussion of more precisely how the information within this report reflects the IIA Report requirements (N.B. to reiterate this report is not the IIA Report).
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	The outcome of scoping was an 'IIA framework', and this is presented – in an updated form - within Section 3 ('What's the scope of the SA'). Messages highlighted through context and baseline review are also presented within Appendix III.
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'IIA framework'. The IIA framework is presented within Section 3. Also, messages from context review are presented within Appendix III. With regards to explaining "how... considerations have been taken into account", Section 7 explains the Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the 'stand-out' plan issue and hence that which should be the focus of alternatives appraisal/ consultation), whilst Section 9 presents an appraisal of the Draft Plan. All appraisal work naturally involved giving consideration to the IIA scope, and the need to consider the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations are made as part of the draft plan appraisal presented in Section 9.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on certain issues / options. Also, Section 7 explains the Council's 'reasons for selecting the preferred option'. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Section 11 presents measures envisaged concerning monitoring.

Regulatory requirement	Information presented in this report
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The IIA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim IIA Report is published alongside the Draft Plan, in order to inform the current consultation and next steps.
The IIA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim IIA Report will be taken into account when preparing the Proposed Submission Plan, alongside consultation responses received on the Draft Plan and this Interim IIA Report.

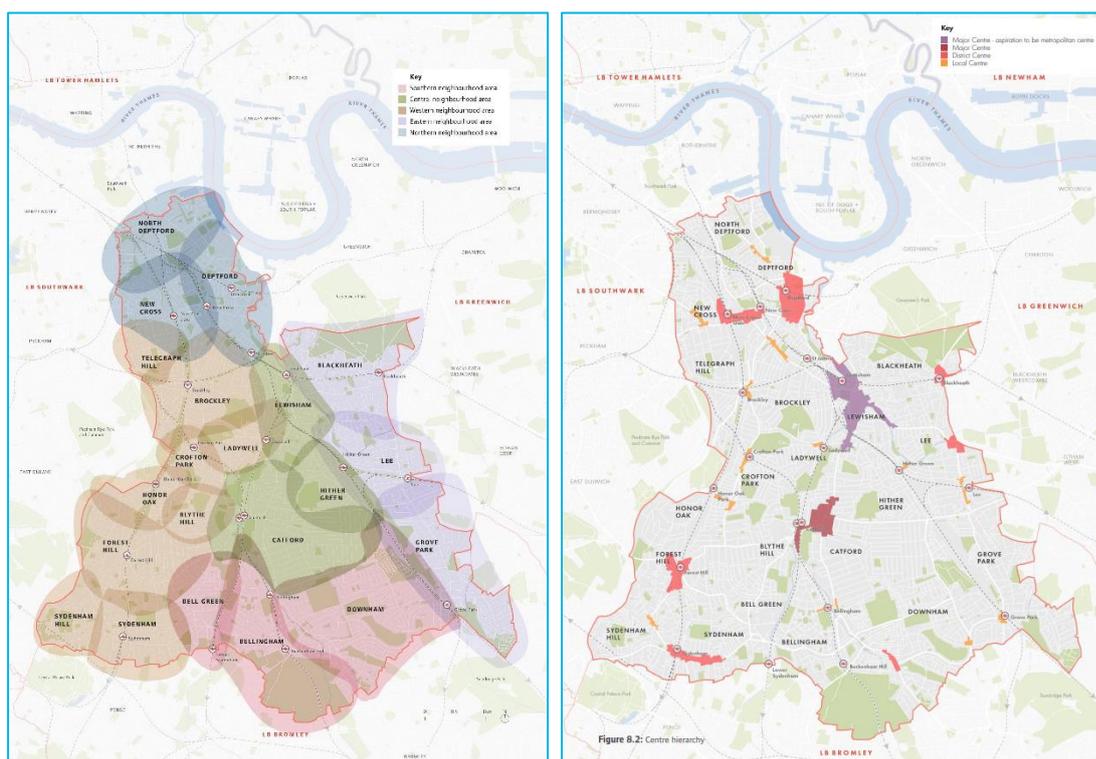
Appendix II: The SA scope

Introduction

As discussed within Section 3, whilst a Scoping Report was published for consultation in 2015, in 2019 the decision was taken to revisit the IIA scope to reflect significant changes to policy context and understanding of key issues locally since the time of the scoping consultation. At the current time comments are welcomed on the IIA scope and any comments received will be taken into account as part of future IIA work, i.e. work subsequent to this consultation / ahead of the Regulation 19 publication stage.

The aim of this appendix is to introduce the IIA scope.

Maps of sub-areas and major / district / local centres in the Borough



Air quality and pollution

Air quality is a significant public health issue in Lewisham and across London. The link between air quality and public health outcomes is well documented. Air pollution is estimated to reduce life expectancy of every person in the UK by an average of 7 to 8 months and in Lewisham, the proportion of all-cause adult mortality attributable to air pollution is 6.5 per cent, which is higher than the national average.

The London Mayor has committed to making air quality in London the best of any major world city. There is also a need to give effect to the NPPF which sets out that local plans should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs).

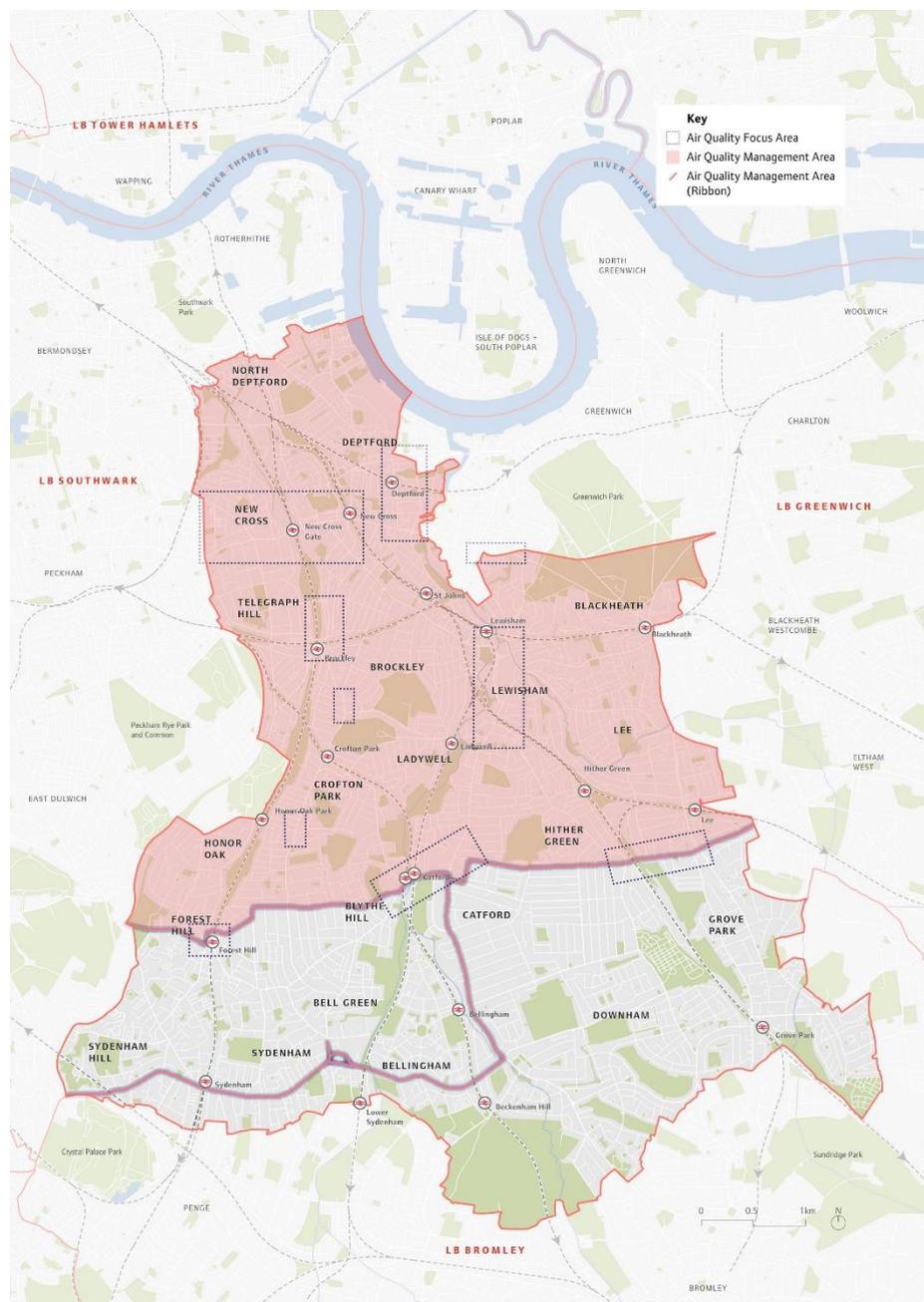
There are currently 6 AQMAs in Lewisham. These cover all the areas north of the A205 (South Circular) together with major roads in the south. The AQMAs have been declared for several pollutants. Monitoring indicates that the Borough is exceeding the EU annual average limit for Nitrogen Dioxide at some locations.

In addition to AQMAs there are also 10 Air Quality Focus Areas (AQFAs) in the Borough; these areas are locations that have been identified as having high levels of pollution and human exposure. Furthermore, whilst the Borough is meeting the EU Limits for Particulate Matter (PM10) it is exceeding the World Health Organisation air quality guideline annual average for this pollutant.

The primary source of air pollution is road traffic, and hence it follows that there is a need for the Local Plan to minimise the need to travel and support a modal shift away from the private car and towards active and public transport.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Minimise air, noise and other forms of pollution and address existing areas of poor air quality and other pollution.*

AQMAs and AQFAs in the Borough



Biodiversity and green infrastructure

Lewisham’s network of green and open spaces, waterways and green features (such as parks, street trees and residential gardens) make an important contribution to local character and heritage. They are also integral to supporting sustainable communities and healthy lifestyles, providing a wide range of environmental, social and economic benefits. Green infrastructure should be protected and opportunities taken to enhance provision across the Borough, including by enhancing or creating new links between green infrastructure.

Key strategic opportunities are associated with the river corridors, and in particular the corridor of the River Ravensbourne, which is identified as a Strategic Corridor of London-wide significance by the All London Green Grid Supplementary Planning Guidance.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Conserve and enhance biodiversity and green infrastructure at all scales noting in particular the strategic importance of the river corridors, green spaces and other local assets that contribute to the All London Green Grid.*

Elements of the All London Green Grid Framework



Climate change adaptation

The water environment is a defining feature of Lewisham. The Borough fronts onto the River Thames and the river poses a potential risk of flooding, although the adjacent land area benefits from the River Thames Tidal Defences. Lewisham also falls within most of the catchment of the River Ravensbourne and its tributaries, including the Quaggy, the Pool and Kyd Brook, which outfalls into the River Thames at Deptford Creek. Elsewhere there are localised areas that are at potential risk from other sources of flooding including through surface water run-off, ground water flooding, surcharge from the sewer network and the blockage of culverts and gullies.

The council regularly reviews its Strategic Flood Risk Assessment (SFRA), the latest of which was published in 2019 and includes a Level 1 and Level 2 SFRA. The SFRA maps flood zones according to the probability of flooding occurring, discounting the presence of any flood defences and alleviation measures. Lewisham's Surface Water Management Plan (SWMP) provides additional information on other sources of flood risk.

In line with the NPPF and its associated guidance there is a need to apply a sequential approach to the location of new development. This is in order to ensure that development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. There is a need to consider the appropriateness of proposed uses within the different flood zones having regard to Flood Risk Assessments (FRAs) submitted by applicants, albeit there is an inherent challenge in that FRAs will not always be available to inform the Local Plan.

Flood risk zones



Finally, there is a need to note the TE2100 Briefing for Lewisham (October 2020). The Environment Agency responded to the Draft Plan consultation (2020) explaining:

“We are keen to continue partnership working with you to deliver the Thames Estuary 2100 plan (TE2100) plan at Deptford Creek and the River Thames to ensure tidal flood risk is managed proactively in Lewisham. Please refer to the latest “TE2100 Briefing for Lewisham” (October 2020) which provides updates and explains the actions required now and in the future to manage tidal flood risk and delivery through the “riverside strategy” approach to improve riverside environments through partnership approach.

The TE2100 Plan’s requirements for Lewisham include future raising of all tidal flood defences, together with an ongoing programme of inspection, maintenance, repair and replacement of defences as required. Corridors of land alongside the existing defences should be safeguarded to provide space for these works and “make space for water” through increased riverside buffer zones aiming for 16 metres in tidal areas. Landowners and decision makers have a responsibility to maintain and raise tidal flood defences and follow the latest good practice policies and guidance such as the Estuary Edges guidance.”

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Avoid development in areas of flood risk, reduce existing flood risk where possible and implement wider measures to ensure that communities are made more resilient and able to adapt to the impacts of climate change.*

Climate change mitigation

Lewisham is committed to tackling climate change and declared a ‘climate emergency’ in February 2019. The Borough is also committed to playing its part in realising the London Plan objective for London to become a zero carbon city by 2050.

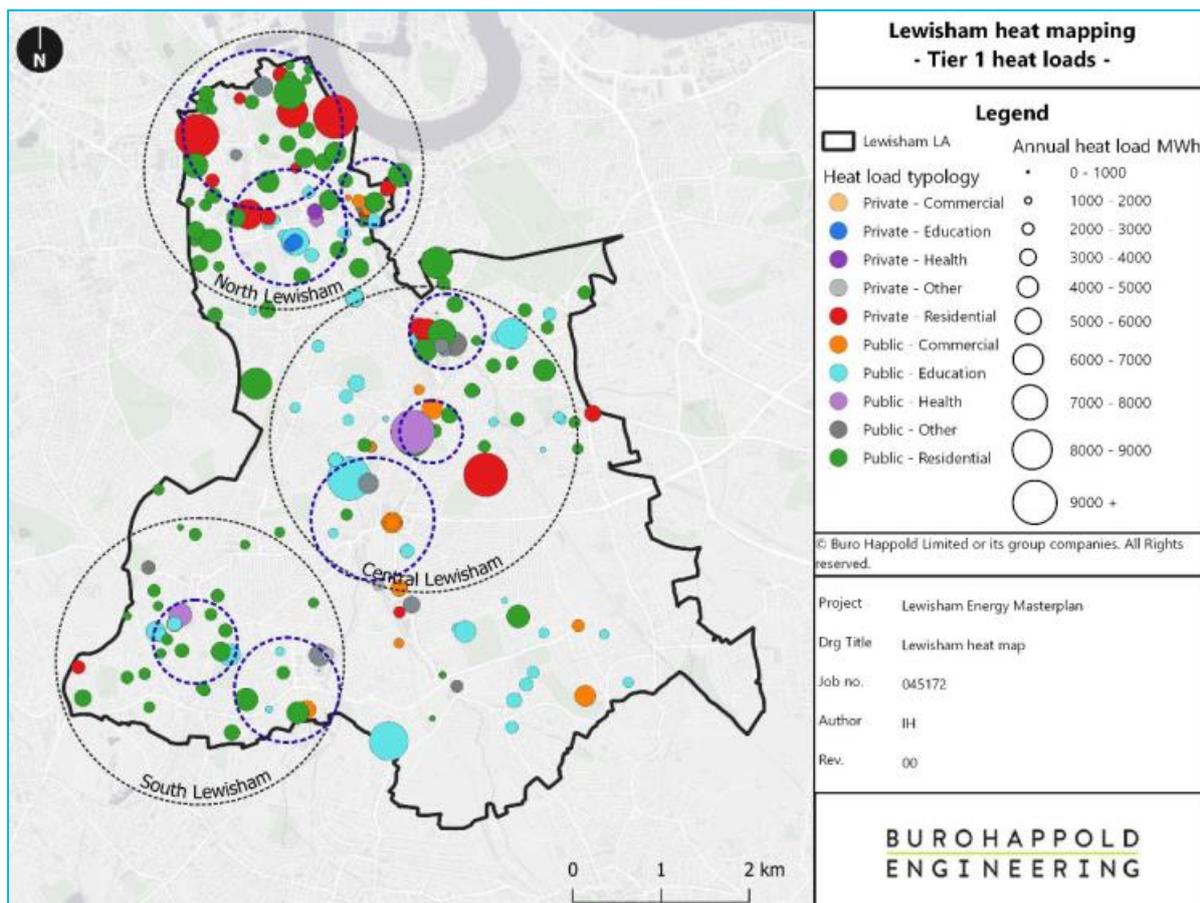
There is broadly a need to focus attention on (average per capita, as opposed to total) emissions from transport and the built environment, with it being appropriate to focus on the latter matter here, under the ‘Climate change mitigation’ banner, recognising that emissions from transport is a highly cross-cutting matter.

In this respect a primary consideration is the need to support delivery of heat networks and maximise the number of homes that are connected to a heat network (with a secondary consideration being the need to support energy efficiency and delivery of small scale and micro power generation, e.g. solar panels). Heat networks are costly and technically challenging to deliver, hence there is a need to make the most of locational opportunities, which means:

- Proximity to a strategic heat source, which can be heat at high temperature from CHP, industry or waste management, or heat at low temperature from the ground or water, given heat pump technologies;
- Proximity to a major source of heat demand (also cooling), such as a civic building; and
- Support for strategic-scale mixed use schemes that achieve economies of scale and lead to a balanced heat demand profile.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Minimise per capita emissions of greenhouse gasses, including by supporting energy efficient buildings and generation of heat/power from low carbon sources (notably district heating / heat networks).*

Areas with a high density of heat demand³⁴



Communities 1: Accessibility

The rapid population growth experienced in Lewisham in recent years is expected to continue, with projections estimating a 19% population growth between 2017 and 2040. This will likely put further pressure on local services and infrastructure, and may exacerbate issues around access to high quality housing and affordability. At the same

³⁴ This figure is sourced from an early draft of the emerging Lewisham Energy Masterplan. The findings of the emerging Masterplan were otherwise not available to inform this Interim IIA Report.

time, there are likely to be new opportunities and local benefits arising from growth, for example, through the revitalisation and regeneration of town centres, renewal of employment land and greater investment in services and strategic infrastructure, particularly transport infrastructure.

There has been significant investment in recent years in many parts of Lewisham. This has largely been concentrated in the north of the Borough and in Lewisham major town centre and its surrounds, coinciding with the significant amount of new housing and transport infrastructure in these areas.

Whilst levels of deprivation have improved recently Lewisham remains within the 20% most deprived local authorities in England, and is the tenth most deprived London Borough. It has the highest proportion of children and young people, and older people in economic deprivation in the country. There are also pronounced concentrations of deprivation in many local areas. Life expectancy across Lewisham is comparable to the London average, however in the most deprived areas life expectancy is 6.1 years lower for males and 5.1 years lower for females. Future investment will need to consider these inequalities and varied geographies of deprivation

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Deliver new and upgraded community facilities to meet the needs of a growing population and address capacity issues.*

Areas of relative deprivation

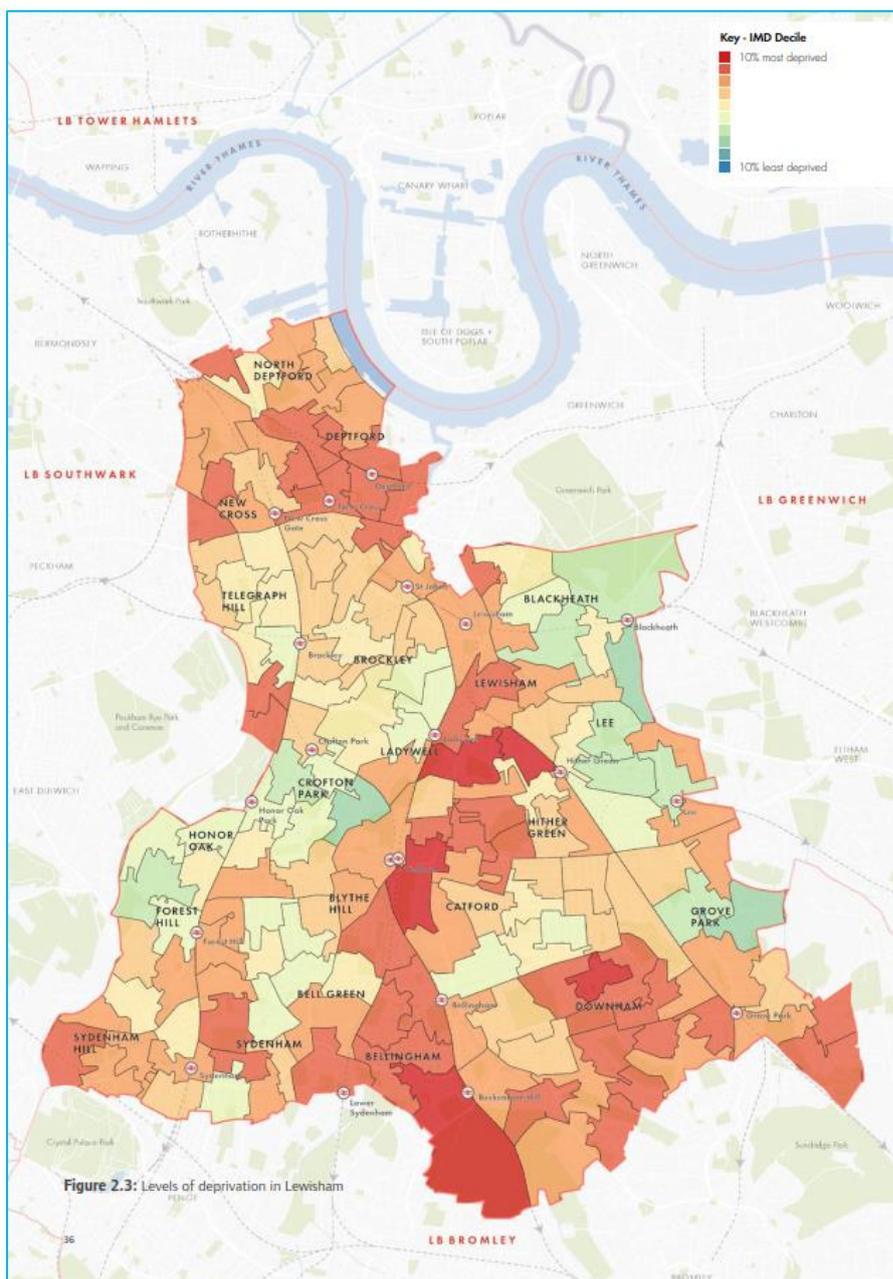


Figure 2.3: Levels of deprivation in Lewisham

Communities 2: Housing

Lewisham has a mix of housing stock, size and tenure, with a rapidly growing private rented sector. Median house prices in Lewisham have risen over 310% from £99,995 in 2000 to £412,000 in 2017. Whilst monthly private rental prices have remained relatively low, median rental prices increased 35% from 2010 to 2017 (London average 14%). In 2017 average private rents were 43% of average household incomes.

The London Plan sets out the challenge facing all London boroughs to deliver a significant increase in housing to meet current and future needs across the region. In order to address the identified needs, it sets out 10-year housing targets for all boroughs. Lewisham's target is 16,670 net housing completions (or 1,667 net new homes per year). Alternatively, a Local Housing Need (LHN) figure for the Borough is calculated using the method set out in national policy. This method suggests that the minimum housing need is up to 2,964 net units per year.

There is also a need to meet needs for affordable and specialist housing, and to ensure that the required mix of housing is delivered and that housing is built to appropriate standards, including in respect of space standards.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Make provision for housing needs as far as possible, including in respect of genuinely affordable housing, and ensure high quality living environments.*

Communities 3: Wider issues

There is a pressing need to reduce inequality and the negative consequences of deprivation in the Borough, and to positively seek to ensure equality of opportunity, especially for those living in the Borough's most deprived areas.

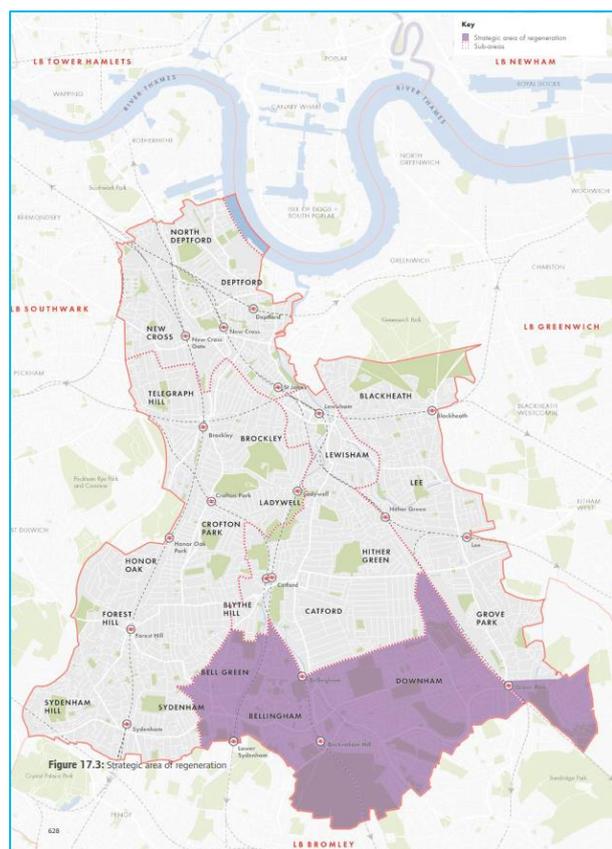
Issues are wide-ranging, inter-related / cross-cutting and complex. The following list of Local Plan objectives, amongst others, serves to illustrate this point:

- Sustain and create inclusive communities that both reflect and reinforce the diversity and cultural heritage of Lewisham's people and places, by coordinating investment in such a way as to promote equality of opportunity for everyone to enjoy a good quality of life in Lewisham.
- Address the wider determinants of physical and mental health and deprivation in an integrated and systematic way to improve the wellbeing of the population, to reduce health and other inequalities particularly where these are geographically concentrated, and to give children and young people the best start in life.
- Promote cohesive and liveable communities by ensuring mixed and balanced neighbourhoods where development is carefully integrated and designed to secure high quality, legible and permeable spaces that are inclusive and easy to access by everyone.
- Create safer communities and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.

Under this heading of 'Wider issues' there is a need to give consideration to communities-related issues and opportunities that are not more appropriately dealt with under another IIA Framework heading. As part of this there is a need to ensure that consideration is given to the potential for the Local Plan to impact groups with protected characteristics under the Equality Act 2010, although it is inherently challenging to establish a significant cause-effect relationship, between the Local Plan and protected characteristic groups, where the group is not known to be geographically concentrated, or known to be closely associated with a particular type of land use being addressed through the Local Plan.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Support strong communities, equality of opportunity and good health; and address existing areas of deprivation, exclusion, poor health and crime.*

The Strategic Area of Regeneration



Economy

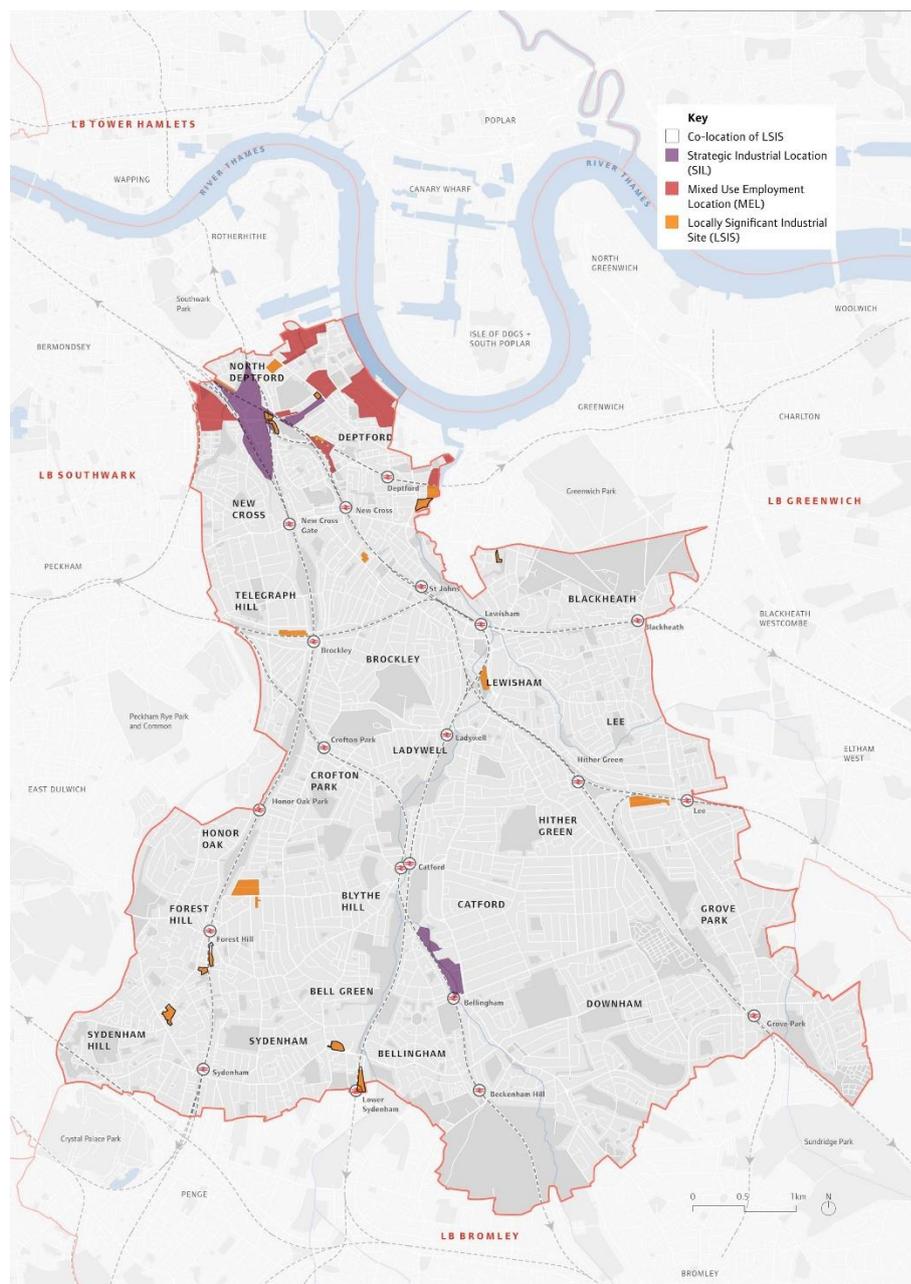
Industrial and commercial activity is largely focussed towards the Borough's designated employment locations and town centres, including two London Plan Strategic Industrial Locations (SIL). A plan-led process of industrial land consolidation has been facilitated by the council over recent years, particularly to support strategic regeneration projects. However, a significant amount of employment land and floorspace has also been lost through piecemeal development, aided by the introduction of new permitted development rights. Whilst local employment sites are under increasing pressure for change of use, there is a tight supply of industrial land and relatively healthy industrial market, with a strong demand for workspace, low vacancy rates, and limited availability at key locations.

The Borough has a well-functioning network of town centres, although vacancy rates are an increasing concern. The use of multi-channel (on-line) shopping is changing the way in which people use centres.

Evidence shows that there is a need to secure additional retail and employment floorspace in Lewisham. Over the next 15 years, there is an estimated demand for approximately 14,500 net additional square metres of retail floorspace and 15,000 net additional square metres of employment floorspace. By planning to meet this need, the Local Plan help to address the economic issues facing high streets and support the evolving role of town centres as leisure and entertainment destinations. There is also a need to support an increase in local jobs, meet the particular employment needs of local communities, including those with lower skills, and assist in growing the creative and digital industry clusters.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Support an inclusive economy by steering investment to town centres and other employment hubs and supporting the growth of priority sectors including the cultural, creative and digital industries.*

Designated employment land



Historic environment, heritage, character and culture

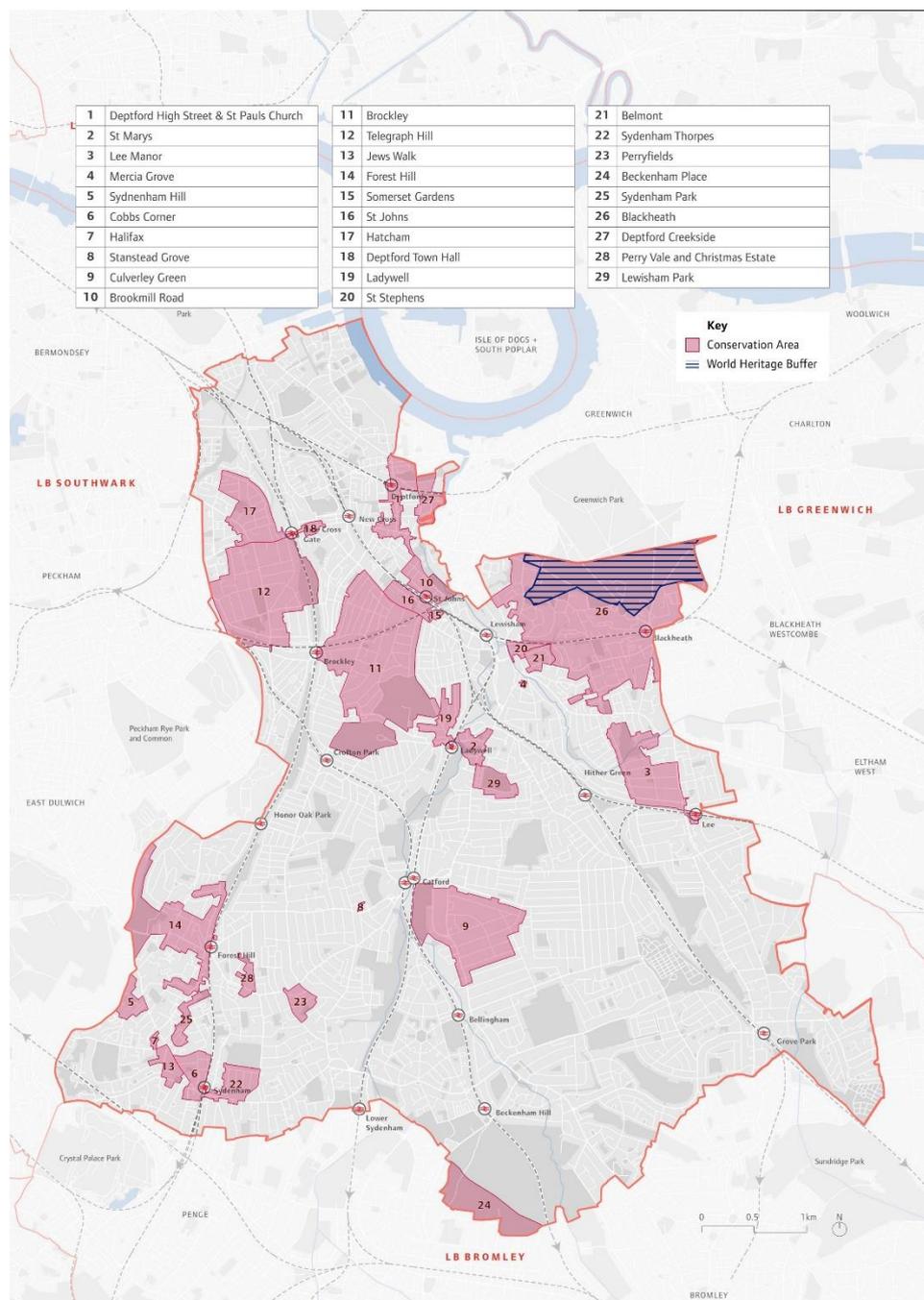
Lewisham has many diverse places, neighbourhoods, and communities shaped by the Borough's varied history, which the Lewisham Characterisation Study (2019) breaks down into six periods: Ancient Lewisham (pre-1700s); Town and country (1700-1800); Unlocking the south (1800s-1850s); Rise of the commuter suburbs (1860-1914); Interwar (1915-1949); and Rebuilding Lewisham (1950s onwards). Settlement firstly followed the river valley as far as Catford, before higher land was developed in the mid-1800s.

Lewisham's diverse history is reflected in the historic environment that features over 600 statutory listed buildings, 29 conservation areas, as well as Lewisham's varied and vibrant cultural scene.

To accommodate growth and investment in a coordinated manner the Local Plan will need to carefully consider the existing assets, the wider character of local places and neighbourhoods, and the mixed and diverse communities that make Lewisham so unique.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Conserve and enhance the historic environment; retain and reinforce the distinctive character and identity of Lewisham's neighbourhoods and townscapes and support Lewisham's thriving and evolving cultural identity.*

Designated conservation areas



Land and natural resources

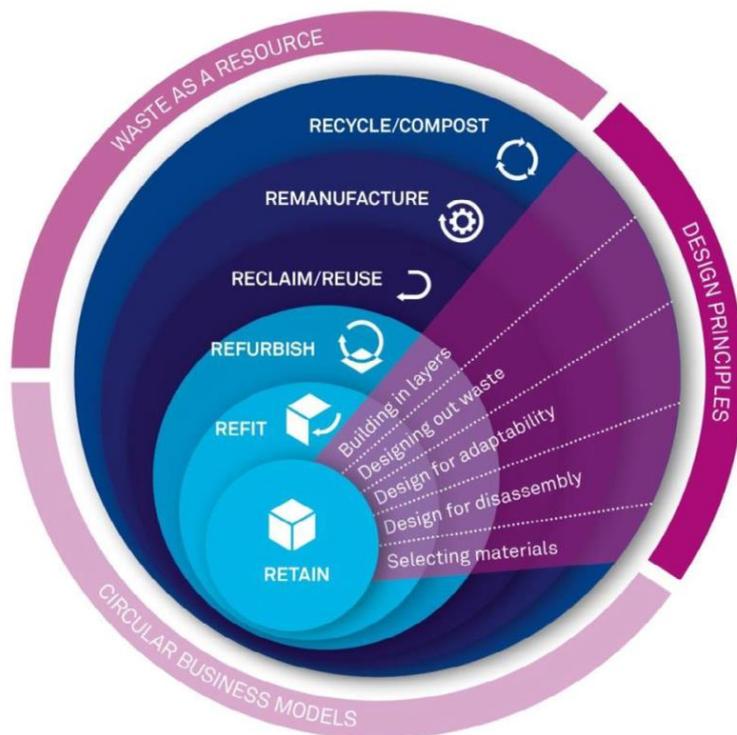
The London Plan advocates the ‘circular economy’ as a strategic approach to the sustainable use and management of materials and waste. The circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. There is the potential to implement circular economy principles at the design and construction stages of development, as well as during the operational lifetime of development.

The London Plan also includes a strategic objective for London to be net waste self-sufficient by 2026. This means that all waste generated in the city should also be managed within it, rather than being exported elsewhere. To support this objective the London Plan apportions a per cent share of London’s total waste to be managed by each Borough, which is set out in tonnes. It then requires Boroughs to allocate sufficient land or sites, and identify facilities, to manage the apportioned tonnages of waste. This means that the Borough must pool and manage the waste apportionment within its sub-region, working in partnership with other local authorities in the South East London Joint Waste Planning Group. The South East London Joint Waste Technical Paper provides further details on the pooled apportionment and strategic sites with capacity to manage this over the long-term.

Aside from waste management / supporting a circular economy, there is a need to make best use of land as a natural resource, which means prioritising brownfield land for development optimising development densities. All large areas of greenfield land in Lewisham are designated, and hence not likely to come under pressure for development; however, there is also a need to consider greenfield 'backland development' and 'garden grabbing'.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Make best use of land through directing new development to brownfield land and sites, supporting higher density development where appropriate; minimise waste by supporting a circular economy; and address contaminated land.*

Circular economy principles



Transport

Lewisham has varied transport connectivity, with the northern and central areas generally well served by public transport, whilst the far north and south east of the Borough have poorer infrastructure and lower public transport coverage. This contributes to a relatively high proportion of daily trips being made by car and motorcycle. Daily cycle trips are at a comparable level to inner-London.

To achieve a successful multi-centred Borough it is vital that there are legible, high quality, safe and efficient routes both to and between town centres and neighbourhoods. Crucially, such routes must support sustainable modes of movement by giving priority to walking, cycling and the use of public transport. The future prospects and viability of Lewisham's town centres will rely heavily on their capability to be accessed safely and easily by all residents, workers and visitors. Also, with a well-connected town centre network, individual centres will be better placed to sustain or evolve their specific roles as the population is enabled to use them with more regularity.

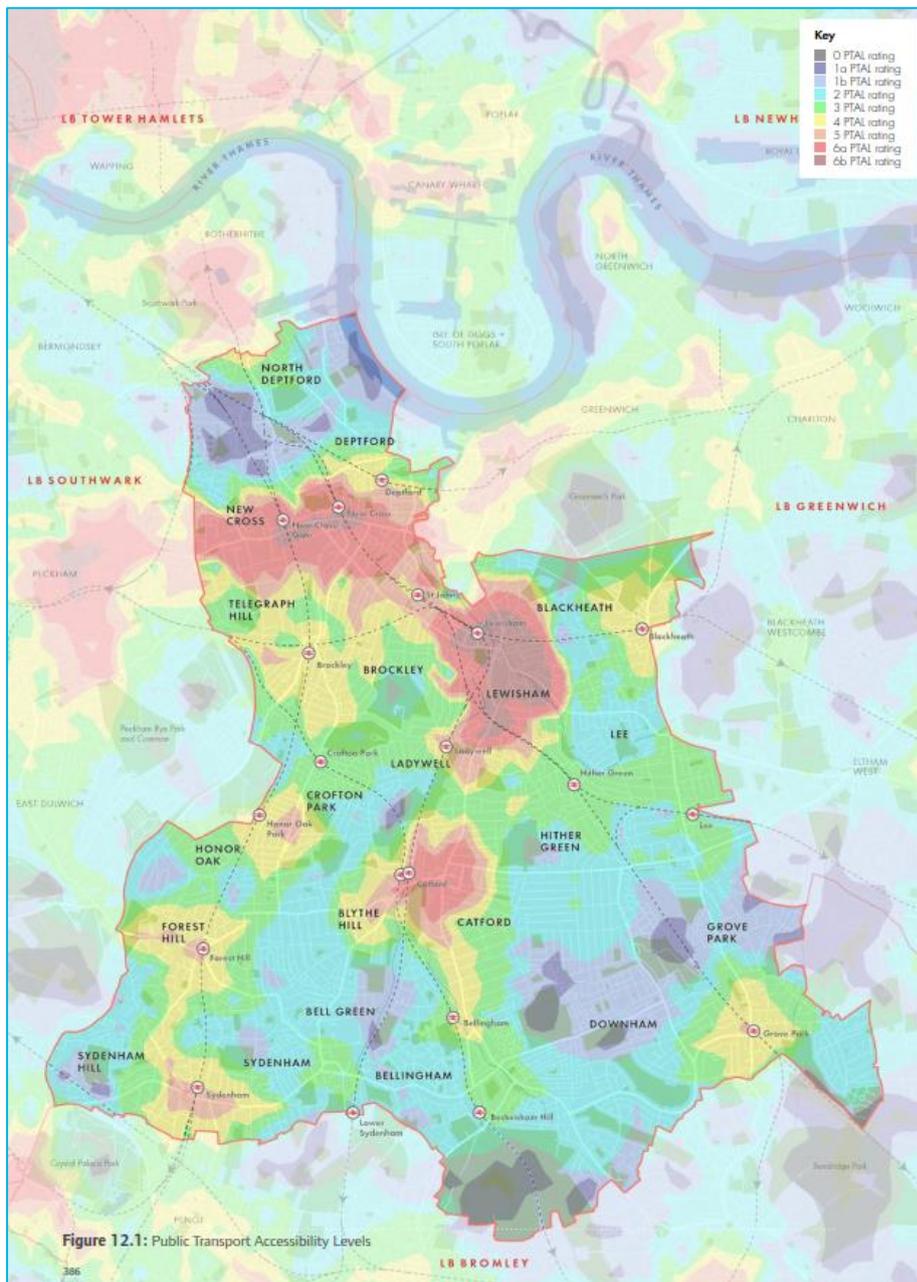
The London Plan Opportunity Areas define a central growth corridor in Lewisham, which covers a large area to the north of the Borough and extends southward taking in the town centres at New Cross, Lewisham and Catford. This corridor features a principal road network, centred on the A21 corridor (Lewisham High Street, Rushey Green and Bromley Road). Elsewhere there are several strategic roads linking town centres and neighbourhoods both within and beyond the Borough boundary. These roads include: the A20 (an historic east-west route from central London to Kent and the south east); the A205 South Circular (an orbital route from Woolwich to Chiswick, traversing Lee, Catford and Forest Hill); and the A212 (which links the South Circular to Croydon).

At present these strategic roads prioritise vehicular flows, or their ‘link’ function, above any ‘place’ function and potential contribution they may make to the quality of the neighbourhoods and centres they connect with and move through. In addition, the particular qualities of the strategic roads (such as their width and environmental quality) means that they possess their own spatial character as ‘corridors’ and can therefore appear incongruous with the areas they traverse. There is an opportunity for greater intensification along strategic routes, where development responds to the status of the road and its greater degree of connectivity. Furthermore, the quality and functionality of these corridors can be improved through development delivering on the Healthy Streets principles, giving priority to pedestrians and cyclists.

The London Plan identifies the proposed Bakerloo Line Extension (BLE) as a key strategic transport infrastructure. The preferred route of the BLE proposes phase 1 extending from Elephant & Castle via Old Kent Road with stations at New Cross Gate and Lewisham. A potential phase 2 extension of the Bakerloo Line is being discussed that would run further south into the Borough. The BLE presents a key opportunity to reinforce Lewisham’s strategic role as a transport hub servicing the sub-region, and to deliver substantial investment.

In light of these key issues and opportunities for the Local Plan, the following IIA was established: *Ensure an effective and efficient transport network by minimising the need to travel and supporting modal shift towards walking, cycling and public transport, including by supporting major infrastructure upgrades.*

Public transport accessibility (PTAL) levels



Appendix III: EqIA

Introduction

As discussed within Section 3.3:

- The Equality Act 2010 (the Act) introduced a public sector equality duty. It covers the following protected characteristics: age, disability, gender re-assignment, marriage and civil partnership, pregnancy and maternity, race (including nationality and ethnic origin), religion or belief, sex (male/female) and sexual orientation.
- Under the duty the Council must, in the exercise of its functions, have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and those who do not; and foster good relations between people who share a protected characteristic and those who do not.
- Equalities issues and impacts are considered under all of the IIA framework topic headings, and a stand-alone discussion (integrated with health considerations) is presented under the “Communities (Wider issues)” heading. A further stand-alone discussion is presented in this appendix.
- However, it is inherently challenging to identify a cause-effect relationship between Local Plan interventions on one hand and equalities issues on the other, given uncertainty regarding the ‘on the ground’ implications of strategic interventions and uncertainty in respect of how equalities issues vary spatially. In many cases there is a lack of evidence to show how groups with protected characteristic groups are geographically spread/concentrated, or to show that groups have a particular association with one or more of the types of land use being addressed through the Local Plan.
- One important step that can be taken through the Local Plan is to focus efforts on addressing areas and smaller pockets of relative deprivation, which can be identified using readily available data sources. This approach reflects an understanding that there is a strong link between relative deprivation and equality of opportunity for groups with protected characteristics under the Equalities Act 2010.³⁵

Having made these initial points, the following two headings:

- Present an initial screening of protected characteristic groups; and then
- Give consideration to key Local Plan EqIA issues/impacts.

Screening protected characteristic groups

The protected characteristic groups most relevant to Local Plan-making are age, gender, disability, race/ethnicity and religion/belief. This is on the basis that there can be evidence or, more generally, some understanding, of how groups with these protected characteristics associate with particular areas within the Borough, or particular types of land use set to be addressed via the Local Plan. Notably –

- The elderly and disabled – can have particular accommodation needs that can require allocation and/or development management policy through the Local Plan, and can also have mobility needs that must be taken into account when selecting sites for allocation, assigning indicative development densities and considering required upgrades to transport infrastructure and the urban realm. Pregnant women and mothers with young children can also have similar requirements in respect of transport infrastructure and the urban realm.
- Children and young people – the Covid-19 pandemic has served to highlight the importance of access to green / outdoor playspace for children, plus there are concerns regarding how the pandemic is affecting young people’s education (including concerns around online learning) and training/career opportunities. There is an epidemic of anxiety and mental health issues facing young people from the uncertainty of their futures and plan making may need to adjust to accommodate more home based / remote / online learning and working going forward. There is also a need to consider community space for remote learning / working.
- Gender can affect inequalities. For example, life expectancy is 5.8 years lower for men and 3.4 years lower for women in the most deprived areas of Lewisham than in the least deprived areas.

³⁵ The Measuring Poverty Report (2019) found, amongst other things, that: nearly half (46%) of people in families with a Black head of household and 37% of people in families with an Asian head of household are in poverty, compared to 19% of people in a family with a White head of household; and nearly half (48%) of people in poverty – totalling 6.8 million people – live in a family where someone is disabled. See <https://socialmetricscommission.org.uk/>

- Race, ethnicity and religion/belief groups can be associated with particular geographic locations within the Borough, although data can be limited (or potentially somewhat out of date, as it is based on the 2011 Census), and can also be associated with particular housing issues / needs. Groups may also be associated with certain employment sectors and areas with concentrations of certain types of businesses, including markets and areas with low rents that support small family businesses. With the Covid-19 pandemic in mind, it is also important to note that health impacts will be experienced differently by different people and communities, and there are strong links between social equity, race and health. There is evidence that Black and Minority Ethnic communities are at greater risk of dying from Covid-19.³⁶ This is also true for people living in deprived areas, demonstrating the close link between social inequity and health inequalities.

Other protected characteristic groups are of more limited relevance to the Local Plan. To reiterate, this is on the basis that there is no evidence, or understanding, of how groups with these protected characteristics associate with particular areas within the Borough, or particular types of land use set to be addressed via the Local Plan.

Key equalities issues/impacts

The discussion below is first and foremost a summary of issues/impacts discussed within Section 9 of this report. The opportunity is also taken to present an expanded discussion in respect of certain key issues, and to sign-post to sources of evidence.

Air and noise pollution

Air quality is an important equality consideration, including because: there can be a correlation between poor air quality and relative deprivation, and also between poor air quality and locations associated with a prevalence of particular ethnic groups;³⁷ and people with chronic health problems are among the most vulnerable to air pollution.

The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough. The effect should be to minimise 'need to travel by private car' (including taxis) amongst the Borough's residents and, in turn, minimise traffic and associated air pollution.

Further considerations relate to ensuring a high quality public realm. The recently published Health Equity in England: the Marmot Review 10 Years On (2020) report highlights the importance of addressing unhealthy highstreets, including on the basis that air and noise pollution lead to wide ranging indirect impacts (as opposed to headline direct impacts including: impaired quality of life leading to poor mental health, physical stress, physical inactivity and behavioural and psychological effects).³⁸ The Local Plan spatial strategy is strongly focused on delivering targeted enhancements to the urban realm in Lewisham and (in particular) Catford and along the A21 corridor; and there is also a focus on improving access to the rivers and open space (which tend to be geographically close to transport corridors and, indeed, suffer from severance by road and rail).

Green infrastructure

There is a growing body of evidence on the health benefits of access to good quality green spaces, and it can also bring other benefits such as greater community cohesion and reduced social isolation.³⁹ Additionally, the Covid-19 pandemic has demonstrated the need for access to greenspace in order to ensure mental and physical well-being, especially for those living in homes without gardens or private greenspaces.

The Local Plan spatial strategy is strongly focused on the central transport corridor that is also a river valley and strategic green infrastructure corridor. There will be opportunities to greatly improve access to green and blue infrastructure, including delivering high quality areas and routes that are accessible and appealing to different groups and communities, including those with mobility issues; however, it is not clear that there will be the opportunity to deliver any new areas of larger open space.

³⁶ See

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf

³⁷ See https://www.london.gov.uk/sites/default/files/aether_updated_london_air_pollution_exposure_final.pdf (in particular, see conclusions on page 37)

³⁸ See <https://www.health.org.uk/publications/reports/the-marmot-review-10-years-on>

³⁹ See <https://www.gov.uk/government/publications/local-action-on-health-inequalities-evidence-papers>

Flood risk

Areas of relative deprivation can tend to be disproportionately affected by flood risk,⁴⁰ and hence there is a need to consider whether the Local Plan could, to some extent, be perpetuating this issue by allocating a number of sites in the flood risk zone. Whilst there is little reason to suggest that house prices of new developments in the flood risk zone will be lower than typical market rates for the area, were a development to be affected by one or more flood risk events this could decrease house prices. There is also a need to consider the increased vulnerability to flooding events of individuals with more limited mobility.

Housing density / tall buildings

The Local Plan seeks to support higher densities in certain targeted locations, in accordance with the London Plan SHLAA standard methodology, and taller buildings in certain locations as a means of achieving higher density whilst at the same time ensuring sufficient land for associated open space and other uses. Higher density development and taller buildings could potentially lead to challenges in the future under a scenario whereby there is an increased prevalence of heat waves and extreme rainfall events, and there is also a need to consider the importance of ease of access to open and green space during any future pandemic akin to Covid 19. The elderly and disabled people can be susceptible to high temperatures and may have mobility issues that create challenges in respect of accessing open and green space. There can be similar challenges for pregnant women and for parents of babies and young children.

Heat pumps and heat networks

The Local Plan is a primary opportunity to support the transition away from gas and towards the electrification of heating. However, there are equalities considerations, as there is a risk of higher costs being passed onto the consumer, thereby exacerbating issues of fuel poverty. It is also important to note that the Covid-19 crisis has led to increased home working and, in turn, increased home energy consumption, potentially leading to fuel poverty becoming a more widespread issue. It is therefore imperative that the transition to heat pumps is coupled with efficiency measures to reduce demand. Focusing on heat networks, this matter is a key focus of the Heat Trust, who offer a certification scheme that aims to ensure that consumers are protected. The Heat Trust explain:⁴¹

“The heat network sector is diverse, with thousands of individual heat network providers, of all shapes and sizes, but the market is currently unregulated... Consumer protection is essential to the long-term success of heat networks. We’re putting in place the foundations of regulations that will protect customers while allowing this exciting new industry to flourish.”

Strategic Area of Regeneration

The proposed spatial strategy is broadly supported in that the aim is to focus growth on the most accessible areas and those less accessible areas where there is the potential for growth to support / unlock new strategic community and transport infrastructure (also employment), namely within the south of the Borough, including within the Strategic Area of Regeneration, where relative deprivation is closely linked to accessibility, with the Local Plan explaining: *“The LCC estates strongly influence the character Bellingham and Downham, and the area is generally characterised by wide residential streets punctuated by smaller shopping parades, with few community facilities and limited employment opportunities. This means that residents often have to travel to access key services and jobs. The area has a relatively low population density and has not benefitted from the same level of investment as other parts of the Borough owing, in part, to the lack of development sites.”* However, at the current time there remains a degree of uncertainty in respect of how far east, into the Strategic Area of Regeneration, the benefits of strategic growth at Bell Green / Lower Sydenham would be felt.

Catford town centre regeneration

The scale of change will have significant implications for existing communities and businesses in the area, which the emerging Masterplan describes as being associated with *“an established community with a strong sense of identity”* and an *“informality that is a draw and a comfort for many.”* Whilst it is not the aim of this IIA to assess the emerging masterplan, key points to note include:

⁴⁰ See, for example, assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/291064/scho0905bjol-e-e.pdf and assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/292928/geho0609bqds-e-e.pdf

⁴¹ See heattrust.org/about

- Overall strategy – there is certainly a need for regeneration, given a range of specific issues, notably: the dominance of the South Circular/Catford Road and surrounding road network, which has a major impact on environmental quality and the cohesiveness of the town centre; a poor sense of arrival into the town centre; a shopping mall that is hidden and inward-looking and provides a limited retail offer; Milford Towers that are in a poor state of repair; and a dispersed and poorly linked set of Council offices that would benefit from being reconfigured and consolidated. The broad proposal to deliver a new cultural and civic hub and surrounding retail area is also supported, as are ambition statements including: *“The ambition is to reinforce Catford’s point of difference as a cultural destination and to improve and diversify the leisure offer and the night-time economy...”* However, there is potentially a need for further work to understand the nature of existing communities and businesses, and how they will be able to adapt and thrive during and following the regeneration.
- The Yards – this area is described as hosting “an eclectic mix of buildings from different eras”, which could, in turn, suggest that this area is associated with community and business diversity, although it is recognised that the overall conclusion reached by the Masterplan is that: *“The area as a whole is underutilised and underdeveloped”*. The objective for the area is *“to become a creative and entrepreneurial cluster for Catford’s existing and future independent businesses, providing a range of spaces with a street presence”* and the proposal to deliver *“external yard spaces [that are hard working and durable, and function as open air workshops for construction, creation and recreation”*. This is supported, from an equalities perspective; however, it is recommended that further consideration is given to avoiding and mitigating impacts to existing communities and businesses.
- The Lanes – the emerging Masterplan notes that: *“Decanting of residents and shop owners has already started, and meanwhile uses such as Catford Mews are now activating the shopping centre until its phased demolition.”* If there are lessons to be learned from early work dealing with existing businesses and communities then it will be important that these feed-into the Local Plan and Masterplan.

The BLE LEIA (2020) explores the potential to enhance the economy of Catford, highlighting that the town centre is associated with low levels of employment in knowledge, which is certainly an issue to be addressed. The downside could be in respect of increasing land values pricing out existing businesses, with the LEIA explaining that: *“Independent businesses and those relying on lower value space are most likely to be at risk as rental values increase, existing sites are redeveloped, and the economy shifts to higher value employment.”* However, given the low baseline, in respect of knowledge industry jobs, there are limited concerns. Also, concerns are allayed given Local Plan support for increased delivery of affordable workspace, with the LEIA suggesting: *“The BLE would help make the delivery of lower cost creative workspace more viable in Catford, which could help to relieve the pressure of rising prices and high demand in New Cross Gate.”* The LEIA also suggests: *“extensive Council ownership and control of the area provides additional scope to curate the high street and support local small businesses.”* Also of note are the following policy requirements, proposed for the Catford Shopping Centre and Catford Island proposed allocations respectively:

“Buildings should provide for a range of footprint sizes to accommodate a variety of town centre, commercial and community uses, and be designed to provide flexibility to enable sub-division of units.”

“Retail and commercial elements should reflect the site’s immediate town centre context, providing a mix of unit sizes and workspaces to support a wide range of uses and businesses.”

District centre regeneration

A stand-out opportunity is associated with Lee Green borough town centre, where there is a cluster of three proposed allocations, including Leegate Shopping centre (for which a planning application was submitted in 2018) and the adjacent Lee Green Sainsbury’s site. This area is associated with a degree of relative deprivation, in an otherwise more affluent part of the Borough. It will be important to ensure that the sites are masterplanned as a whole as far as possible, albeit this may be a challenge given the current application for Leegate Shopping Centre.

There is also a notable opportunity at Grove Park local centre, which serves both Grove Park to the east and Downham to the west. Downham falls within the Strategic Area of Regeneration and Grove Park is also associated with certain issue, with the Local Plan explaining: *“Grove Park is located to the very south of the Borough and is somewhat disconnected from its surrounding areas. This is owing to railway lines to the northeast and southwest that create physical barriers and contribute to severance, along with the South Circular...”* The proposed allocation, which is known as “Sainsbury Local and West of Grove Park Station” comprises of a number of sites located within Grove Park local centre, which are currently occupied by a range of uses. An ambitious approach is proposed in respect of assembling sites in order to deliver a comprehensive (albeit small scale; net 78 homes) redevelopment to support the long-term vitality and viability of the local centre.

A final important consideration is the need to accommodate increasing numbers of people, including young people, undertaking remote/online learning, training and employment opportunities, particularly for people who lack sufficient space within the home. It is recommended that this should be a focus of work around town and district centre regeneration, as part of plan finalisation.

Existing community facilities

As per the Local Plan, community facilities are essential to health and wellbeing. Safeguarding and securing community infrastructure is an important way to ensure local communities have access to affordable, high quality facilities, especially in deprived areas. Redevelopment of existing community facilities should be approached with care. Where there is an identified need, it is crucial that important community facilities and services are not lost during redevelopment process since the resulting impact on the health and wellbeing local communities could be serious, especially following the end of Covid-19. The Local Plan provides a clear policy direction in terms of the redevelopment and/or re-purposing of community facilities, where proposals are demonstrably linked to investment programme as part of the one public sector estate.

Notable sites where the proposal is for mixed use redevelopment of existing community facilities are:

- Sydenham Green Group Practice comprises an existing large health centre adjacent to the proposed BGLS strategic growth area; however, it is assumed that development would re-provide and potentially help to support the improvement of health infrastructure.
- Jenner Health Centre, in the west of the Borough, does not fall within a strategic growth area, hence there is less to be gained by redevelopment, relative to the Sydenham Green Group Practice site; however, it is again fair to assume that health infrastructure will be sufficiently re-provided as part of the redevelopment, hence there are limited concerns and, indeed, potentially no concerns beyond short term impacts during the construction phase.
- Catford Policy Station - there are no concerns in this regard, as it is certainly fair to assume that policy operational capacity will not be unduly impacted by allocation and redevelopment of the site (and this is a stated requirement within site-specific policy).

Also, there is a need to note the strategy in respect of mixed use redevelopment of out-of-centre retail facilities, notably Ravensbourne Retail Park, Bell Green Retail Park, Homebase/Argos Bromley Road and Bestway Cash and Carry. Other commercial uses are also set to be lost, including car servicing and builder's merchants, and several car parks are proposed for redevelopment; however, in the great majority of cases there is a clear strategic argument for redevelopment that extends well beyond simply housing delivery.

Housing

Access to high quality housing, including family housing, affordable housing and specialist housing, is a key consideration when seeking to ensure equality of opportunity, including amongst black and minority ethnic (BAME) groups who are more likely to experience housing deprivation, overcrowding and homelessness than White British households.⁴² Households with children are also more likely to experience housing deprivation and this likelihood is increased for most ethnic groups. The provision of specialist housing for disabled people and the elderly is a particular challenge nationally, including due to the ageing population.

Whilst there is uncertainty at this stage in the planning process regarding the capacity of certain of the proposed allocations, the assumption is that the Plan would meet and modestly exceed the target established by the draft New London Plan (as currently understood),¹⁶ whilst there will be the potential to close the gap' between housing supply and Local Housing Need (LHN), as understood from the Lewisham Strategic Housing Market Assessment (SHMA, 2019), under a BLE Phase 2 scenario.

With regards to affordable housing, an ambitious approach is proposed involving 50% affordable housing and application of a locally specific definition of affordable housing; however, there will be a need for further work to confirm the viability of this approach, also taking into account the costs of additional financial burdens that will be placed on developers, relating to wide ranging other policy objectives.

The regeneration of Catford town centre could prove a key focus area, in respect of meeting affordable housing needs. The BLE LEIA (2020) that under a BLE scenario house prices locally will increase in the vicinity of BLE station, thereby leading to more residents in need of affordable housing, which, in turn, suggests a need to support a higher housing growth strategy locally. The LEIA identifies that within Catford: *“Strong increases in house prices in recent years... coupled with high levels of deprivation and low average household incomes in the area... suggests that Catford is becoming an increasingly unaffordable place for certain sections of society and that those on low incomes are less likely to be able to access market rate housing.”*

⁴² See: <https://raceequalityfoundation.org.uk/wp-content/uploads/2018/02/Housing-Briefing-26.pdf>

Provision for specialist housing needs is another consideration, although this is a focus of only one of the proposed allocations, namely Featherstone Lodge, Eliot Bank, which is proposed for older person's accommodation. Other specialist housing needs are dealt with through development management policy, but there will be a need for further work ahead of plan finalisation to confirm that there is not a need for the Local Plan to take a more proactive approach through site allocation. It is also worth considering how, in light of the Covid-19 Pandemic, it may be the case that older people are more likely to want to remain in their own homes instead of living in care homes given both the recent funding crisis in the care sector and the rise in virus related deaths in care homes. Furthermore, for those that might still want to access specialist housing, the experiences of pandemic isolation could lead to a greater demand of certain attributes in the types of housing: people are likely to *need* spacious homes, homes located near green space, homes equipped with smart technology (for those who cannot access carers), and homes located close to community support networks in order to ensure their physical and mental well-being. These factors isolation might affect site allocation for specialist housing, and commercial housing developments in general.

Mixed use redevelopment of industrial land

The Local Plan includes a focus on mixed use redevelopment of existing employment sites, with the firm intention that: *“Development must not result in a net loss of industrial capacity, or compromise the functional integrity of the employment location.”* There will be a need to take steps to confirm that the Local Plan will not lead to a loss of employment opportunities in the light industry sector, where employees might find it difficult to find work in alternative sectors, and ensuring opportunities to access “good quality work”, which the Marmot Review (2020) defines as being *“characterised by features including job security; adequate pay for a healthy life; strong working relationships and social support; promotion of health, safety and psychosocial wellbeing; support for employee voice and representation; inclusion of varied and interesting work; promotion of learning development and skills; a good effort–reward balance; support for autonomy, control and task discretion; and good work–life balance.”*

Estate regeneration

Estate regeneration is a focus of three of the proposed allocations; however, two of the three allocations are committed, and indeed currently building-out. As for the uncommitted proposed allocation – Achilles Street – residents voted in support of estate regeneration in late 2019, such that the question for the Local Plan is now how it should happen, including in terms of development quantum. The latest proposal is for 363 homes at this 1.4 ha site, which is a reduction on the 651 homes anticipated at the Draft Plan stage, and is reflective of the findings of a residents ballot.

Waste management

One final consideration relates to putting in place measures within developments to support waste management. Consideration should be given to challenges that might be experienced by the elderly, disabled people and those with more limited mobility.

Appendix IV: DM Policy Alternatives

Introduction

The aim of this appendix is to present a 'high-level' assessment of reasonable alternatives for a select range of development management (DM) policy areas/issues, complementing the assessment of growth scenarios that is a focus of Part 1 of this report. Specifically, reasonable alternatives are defined and appraised in respect of:

- Mixed use development of industrial sites;
- Zero carbon development; and
- Re-routing the South Circular at Catford.

N.B. reasonable alternatives were defined and appraised for a total of ten policy issues/areas at the Regulation 18 stage; however, in the majority of the cases the appraisals presented at that stage are now somewhat out-of-date, given the latest national context (e.g. in respect of the potential to set policy to restrict use mix on high streets) and the latest evidence base (e.g. evidence from the recent Tall Buildings Study Addendum and Open Space Review), including evidence gathered through consultation in 2020 (e.g. comments received in respect of car parking policy). Out of date appraisals have not been presented here, for brevity, but are available in [Appendix IV](#) of the Interim SA Report (2020).

Assessment methodology

Assessment findings in respect of the three sets of alternatives introduced above are presented across the seven tables below.

Within each table a row deals with each element of the established assessment framework (see Section 3) in turn. Within each row the columns to the right hand side seek to rank the alternatives in order of performance, where one (also highlighted by a gold star) is best performing. Also, ' = ' is used to denote where it not possible to differentiate the alternatives with any confidence, and ' ? ' is used where there is a high degree of uncertainty.

Finally, please note that a final section, at the end of this appendix, presents summary appraisal conclusions.

A note on differentiating the alternatives

The appraisal matrices below do not contain any red / amber / green shading, unlike the appraisal matrix dealing with the appraisal of alternative growth scenarios in the main body of this report (Table 6.1). This reflects an approach whereby the aim of the appraisal is solely to differentiate between the alternatives in relative terms, as opposed to additionally predicting significant effects. In comparison to the appraisal of alternative growth scenarios presented in Section 6, there is very limited potential to reach meaningful conclusions on significant effects here.

Mixed use development of industrial sites

Assessment of alternatives

Option 1 - Introduce stronger protections for employment sites, so they remain in business use, whilst enabling the mixed-use redevelopment of some industrial sites for new workspace, housing and main town centre uses where the net effect would be no loss of business space.

Option 2 - Do not allow mixed-use redevelopment of industrial sites.

Topic	Option 1	Option 2	Commentary	
Air quality and other pollution	2	★1	Redevelopment of designated industrial sites has been a key policy issue in the London context for a number of years. The emerging new London Plan reflects a step-change in policy, seeking to address loss of industrial land capacity by supporting the “intensification” of existing sites, whereby higher value uses – primarily housing – are delivered alongside either a ‘no net loss’ of industrial capacity or a net increase.	
Biodiversity and green infrastructure	★1	2		
Climate change adaptation	2	★1		
Climate change mitigation	?	?		
Communities	Accessibility	★1	<p>Option 1 therefore supports a carefully targeted / plan-led approach to colocation of higher value uses on existing SIL and LSIS, in order to deliver renewal of the industrial floorspace / capacity and the long term viability of these sites. This will naturally include housing, as a high value land use, but will also include new employment space aimed at meeting the priority need for affordable workspace for micro, small and medium sized businesses operating in the cultural, creative and digital industries.</p> <p>There are clear benefits to this approach, particularly in light of proposed policies and supporting text – both Borough-wide (Policy EC2: Protecting employment sites and delivering new workspace) and site-specific – that support site masterplans, set stipulations regarding how industrial capacity is defined and measured (e.g. clarifying that new mezzanine space, whilst supported, should be excluded from calculations) and put an onus on the applicant to explore alternative design options (with supporting text notably highlighting that the needs of those businesses that require “a significant amount of operational yard or servicing space to function effectively” should be considered). It is clear from the London-wide context that there are increasingly effective design solutions to addressing the tensions that can otherwise exist between housing and industry (particularly light industry), and there is also the potential to learn from recent experience at MEL sites in Lewisham.</p>	
	Housing	★1		2
	Other issues	★1		2
Economy	★1	2	However, this strategy also gives rise to certain concerns	
Historic env, heritage, character and culture	★1	2	Firstly, there will inevitably be pressure on those industries less suited to colocation / operation within an intensified site to move their operations out of London. This may reflect organic evolution of industrial priorities, in certain respects (e.g. the increasing focus on warehousing for last mile deliveries); however, there is a need to consider implications for those who rely on existing ‘industries at risk’ for employment, who might be geographically clustered and/or tend to be at risk of unemployment.	
Land and natural resources	★1	2	Secondly, there can be instances where efforts to masterplan and design-out amenity / local environment impacts are not successful.	
Transport	★1	2	Thirdly, there is a tendency for industrial sites to be less suitable for housing, primarily due to flood risk but also due to close association with rail and/or major road corridors. Historically, transport corridors and industrial land in Lewisham has been located in valley bottom locations where there is significant flood risk. The relatively recent trend (London-wide) to redevelop industrial sites for housing has correlated with increasing understanding of ways to design-out flood risk; however, risks can remain, particularly given climate change.	

Zero carbon development

Assessment of alternatives

Option 1 - Ensure new developments meet the London Plan standards for sustainable design and construction and, as part of this, to allow flexibility for the use of carbon offset payments.

Option 2 - Require developments to meet carbon targets on-site in every case (i.e. no flexibility for offsetting)

Topic	Option 1	Option 2	Commentary
Air quality and other pollution	=	=	In order for Lewisham to become a net zero-carbon Borough by 2030 it will be crucial that new developments are designed to an ambitious zero carbon standard.
Biodiversity and green infrastructure	=	=	For all major residential developments in London a net zero target for regulated emissions ⁴³ has been in place since 2016, but Policy SI2 (Minimising greenhouse gas emissions) of the London Plan (2021) extends this to non-residential, as well as specifying certain other requirements. Specifically, the requirement is to achieve: a minimum 35% reduction ⁴⁴ in emissions on-site, with at least 10% (residential) or 15% (non-residential) of achieved through efficiency measures, in-line with an 'energy hierarchy approach', where the aim is to be "lean" as a priority, via energy efficiency measures, ahead of taking measures to source heat and power in a "clean" or "green" manner).
Climate change adaptation	=	=	Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be offset through cash in lieu contributions to a borough carbon offset fund and/or through specifically identified and deliverable off-site measures. The cash payments are based on a rate that has increased from £60/tCO ₂ (previous London Plan) to £95/tCO ₂ (current London Plan), with a view to disincentivising offsetting. Payment is calculated based on the annual residual emissions for a period of 30 years, resulting in a default price of £2,850 per annual tonne of residual CO ₂ emissions.
Climate change mitigation	2	1	Developers tend to target the minimum 35% on site saving as offsetting payments are typically less costly than on-site measures. However, on-site savings must be maximised . This reflects:
Communities	Accessibility	=	<ul style="list-style-type: none"> The well-known risks associated with offsetting, such that actual emissions savings are lower than the design intent of the offsetting scheme. For example, it is difficult to know for certain that offsetting measures are genuinely 'additional', in that they would not have happened in any case under a business as usual scenario.⁴⁵ The scale of ambition that is required in order to achieve 'true net zero', noting that: regulated emissions are often underestimated,⁴⁶ there are significant 'unregulated' sources of emissions from new build;⁴⁷ it will be very challenging to decarbonise the existing building stock that will still be in place by 2030; and there are a wide range of non-built environment emissions sources to tackle.
	Housing	1	
	Other issues	=	=
Economy	1	2	
Historic env, heritage, character and culture	=	=	In order to minimise offsetting the most effective mechanism would be to review the offset price. This should be done in light of the cost of delivering offset projects to a suitably high standard. Any steps that aim to prevent or increase the cost of offsetting would need careful viability testing, and there could be implications for spatial strategy (i.e. a need to focus on most viable sites).
Land and natural resources	=	=	
Transport	=	=	In conclusion , whilst Option 2 is preferable in theory, in terms of climate change mitigation, but it is not likely to be viable.

⁴³ Regulated emissions are those *operational* emissions associated with the operation of a building that are inherently related to building design and, in turn, covered by the Building Regulations.

⁴⁴ Measured against a baseline situation whereby the Target Emission Rate (TER) of Part L of Building Regulations for a gas boiler heated development is met.

⁴⁵ See discussion at page 15 of the GLA Guidance: [london.gov.uk/sites/default/files/carbon_offset_funds_guidance_2018.pdf](https://www.london.gov.uk/sites/default/files/carbon_offset_funds_guidance_2018.pdf)

⁴⁶ Government's Future Homes Standard Consultation document (2019) discusses a 'performance gap' between modelled and actual ('as built') regulated emissions. This is reflected in Policy SI2 of the ItP London Plan (2019) adding a new tier to the energy hierarchy – "be seen" – with the aim of encouraging modelling best practice and monitoring / evaluation of as built emissions.

⁴⁷ London Plan Policy I2 includes new focus / increased emphasis on **unregulated operational emissions** (emissions not covered by Part L of the Building Regulations, including as a result of plug-in loads, cooking and power use for communal areas, including lighting and lifts); and **embodied emissions**, which are the non-operational emissions associated with any building, covering both the emissions associated with a building at the time it is completed and non-operational emissions associated with subsequent stages of the building lifecycle, e.g. maintenance, repair, retrofitting, demolition and disposal.

Re-routing the South Circular at Catford

Assessment of alternatives

Option 1 - Re-route the South Circular to help regenerate Catford town centre, which will involve de-designation of a small area of Metropolitan Open Land (MOL).

Option 2 - Seek to regenerate Catford Town Centre without re-routing the South Circular, thereby maintaining the current extent of the designated MOL.

Topic	Option 1	Option 2	Commentary
Air quality and other pollution	★1	2	The re-routing of the A205 South Circular to the south of Laurence House has been discussed as an option for a number of years. Most recently, the Catford masterplan identifies it as the first of twelve place-making principles, with the subsequent eleven place-making principles essentially building upon it as a foundation.
Biodiversity and green infrastructure	★1	2	The effect of realigning the road to the south will be to free up space to the north of the road, which can then be used to deliver new high quality urban realm. This new urban realm will serve to effectively provide both north-south links (between the town centre and the current site of Lawrence House) and east-west links (between Lawrence House and the rail stations). This will address the current issue of very poor connectivity due to the busy road corridor.
Climate change adaptation	?	?	It is difficult to envisage how the objectives of the masterplan could be achieved without the realignment, and hence it is possible to highlight a wide range of benefits associated with Option 1 .
Climate change mitigation	★1	2	Focusing on matters directly, relating to the realignment, it is possible to highlight clear benefits in respect of air quality (the South Circular is forms the southern extent of the borough's AQMA); safety (the existing bridge over the railway line and Ravensbourne River is a pinch point for traffic where cars, lorries and buses take priority); and climate change mitigation (the Lewisham Energy Masterplan identifies a major opportunity to deliver a ground source heat pump array under the St. Dunstan's College Jubilee Grounds MOL at the same time as road realignment, with a view to minimising disruption).
Communities	Accessibility	★1	The Bakerloo Line Extension Economic Impact Assessment finds that Catford Bridge Station has a Health Streets score of 49, largely due to the problematic South Circular, but that an upgraded Catford Bridge station could assist with increasing the score to at least 65, with an improved interchange (Catford Station and busses), better use of the river and improved connection to the Broadway and town centre.
	Housing	★1	
	Other issues	★1	
Economy	★1	2	However, realignment will result in the loss of the northern-most part of the St. Dunstan's College Jubilee Grounds MOL , hence there are arguments for Option 2 . This MOL is used by the school and is not publicly accessible, but is widely valued as providing a green setting to Catford town centre. The MOL Review (2020) concludes a need to 'conserve and enhance' the MOL, finding that, whilst it performs quite poorly in terms of certain MOL criteria, it performs well in terms of 'contributing to the physical structure of London by being clearly distinguishable from the built-up area'. A mitigating factor is that a significant proportion of the MOL that would be lost is the current northeast corner that is already segregated from the main part of the MOL by a small access road (see image); however, there is no avoiding the conclusion that an area of MOL will be lost that is not insignificant.
Historic env, heritage, character and culture	★1	2	Another consideration is that this entire area falls within a fluvial flood risk zone , including areas of flood risk zone 3; however, it is difficult to conclude that realignment will necessarily support additional housing (or other sensitive uses) in a flood risk zone. To some extent, realignment may contribute to the strategic objective of 'unveiling' the currently hidden and culverted River Ravensbourne, which is adjacent to the west.
Land and natural resources	2	★1	
Transport	★1	2	



Conclusion

The table below presents a brief summary of the assessment findings set out across the appraisal matrices above, as well as the Council's response to the assessment / reasons for supporting the preferred option.

Assessment conclusions and Council responses

Policy issue	Assessment conclusion	Council response
Mixed use development of industrial sites	There are wide ranging arguments for supporting a planned approach to mixed use redevelopment of designated industrial sites; however, there are also certain risks to be aware of, including noting the tendency for existing industrial sites to be located in flood risk zones.	<p>The Council recognises that this is a challenging area of policy, that Lewisham is not alone in facing this challenge and that there is a need to consider this issue from a long term and 'larger-than-local' perspective.</p> <p>Light industrial and manufacturing jobs are a very important element of the employment mix locally, and it is also recognised that macro economic shifts, such as increased demand for warehousing and logistics, need to be taken into account. However, a key economic priority for this Local Plan is to greatly diversify the employment land offer, in particular by increasing the amount of low cost and affordable workspace for SMEs and micro business, including those in the creative, cultural and digital industries. There is a need for the Local Plan to strike a careful balance, and this matter will be kept under close review.</p> <p>The Council also considers that the preferred option is necessary to incentivise and enable the renewal/redevelopment of employment sites, on which new development might not otherwise come forward. It is considered this approach will provide for high quality and modern business space, new homes and community facilities to meet local needs, along with improving the contribution a site makes to its locality in terms of its place qualities.</p>
Zero carbon development	There is a need to maximise onsite emissions reductions and therefore minimise residual onsite emissions. However, there is invariably a need to allow flexibility for offsetting as part of any borough wide policy in support of zero carbon development. This is because it will often not be feasible or viable to reduce emissions to zero onsite. An effective way to minimise offsetting / maximise onsite reductions is through setting a high price per tonne of residual CO ₂ .	<p>The Council recognises that there is clear support for the emerging preferred option. Regardless, there will be a need to keep the policy under close review in light of latest understanding of best practice. This is a fast moving policy area nationally and within the London context. The Council agrees that there could be merit in exploring the price per tonne of residual carbon that developer are asked to pay as part of offsetting.</p>
Re-routing the South Circular at Catford	There is wide-ranging support for rerouting the South Circular at Catford, as it is difficult to envisage effective town centre regeneration without the realignment; also, there is an opportunity to deliver a ground source heat pump array at the same time as the realignment works. Whilst it is recognised that there will be loss of an area of MOL, the loss of MOL is of limited significance.	<p>The Council recognises that there is clear support for the emerging preferred option. Whilst acknowledging the important role that MOL plays in a highly urbanised setting, the re-routing of the South-Circular is critical to the comprehensive regeneration of Catford town centre, which will deliver wider public benefits through the delivery of new homes, including a high proportion of genuinely affordable housing; modern workspace and job opportunities; a revitalised civic and cultural hub with enhanced community facilities; and transformational public realm and environmental improvements.</p>